

Appendix C

California Coastal Act Consistency Analysis

TERMINAL ISLAND MARITIME SUPPORT FACILITY

California Coastal Act Consistency Analysis

Introduction

The California Coastal Act (CCA) established the California Coastal Commission (CCC) and created a State and local government partnership to ensure that public concerns regarding coastal development are addressed. The CCC has regulatory jurisdiction over the coastal zone, which extends seaward to the State's outer limit of jurisdiction (three nautical miles), including offshore islands, and inland generally 1,000 yards from the mean high tide line of the sea. Most of the Port of Los Angeles (POLA) is located within the coastal zone.

To enforce the CCA, local governments in coastal areas are required to develop Local Coastal Programs (LCPs) as part of their general plans. LCPs serve as local governments' land use plans, zoning ordinances, zoning district maps, and identify specific requirements for development within the coastal zone. The CCA provides rules for California ports outlined in Chapter 8 (Sections 30700-30721). A Port Master Plan (PMP) carries out the provisions of Chapter 8 of the CCA. The CCC originally certified the Port of Los Angeles Master Plan (POLA PMP) in 1980. The PMP establishes policies and guidelines to direct the future development of the POLA. The POLA PMP is designed to better promote and safely accommodate foreign and domestic waterborne commerce, navigation, and fisheries in the national, state, and local public interests. The POLA PMP also provides for public recreation facilities and visitor serving areas to facilitate public access to the waterfront and better integrate the Port with the surrounding community, consistent with the State Tidelands Trust.

CCA Consistency Analysis

Chapter 3 of the CCA identifies a number of planning and management policies for the preservation of coastal resources, with specific articles pertaining to general standards, public access, recreation, the marine environment, land resources, development and industry, and sea level rise. The relevant policies from Chapter 3 (Sections 30210-30270) and their relationship to the Proposed Project are discussed below.

Section 30211. Development not to interfere with access

Section 30211 of the CCA prevents development from interfering with public access to the sea where acquired through use or legislation; including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

The Proposed Project would not be sited on an existing beach, nor would it preclude public access to the sea. As such, the Proposed Project would be consistent with Section 30211 of the CCA.

Section 30231. Biological productivity; water quality

Section 30231 of the CCA stipulates that biological productivity and water quality should be maintained or restored, thereby:

...minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Ground-disturbing construction activities would not occur in close proximity to the water as the Project site is separated by the railroad tracks and Terminal Way (approximately 400 feet). Additionally, the Proposed Project would be subject to the requirements of the National Pollutant Discharge Elimination System (NPDES) Stormwater Program, which include obtaining coverage under the General Permit for Discharges of Stormwater

Associated with Construction Activity and the development and implementation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP). Construction and operations may involve a slight increase of runoff and/or interference with surface waterflow due to the addition of new impervious areas; however, the existing storm drain system would convey flows off site, and the Proposed Project may install a Low-Impact-Development-compliant drainage system or alternative artificial infiltration drainage system that would ensure additional flow capacity and proper conveyance of surface runoff. The Proposed Project would not deplete ground water supplies, discourage waste water reclamation, or infringe upon vegetation buffer areas or natural streams. Therefore, the Proposed Project is consistent with Section 30231 of the CCA.

Section 30232. Oil and hazardous substance spills

Section 30232 of the CCA mandates that protection against spills must be provided for any development involving the transport or use of oil or hazardous substances; and, if accidental spills do occur, that effective containment and cleanup procedures be provided.

The Proposed Project would involve limited transport, storage, use, and disposal of oil and hazardous substances during construction and operation. When not in use, these substances would be stored in an appropriate manner to prevent spills as required by State and local regulations. Additionally, standard best management practices and the Project-specific SWPPP would be implemented to minimize the risk of spills and contain and clean up any accidental spills that may occur. Mobile fuel service trucks would provide diesel and propane for on-site yard equipment during operations until 100 percent of yard equipment is transitioned to zero-emissions by January 1, 2030 per Project Feature (PF) AQ-1 (*Zero-Emission Operational Equipment*); all cargo-handling equipment would be zero-emission at the start of operations per mitigation measure (MM) AQ-1 (*Zero-Emission Cargo-Handling Equipment*). Mobile fuel service trucks would comply with all applicable regulations, including the US Environmental Protection Agency Spill Prevention, Control, and Countermeasure Regulation and the California Code of Regulations for hazardous materials management. The transport of diesel fuel to the Project site would comply with all applicable regulations regarding the shipment of hazardous materials on California highways and roads to ensure safe handling and minimize the likelihood of hazardous releases from transportation. As such, the Proposed Project is consistent with Section 30232 of the CCA.

Section 30240. Environmentally sensitive habitat areas; adjacent developments

Section 30240 of the CCA requires the protection of environmentally sensitive habitat areas (ESHAs), stipulating that development in areas adjacent to ESHAs must be sited and designed to avoid negative impacts. ESHAs are areas that contain plants, animals, or habitats that are either rare or especially valuable because of their special nature or role in an ecosystem, and which could be easily disturbed or degraded by human activities and developments.

While it is in the coastal zone, the Project site and adjacent areas are heavily disturbed, with container storage activities having occurred at the site as recently as 2023 and do not contain ESHAs. No sensitive wildlife or vegetation communities were identified on the Project site according to the Terrestrial Biological Characterization Survey completed for the Proposed Project (LAHD, 2023a). Therefore, the Proposed Project would be consistent with Section 30240 of the CCA. The nearest ESHA, eelgrass, is approximately 400 feet east of the Project site in Seaplane Lagoon, separated by the existing railroad tracks (LAHD, 2018a). There is no site drainage towards Seaplane Lagoon.

Section 30244. Archaeological or paleontological resources

Section 30244 of the CCA requires mitigation measures for development that would adversely impact archaeological or paleontological resources.

The Proposed Project is sited in the northern portion of Terminal Island, an artificial landform composed of harbor dredged material and industrial-grade fill. Background archival research did not identify the presence of any historically eligible, listed, or unique archaeological resources on or near the Project site (LAHD, 2023b). As such, the Proposed Project would not impact archaeological or paleontological resources and is thus consistent with Section 30244 of the CCA.

Section 30250. Location; existing developed area

Section 30250 of the CCA mandates that new residential, commercial, or industrial development be located within, contiguous with, or in close proximity to existing developed areas where it will not have significant adverse effects on coastal resources.

As mentioned above, the Proposed Project would be located on harbor dredged material and artificial fill at a site that has been used for container storage purposes as recently as 2023, would not prevent public access to the coast, and would implement a variety of measures to prevent runoff and spills of hazardous materials into harbor waters. Thus, the Proposed Project is consistent with Section 30250 of the CCA.

Section 30253. Minimization of adverse impacts

Section 30253 of the CCA establishes the following five requirements for new development:

- (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.
- (c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.
- (d) Minimize energy consumption and vehicle miles traveled.
- (e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

The Proposed Project is not sited in proximity to a known earthquake fault (closest is Palos Verdes Fault 0.5 mile away), is on flat ground that is not susceptible to landslides, and would incorporate modern engineering and safety standards in the Project design, thereby minimizing the risk of geologic hazard. The Project site is not located within a Federal Emergency Management Agency (FEMA) Flood Hazard Zone, and the Proposed Project would grade the site to generally match surrounding grades and install drainage systems, minimizing the risk of flood hazard. The Project site is not located in a CAL FIRE Fire Hazard Severity Zone (CAL FIRE, 2026). Prior to and during construction, coordination with the City of Los Angeles Fire Department (LAFD) would ensure that access for emergency service vehicles would be maintained, and that all relevant City of Los Angeles Municipal Code (LAMC) sections regarding fire safety would be followed, during construction activities. During operations, on-site fire hydrants would provide water for fire suppression and ongoing coordination would be maintained with the LAFD regarding testing and maintenance of fire prevention infrastructure as outlined in the LAMC, minimizing risk of fire hazard.

Project construction would comply with the NPDES Stormwater Program and a Project-specific SWPPP, minimizing the risk of erosion during construction. Additionally, incorporation of modern standard engineering and safety standards in Project design and compliance with Los Angeles Harbor Department (LAHD) engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse geological effects. The Project site is not on a bluff or cliff requiring protective devices.

Final Environmental Impact Report (EIR) Sections 3.1, *Air Quality*, and 3.3, *Greenhouse Gas Emissions* evaluated the Proposed Project's consistency with a variety of requirements imposed by the South Coast Air Quality Management District and California Air Resources Board. The Final EIR analysis found that the Proposed Project would not conflict with or obstruct implementation of an applicable air quality plan or plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Final EIR Section 3.2, *Energy* evaluated the Proposed Project's potential to result in significant environmental impacts due to wasteful, inefficient, or unnecessary energy consumption. The Final EIR analysis found that the Proposed Project would not result in wasteful or inefficient energy consumption, and included Project Feature (PF) AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) to reduce impacts related to air pollutant emissions by requiring zero-emission yard and cargo-handling equipment during operations. In addition, as discussed in the Notice of Preparation/Initial Study (Section 5.17, *Transportation*) the Proposed Project would generate 11.0 daily work VMT per employee, which is below the Los Angeles Department of Transportation's Transportation Assessment Guidelines threshold of 12.3 daily work VMT per employee for the Harbor Area Planning Commission area.

The Project site is within Planning Area 3 of the PMP, which primarily supports container operations and other industrial activities. No special communities or neighborhoods are present on Terminal Island. As such, the Proposed Project would be consistent with Section 30253 of the CCA.

Section 30255. Priority of coastal-dependent developments

Section 30255 of the CCA requires that coastal-dependent developments have priority over other developments near the shoreline and shall not be sited in a wetland. Coastal-related developments shall be located within reasonable proximity to the coastal-dependent uses they support.

The Proposed Project would provide an off-terminal chassis support facility that would increase the overall efficiency of goods movement within the Port. As such, the Proposed Project is a coastal-related development located within reasonable proximity to the coastal-dependent goods movement uses of the Port. The Proposed Project is not located in a wetland. Accordingly, the Proposed Project is consistent with Section 30255 of the CCA.

Section 30270. Sea level rise

Section 30270 of the CCA requires that sea level rise be taken into account in the planning and management of coastal resources.

The Proposed Project is sited adjacent to, but not directly bordering, the harbor waters at the POLA. Existing cargo rail tracks, as well as Terminal Way, an existing road, run along the southern and eastern borders of the Project site, separating it from the coastal edge of Terminal Island. The Sea Level Rise Adaptation Study prepared by LAHD evaluates the potential for adverse effects on coastal resources and surrounding communities stemming from sea level rise (SLR). The study found that SLR alone would not cause permanent inundation or shoreline overtopping at the Project site (LAHD, 2018b). However, the study found that SLR could, in combination with storm tide conditions, temporarily flood low lying areas within the Project site and access routes surrounding the site, inundating the Project site and temporarily interrupting Project operations. As such, the Project would operate under various contingency and emergency prevention and response plans that would mandate shutdown of infrastructure such as gas lines and electrical facilities in anticipation of flooding. These plans would minimize risk of gas line rupture and electrical hazard in an SLR flooding scenario. Although site access could be blocked by SLR flood conditions, vehicle movement would be able to resume within a matter of hours once flood waters have receded. Accordingly, SLR does not pose a substantial structural risk to the Proposed Project. Additionally, the Proposed Project would not include the storage or use of hazardous materials in quantities that would cause an adverse effect to nearby facilities or

communities if released during SLR flood conditions. Thus, the Proposed Project would be consistent with Section 30270 of the CCA.

Additionally, Chapter 8 of the CCA recognizes California ports, including POLA, as primary economic and coastal resources that are essential elements of the national maritime industry (Section 30701[a]). CCA Article 2 of Chapter 8 establishes policies governing port operations, including the protection of commercial fishing within port areas, diking, filling, and dredging, and tanker terminals (Sections 30702-30707). These policies are listed below, and their relationship to the Proposed Project are discussed.

Section 30702. Public Policy

~~The Proposed Project would develop a chassis support facility providing services such as chassis storage/ support and wheeled empty container storage for marine terminals across the POLA.~~ Section 30702 of the CCA states:

...the policies of the state with respect to providing for port-related developments consistent with coastal protection in the port areas to which this chapter applies, which require no commission permit after certification of a port master plan and which, except as provided in Section 30715, are not appealable to the commission after certification of a master plan, are set forth in this chapter.

The Proposed Project would develop a chassis support facility providing services such as chassis storage/ support and wheeled empty container storage for marine terminals across the POLA. The proposed improvements at the existing site are not among the appealable project categories in Section 30715 of Chapter 8 of the CCA (see discussion of Section 30715 that follows). As such, the Proposed Project would be consistent with Section 30702 of the CCA.

Section 30703. Protection of Commercial Fishing Harbor Space

Section 30703 of the CCA states that ports shall not eliminate or reduce existing commercial fishing harbor space, unless the demand for commercial fishing facilities no longer exists or adequate space has been provided. Proposed recreational boating facilities within port areas shall, to the extent feasible, be designed and located in such fashion as not to interfere with the needs of the commercial fishing industry.

The Proposed Project does not involve the elimination, reduction, or use of existing commercial fishing space or recreational boating facilities. Therefore, the Proposed Project is consistent with Section 30703 of the CCA.

Section 30705. Diking, Filling, or Dredging Water Areas

Section 30705 states that diking, filling, and dredging may occur when consistent with the certified PMP for a variety of purposes including the construction and modification of facilities required for the safety and accommodation of the vessels served by the port, the construction and modification of commercial fishing and recreational boating facilities, public service purposes involving utilities, mineral extraction, and nature study.

The Proposed Project does not involve the diking, filling, or dredging of water areas. As such, the Proposed Project would be consistent with Section 30705.

Section 30706. Fill

Section 30706 contains four conditions that govern fill:

- (a) The water area to be filled shall be the minimum necessary to achieve the purpose of the fill.*
- (b) The nature, location, and extent of any fill, including the disposal of dredge spoils within an area designated for fill, shall minimize harmful effects to coastal resources, such as water quality, fish or wildlife resources, recreational resources, or sand transport systems, and shall minimize reductions of the volume, surface area, or circulation of water.*
- (c) The fill is constructed in accordance with sound safety standards which will afford reasonable protection to persons and property against the hazards of unstable geologic or soil conditions or of flood or storm waters.*
- (d) The fill is consistent with navigational safety.*

The Proposed Project does not involve the fill of water areas and would thus be consistent with the conditions listed under Section 30706 of the CCA.

Section 30707. Tanker Terminals

Section 30707 contains four conditions that govern tanker terminals:

- (a) Minimize the total volume of oil spilled.*
- (b) Minimize the risk of collision from movement of other vessels.*
- (c) Have ready access to the most effective feasible oil spill containment and recovery equipment.*
- (d) Have onshore deballasting facilities to receive any fouled ballast water from tankers where operationally or legally required.*

The Proposed Project would not involve the development of a new or expansion of an existing tanker terminal and would not involve the use of vessels; therefore, the Proposed Project would not conflict with Section 30707 of the CCA.

Section 30708. Location, Design and Construction of Port-related Developments

All port-related developments shall be located, designed, and constructed so as to:

- a) Minimize substantial adverse environmental impacts.*

The California Environmental Quality Act (CEQA) requires LAHD, as the CEQA Lead Agency, to evaluate and disclose the potential environmental impacts of the Proposed Project and propose feasible alternatives or mitigation measures that avoid, eliminate, or reduce Project-related environmental impacts. Section 2, *Project Description*, describes in detail the history of the site and existing setting. A detailed discussion of the Project's characteristics is provided in Section 2.5, including a description of the Proposed Project's construction activities, equipment, schedule, and design.

Section 3, *Environmental Analysis*, provides detailed discussion of the environmental analyses and significance impacts for each environmental resource area evaluated for the Proposed Project. EIR Section 3.1, *Air Quality and Health Risk*, identifies a significant and unavoidable impact stemming from operational emissions of NOx exceeding South Coast Air Quality Management District (SCAQMD) peak day regional emissions

threshold for both the opening year (2029~~7~~) and buildout year (2049~~6~~) conditions. While it is possible that statutes such as the California Air Resources Board Advanced Clean Trucks and Advanced Clean Fleets regulations may result in accelerated conversion from traditional gas engine trucks to electric or other zero-emission models, it is currently unknown to what degree this conversion would affect the operations of the Proposed Project. To reduce operational NO_x emissions, ~~Project Feature (PF)~~ AQ-1 (*Zero-Emissions Operational Equipment*) would require a 100 percent transition to zero-emissions equipment by January 1, 2030, and any non-conforming equipment would be a breach of the Permit/Lease. Additionally, ~~mitigation measure (MM)~~ AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would require zero emission off-road cargo-handling equipment to be utilized at the start of Project operations. However, mitigation of operational NO_x emissions may have limited feasibility depending on Tenant capabilities, and NO_x emissions may still be significant until January 1, 2030. As such, NO_x impacts are determined to be significant and unavoidable even with implementation of all feasible mitigation.

EIR Section 3.3, *GHG Emissions*, discusses the Project's potentially significant impact from the generation of GHG emissions during construction and operations. MM GHG-1 (*GHG Reduction Offsets*) would require that future tenant(s) of the Maritime Support Facility and/or LAHD purchase and retire carbon offsets equivalent to Project GHG emissions that occur in excess of LAHD's annual threshold of 10,000 metric tons carbon dioxide equivalent (MTCO₂e). With mitigation, impacts from the generation of GHG emissions during construction and operations would be less than significant.

EIR Section 3.4, *Hazards and Hazardous Materials*, discusses the Project's potentially significant impacts from contaminated soil, groundwater, and soil vapor. MM HAZ-1 (*Characterize Soil, Soil Vapor, and Groundwater Contamination*) would have requirements for soil and groundwater testing, handling, storage, transport, and disposal, and outlines procedures for vapor sampling and determining the need for a vapor intrusion mitigation system. With mitigation, impacts from contaminated soil, groundwater, and soil vapor would be less than significant.

b) Minimize potential traffic conflicts between vessels

The Project site is located on Terminal Island. Vessel trips would not be generated during construction or operation of the Terminal Island Maritime Support Facility Project. Construction equipment and materials would be transported via regional and local roadways. During Project operations, the new grade separation (not part of the Proposed Project) on the western end of the site would serve as the access point for the chassis support facility. As such, construction and operational activities would not result in traffic conflicts between vessels. The Proposed Project would be consistent with CCA Section 30708(b).

c) Give highest priority to the use of existing land space within harbors for port purposes, including, but not limited to, navigational facilities, shipping industries, and necessary support and access facilities.

The proposed chassis support facility would fall under the category of support facilities, as it would provide a storage yard for chassis and wheeled empty containers that would increase the efficiency of overall Port operations. Moreover, while the Project site was formerly used as an empty container storage yard as recently as 2023, it is currently vacant. Because the Proposed Project would utilize existing land space within the harbor for port purposes, it would be consistent with CCA Section 30708(c).

d) Provide for other beneficial uses consistent with the public trust, including, but not limited to, recreation and wildlife habitat uses, to the extent feasible.

The Project site is located in Planning Area 3 – Terminal Island. This planning area is the largest in the Port, consisting of approximately 1,940 acres and more than 9.5 miles of usable waterfront, and is primarily

focused on container operations. The Project site has been unoccupied and vacated since mid-2023 and has not been operated by any entity. The Proposed Project would increase the efficiency of container operations by providing a chassis and wheeled empty container storage yard. As required under CCA Section 30708(c), the highest priority is given to the use of existing land space for port purposes such as the Proposed Project, which would use the land for the shipping industry and support facilities. The Proposed Project would be consistent with CCA Section 30708(d).

e) Encourage rail service to port areas and multi-company use of facilities.

Rail service is not needed for the Proposed Project; all construction materials and site access during operations would be autos (cars, trucks). However, Project operations would involve the storage of chassis and wheeled empty containers by one or multiple tenants, which would satisfy the goal of multi-company use of facilities. The Proposed Project operations would not impact the rail operations surrounding the site, keeping intact the rail service tracks that facilitate cargo movement port-wide. Therefore, the Proposed Project would be consistent with CCA Section 30708(e).

Appealable Approvals

A Coastal Development Permit (CDP) is required for development within the coastal zone and would be subject to review and approval by the Board of Harbor Commissioners. Once a PMP has been certified, the port governing body has the authority to issue a CDP for any development found consistent with the certified PMP. The Board of Harbor Commissioners has the ability and the responsibility to amend the PMP as needed; however, any PMP amendment must be certified by the CCC (CCA Section 30716(a)).

Approval of any of the following categories of development may be appealed to the CCC.

Section 30715. Permit Authority; Appealable Approvals

Chapter 8, Section 30715(a) of the CCA states that the following categories of development may be appealable to the CCC:

- (1) *Developments for the storage, transmission, and processing of liquefied natural gas and crude oil in such quantities as would have a significant impact upon the oil and gas supply of the state or nation or both the state and nation.*

The Proposed Project does not involve development for the storage, transmission, or processing of liquefied natural gas in any quantity. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(1).

- (2) *Waste water treatment facilities, except for those facilities which process waste water discharged incidental to normal port activities or by vessels.*

The Proposed Project is not a waste water treatment facility. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(2).

- (3) *Roads or highways which are not principally for internal circulation within the port boundaries.*

The Proposed Project does not involve the construction or modification of roads or highways which are not principally for internal circulation within port boundaries. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(3).

- (4) *Office and residential buildings not principally devoted to the administration of activities within the port; hotels, motels, and shopping facilities not principally devoted to the sale of commercial goods utilized for water-oriented purposes; commercial fishing facilities; and recreational small craft marina related facilities.*

The Proposed Project does not involve the construction of office and residential buildings not principally devoted to the administration of activities within the Port; hotels, motels, and shopping facilities not principally devoted to the sale of commercial goods utilized for water-oriented purposes; commercial fishing facilities; or recreational small craft marina related facilities. The Proposed Project would modify the interior of approximately 2,900 square feet of office space that would be principally devoted to the administration of the chassis support facility. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(4).

- (5) *Oil refineries.*

The Proposed Project would involve the construction and operation of a chassis support facility. The Proposed Project does not include the construction and operation of a new oil refinery. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(5).

- (6) *Petrochemical production plants.*

The Proposed Project would involve the construction and operation of a chassis support facility. The Proposed Project does not include the construction and operation of a new petrochemical production plant. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(6).

Section 30715.5. Finding of Conformity

Section 30715.5 states that:

No developments within the area covered by the certified port master plan shall be approved by the port governing body unless it finds that the proposed development conforms with such certified plan.

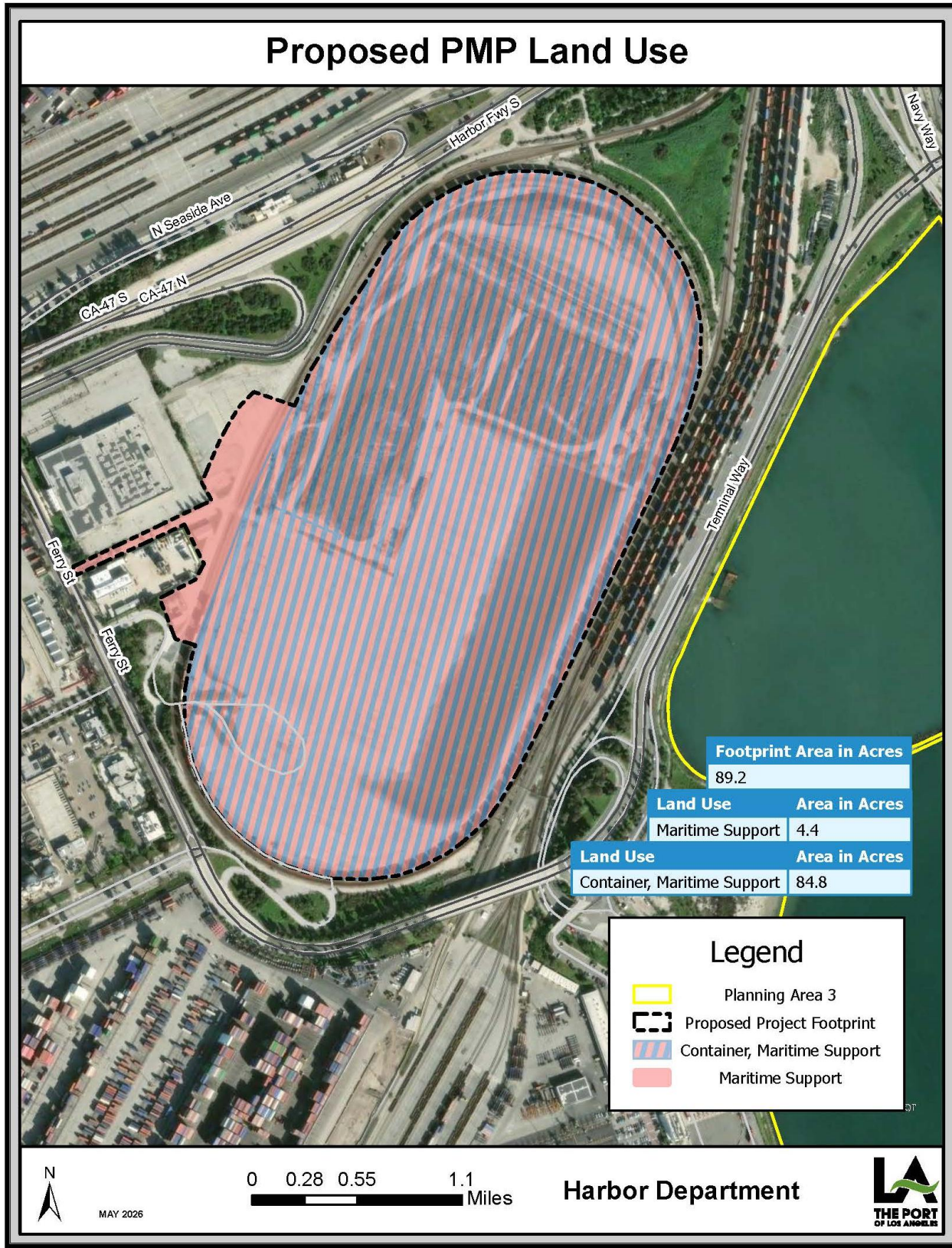
Section 2.4.2, *Project Site and Surrounding Uses*, discusses the Proposed Project's conformity with the PMP, noting that the Proposed Project would require a PMP amendment to update the land use designation of Maritime Support (23.6 acres), Liquid Bulk (53.3 acres), and Container (12.3 acres) to a dual designation of Container and Maritime Support for the area within "the loop" (full 89.2 acres). The Board of Harbor Commissioners must determine that the Proposed Project aligns with the PMP prior to Project approval. Current Land uses of the Project site and surrounding parcels are shown in Figure 1. The revised PMP designations are shown in Figure 2.

Figure 1. Zoning_PMP Land Use Designations Near at the Project Site



Note: Boundaries and associated acreages presented are approximate and based on a conceptual design only.

Figure 2. Proposed PMP Land Use Designations at the Project Site – NEW



Note: Boundaries and associated acreages presented are approximate and based on a conceptual design only.

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