

Notice of Preparation/Initial Study

Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility

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Contents

	<u>Page</u>
1.0 PROJECT OVERVIEW AND BACKGROUND.....	1-1
1.1 California Environmental Quality Act Process	1-2
1.2 Document Format.....	1-3
2.0 PROJECT DESCRIPTION.....	2-1
2.1 Project Overview	2-1
2.1.1 Project Location	2-1
2.1.2 Proposed Site Plan	2-4
2.1.3 Existing Site Conditions	2-6
2.1.4 Project Background and Objectives.....	2-7
2.2 CEQA Baseline	2-9
2.3 Project Description	2-9
2.3.1 Construction.....	2-9
2.3.2 Operation.....	2-13
3.0 PROJECT PERMITS AND APPROVALS	3-1
4.0 INITIAL STUDY CHECKLIST	4-1
4.1 Environmental Factors Potentially Affected.....	4-3
4.2 Determination	4-4
4.3 Environmental Checklist.....	4-5
5.0 ENVIRONMENTAL ANALYSIS.....	5-1
5.1 Aesthetics.....	5-1
5.2 Agriculture and Forestry Resources	5-3
5.3 Air Quality.....	5-4
5.4 Biological Resources	5-6
5.5 Cultural Resources	5-9
5.6 Energy	5-10
5.7 Geology and Soils	5-12
5.8 Greenhouse Gas Emissions.....	5-16
5.9 Hazards and Hazardous Materials	5-16
5.10 Hydrology and Water Quality.....	5-20
5.11 Land Use Planning	5-24
5.12 Mineral Resources	5-25
5.13 Noise	5-26
5.14 Population and Housing	5-28
5.15 Public Services.....	5-29
5.16 Recreation	5-32
5.17 Transportation	5-32
5.18 Tribal Cultural Resources.....	5-35

5.19 Utilities and Service Systems5-36

5.20 Wildfire5-39

5.21 Mandatory Findings of Significance5-40

6.0 PREPARERS AND CONTRIBUTORS6-1

6.1 Los Angeles Harbor Department.....6-1

6.2 Aspen Environmental Group Team6-1

7.0 REFERENCES.....7-1

Figures

Figure 2-1. Project Location.....2-2

Figure 2-2. Proposed Site Plan.....2-5

Figure 2-3. CalGEM Well Finder Results.....2-7

Tables

Table 2-1. Anticipated Training Equipment.....2-14

Appendix

Appendix A: 2022 LADOT TAG Plan Consistency Worksheet

Acronyms and Abbreviations

AB	Assembly Bill
APN	Assessor's Parcel Number
BMP	best management practice
Caltrans	California Department of Transportation
CCC	California Coastal Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CII	Commercial, Industrial, and Institutional
CNEL	Community Noise Equivalent Level
CY	cubic yards
DOC	California Department of Conservation
DRO	diesel range organics
DTSC	California Department of Toxic Substances Control
ECOS	Environmental Conservation Online System
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FY	Fiscal Year
GHG	greenhouse gas
HCP	Habitat Conservation Plan
HP	horsepower
H RTP	High Road Training Partnership
IGP	Industrial General Permit
ILWU	International Longshore & Warehouse Union
IS	Initial Study
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
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 and Environment
LEED	Leadership in Energy and Environmental Design
MRO	Motor oil range organics
NCCP	Natural Community Conservation Plan
No.	Number
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
PMA	Pacific Maritime Association
PMP	Port Master Plan
RWQCB	Regional Water Quality Control Board
SR	State Route
SWIRP	Solid Waste Integrated Resources Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TIWRP	Terminal Island Water Reclamation Plant
TPH	Total petroleum hydrocarbons
U.S.	United States
USACE	US Army Corps of Engineers
USEPA	US Environmental Protection Agency
USGS	US Geological Survey
VMT	vehicle miles traveled

NOTICE OF PREPARATION/INITIAL STUDY

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

1.0 PROJECT OVERVIEW AND BACKGROUND

This Notice of Preparation (NOP)/Initial Study (IS) is to inform responsible and trustee agencies, public agencies, and the public that the Los Angeles Harbor Department (LAHD), as the Lead Agency under the California Environmental Quality Act (CEQA), has independently determined that potential significant environmental impacts may be associated with the proposed Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility (Workforce Training Facility or Proposed Project), and an Environmental Impact Report (EIR) is required. The Proposed Project would include the construction and operation of a training facility for current and future workers in the maritime and goods movement industries at the Ports of Los Angeles and Long Beach. The Proposed Project site is comprised of approximately 30 acres and is located in the northern portion of the Port of Los Angeles (Port or POLA), adjacent to and north of Anchorage Road, west of State Route (SR)-47 and North Henry Ford Avenue, and east of Shore Road, in the community of Wilmington within the City of Los Angeles, California. LAHD has prepared, as part of this NOP, an Initial Study Checklist for the EIR determination in accordance with current City of Los Angeles Guidelines for the Implementation of the California Environmental Quality Act of 1970 (Article I); the State CEQA Guidelines (Title 14, California Code of Regulations); and the California Public Resources Code (Section 21000, et seq.). The Initial Study Checklist is attached to this NOP for public review and comment.

LAHD administers the Port under the California Tidelands Trust Act of 1911 and the Los Angeles City Charter. LAHD develops and leases Port property to tenants who operate the facilities. The Port provides a major gateway for international goods and services. The Port includes 23 major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger facilities. In addition to cargo business operations, the Port is home to commercial fishing vessels, shipyards, boat repair facilities, and recreational, community, and educational facilities.

The Proposed Project's construction would include the following activities: site preparation such as grading, compacting, and paving as well as construction of buildings, utilities, a substation, and accessory structures to support workforce training activities.

The Proposed Project's operations at the training facility would include providing skilled training programs that would replicate goods movement environments such as the use and operation of ship-to-shore (STS) cranes, transtainers, top handlers, side picks, forklifts, and heavy lifts, while providing a safe training environment for workers. A facility operator would likely operate the Proposed Project as a workforce training facility to educate the current and future workforce on maritime and goods movement industries that serve the San Pedro Bay Port Complex (Port of Los Angeles and Port of Long Beach, collectively). This would be the first training facility in the United States dedicated specifically to the goods movement sector as a whole, including training

for longshore, trucking, and warehouse occupations. LAHD would enter into a long-term entitlement at the Proposed Project site with a training facility operator to be identified in the future. For the analysis in this Initial Study Checklist, the Proposed Project is assumed to be in operation for 30 years.

1.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT PROCESS

This document was prepared in accordance with CEQA (California Public Resources Code, Section 21000 et seq.), the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.), and the City of Los Angeles CEQA Guidelines (City of Los Angeles, 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 implementation. 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. As the lead agency, LAHD must complete an environmental review to determine if implementation of the Proposed Project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, this NOP/IS has been prepared to assist in making that determination in accordance with California Public Resources Code Section 21153, State CEQA Guidelines Section 15063, and the City of Los Angeles CEQA Guidelines.

This NOP/IS, along with public comments received during the scoping period, will determine what environmental issue areas may be adversely affected by the Proposed Project. These issue areas will be assessed in the Environmental Impact Report (EIR) prepared for the Proposed Project. The EIR will determine the nature and extent of any potential environmental impacts and establish any necessary and appropriate mitigation measures. The EIR will also include an evaluation of alternatives to the Proposed Project that would reduce or avoid significant impacts, including a No Project Alternative. A preliminary evaluation of the potentially affected environmental issues is included in Section 5.0, Environmental Analysis.

Consistent with State CEQA Guidelines Section 15082(a)(1), LAHD has identified the following potentially significant environmental effects of the Proposed Project, which will be addressed in the EIR: Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use Planning, Noise, and Transportation.

In accordance with CEQA and the State CEQA Guidelines, this NOP/IS will be circulated for a period of 45 days for public comment and scoping. The public comment period for this NOP/IS scheduled to begin on February 8, 2024, and will conclude on March 26, 2024. Responsible and trustee public agencies and other interested or involved agencies, organizations, and private individuals will be notified of the availability of the NOP/IS. The document is also available for review online at <https://www.portoflosangeles.org/ceqa>. A copy of the document is available for public review at the Los Angeles Harbor Department, Environmental Management Division, located at 425 South Palos Verdes Street, San Pedro, CA 90731. Please send your request to ceqacomment@portla.org or call (310) 732-3615 to schedule an appointment to pick up a copy.

During the 45-day public scoping period, the public has an opportunity to provide written comments on the information contained within this NOP/IS. Comments on the NOP/IS should be submitted in writing prior to the end of the 45-day public review period and must be postmarked by March 26th, 2024.

Please submit written comments to:

Director of Environmental Management
City of Los Angeles Harbor Department
425 S. Palos Verdes Street
San Pedro, California 90731

Written comments may also be sent via email to ceqacomment@portla.org. Comments sent via email should include the project title, "Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility," in the subject line. For additional information, please contact Nicole Enciso at (310) 732-3615 or ceqacomment@portla.org.

A public scoping meeting for the Proposed Project will be held on February 22nd, 2024 via Zoom. Information can be found at <https://www.portoflosangeles.org/ceqa>.

1.2 DOCUMENT FORMAT

This NOP/IS contains the following five sections:

- **Section 1.0. Project Overview and Background.** This section provides an overview of the Proposed Project and the CEQA environmental documentation process.
- **Section 2.0. Project Description.** This section provides a detailed description of the Proposed Project's objectives and components.
- **Section 3.0. Project Permits and Approvals.** This section lists approvals and permits that could be required for the Proposed Project.
- **Section 4.0. Initial Study Checklist.** This section presents the CEQA checklist for all issue areas and mandatory findings of significance.
- **Section 5.0. Environmental Analysis.** 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 affect a given issue area, the relevant section provides a brief discussion of the reasons why no or less-than-significant impacts are expected. If the Proposed Project could have a potentially significant impact on a resource, the issue area discussion provides a description of potential impacts, and the issue area will be evaluated further in the EIR.
- **Section 6.0. Preparers and Contributors.** This section lists professional staff involved in the preparation of the NOP/IS.
- **Section 7.0. References.** This section provides a list of reference materials used during preparation of the NOP/IS.

The environmental analysis included in Section 5.0, Environmental Analysis, is consistent with the CEQA IS format presented in Section 4.0, Initial Study Checklist. Impacts are separated into the following categories:

- **Potentially Significant Impact.** This category is only applicable if substantial evidence indicates that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less-than-significant level. Issues considered potentially significant will be further analyzed in the EIR.
- **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). Given that this is an IS, potentially significant impacts that require mitigation will be carried forward to the EIR for further analysis.
- **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. Issues considered less than significant are discussed in this IS and will not be carried forward to the EIR.
- **No Impact.** This category applies when the 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 that the impact does not apply to the specific project (e.g., the project falls outside of a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors and general standards (e.g., the Proposed Project would not expose sensitive receptors to pollutants based on a project-specific screening analysis). Issues considered to have no impact are discussed in this IS and will not be carried forward to the EIR.

2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

This Initial Study (IS) Checklist has been prepared to evaluate the reasonably foreseeable and potential impacts associated with the construction and operation of a facility to train the workforce at the Ports of Los Angeles and Long Beach. The Proposed Project site is comprised of approximately 30 acres and is located at 1400 East Anchorage Road in the northern portion of the Port of Los Angeles (POLA) west of State Route (SR)-47 and North Henry Ford Avenue, and east of Shore Road, in the community of Wilmington within the City of Los Angeles, California.

The Proposed Project's construction would include the following activities: site preparation such as grading, compacting, and paving as well as construction of buildings, utilities, a substation, and accessory structures to support workforce training activities.

The Proposed Project's operations at the training facility would include providing skilled training programs that would replicate goods movement environments such as the use and operation of ship-to-shore (STS) cranes, transtainers, top handlers, side picks, forklifts and heavy lifts, while providing a safe training environment for workers. While the details are still forthcoming, a facility operator would operate the Proposed Project as a workforce training facility to educate the current and future workforce on maritime and goods movement industries that serve the San Pedro Bay Port Complex (Port of Los Angeles and Port of Long Beach, collectively). This would be the first training facility in the United States dedicated to the goods movement sector, including training for longshore, trucking, and warehouse occupations. The Los Angeles Harbor Department (LAHD) would enter into a long-term entitlement at the Proposed Project site with a training facility operator to be identified in the future. For the analysis in the Initial Study Checklist, the Proposed Project is assumed to be in operation for 30 years.

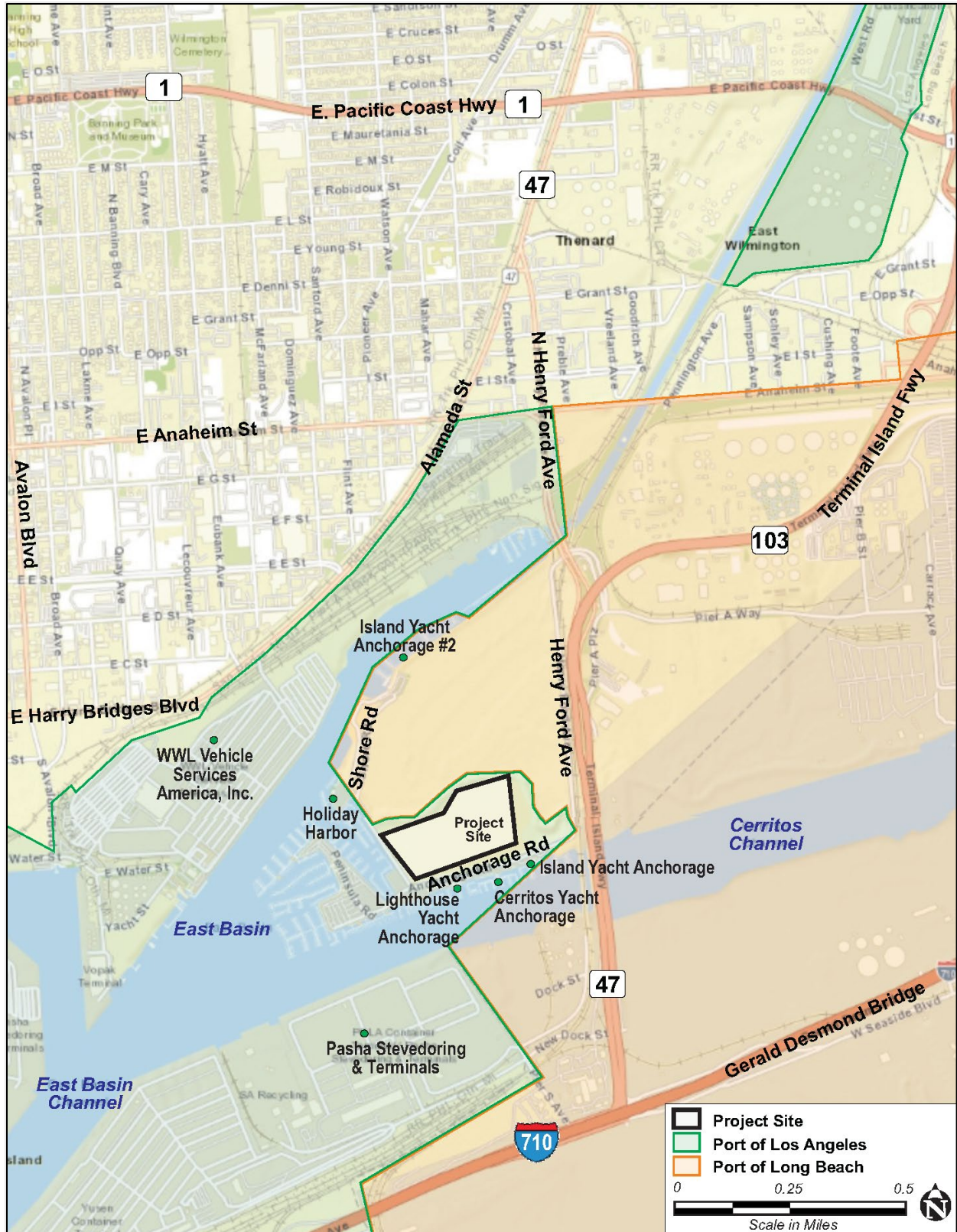
This section discusses the location, background, objectives, and description of the Proposed Project.

2.1.1 Project Location

Regional Setting

The Proposed Project site is located in the northern portion of the Port, approximately 20 miles south of downtown Los Angeles (Figure 2-1). The Port encompasses approximately 7,500 acres, including 3,300 acres of water and 43 miles of waterfront. The Port has approximately 270 commercial berths and 27 terminals, including leased facilities to handle containers, automobiles, dry bulk, breakbulk and liquid bulk products, and cruise ships, as well as extensive transportation infrastructure for intermodal cargo movement by truck and rail.

Figure 2-1. Project Location



The Port accommodates passenger cruise and ferry terminals, includes boat repair yards, and provides slips for 3,800 recreational vessels, 78 commercial fishing boats, 35 miscellaneous types of small-service craft, and 15 charter vessels for sport fishing and harbor cruises. The Port also accommodates water-dependent recreational, visitor-serving, community, and educational facilities, such as a public beach, the Cabrillo Beach Youth Waterfront Sports Center, Cabrillo Marine Aquarium, Los Angeles Maritime Museum, 22nd Street Park, and the Wilmington Waterfront Park.

LAHD, a proprietary department of the City of Los Angeles (City), is charged with the operation, maintenance, and management of the Port in accordance with the City Charter. As landlord, LAHD leases properties to more than 300 tenants, including private terminal, tug, marine cargo, and cruise industry operators. LAHD administers the Port under the California Tidelands Trust Act of 1911, as amended, California Public Resources Code Section 6306 – Granted Public Trust Lands. The City Charter requires LAHD to manage and operate the Port to promote and accommodate maritime commerce, navigation and fishery.

The Proposed Project site is within Planning Area 2 of the Port, which consists of a variety of uses ranging from Containers, breakbulk, liquid and dry bulk and maritime support to recreational boating and open space, as designated by the Port Master Plan (LAHD, 2018). Recreational uses such as marinas are located nearby to the north, south, and west of the Proposed Project site (Figure 2-1). Nearby marinas include Island Yacht Anchorage (1500 Anchorage Road, #205d), Cerritos Yacht Anchorage (1400 Anchorage Road), Lighthouse Yacht Marina (Berth 205-B, 1300 Anchorage Road), Holiday Harbor (701 Shore Road), and Island Yacht Anchorage #2 (700 Shore Road). WWL Vehicle Services, Americas, Inc. is located at Berths 195-200A, approximately 0.26 mile northwest of the Proposed Project site across East Basin. Pasha Stevedoring & Terminals, LP (breakbulk) is located at Berths 206-209, approximately 0.16 mile southwest of the Proposed Project site across the Cerritos Channel (LAHD, 2023d). Property owned by the Port of Long Beach is located adjacent to the north and east.

Project Setting

The Proposed Project site is located at 1400 East Anchorage Road, Wilmington, CA 90744, northeast of the intersection of Shore Road and Anchorage Road within the City of Los Angeles, California. The site is bounded by Shore Road to the west, Anchorage Road to the south, a wetland to the northwest, and asphalt roads adjacent to partially undeveloped land to the north and east owned by the Port of Long Beach. The partially undeveloped land to the north and east appears to be in oil production as was apparent from several oil derricks, above-ground pipelines, and other infrastructure that were observed during a site visit in July 2022. Recreational uses such as boat marinas are located to the north, south, and west of the Proposed Project site, and automobile shipping and breakbulk cargo uses are located across the East Basin and Cerritos Channel (Figure 2-1).

Shore Road would provide the primary point of ingress and egress during construction and operations; a secondary egress on Anchorage Road would provide emergency access to comply with the City of Los Angeles Fire Department requirements. Regional access to the Proposed Project site is provided by SR-47 to the east, with local access provided by North Henry Ford Avenue to the east, Anchorage Road to the south, and Shore Road to the west (Figure 2-1).

Land Use and Zoning

The Proposed Project site is within an area covered by the Port Master Plan (PMP) (LAHD, 2018). The PMP establishes policies and guidelines to direct future development of the Port. The original plan became effective in April 1980, after it was approved by the Board of Harbor Commissioners and certified by the California Coastal Commission (CCC). The PMP was comprehensively updated in 2014 and certified by the CCC. The PMP was amended once more in 2018 and certified by the CCC.

The PMP includes five planning areas. The Proposed Project site falls into Planning Area 2, West Basin/Wilmington (LAHD, 2018). The Proposed Project would replace a potential redevelopment project for passive open space mentioned for the site in the PMP. PMP Section 5.4.4 states that the Proposed Project site was planned for development as passive open space with native habitats, wetlands, turf, hardscapes, and numerous trails. Planning Area 2 encompasses the West Basin and Wilmington areas and includes Berths 96-204. The West Basin consists of container terminals, while the remaining Wilmington areas consist of a variety of uses ranging from breakbulk at Berths 176-181, liquid bulk at Berths 148-150, and liquid and dry bulk uses on Mormon Island, to recreational boating and open space along Anchorage Road. The Wilmington Waterfront land uses provide public access to the waterfront at Berths 183-186.

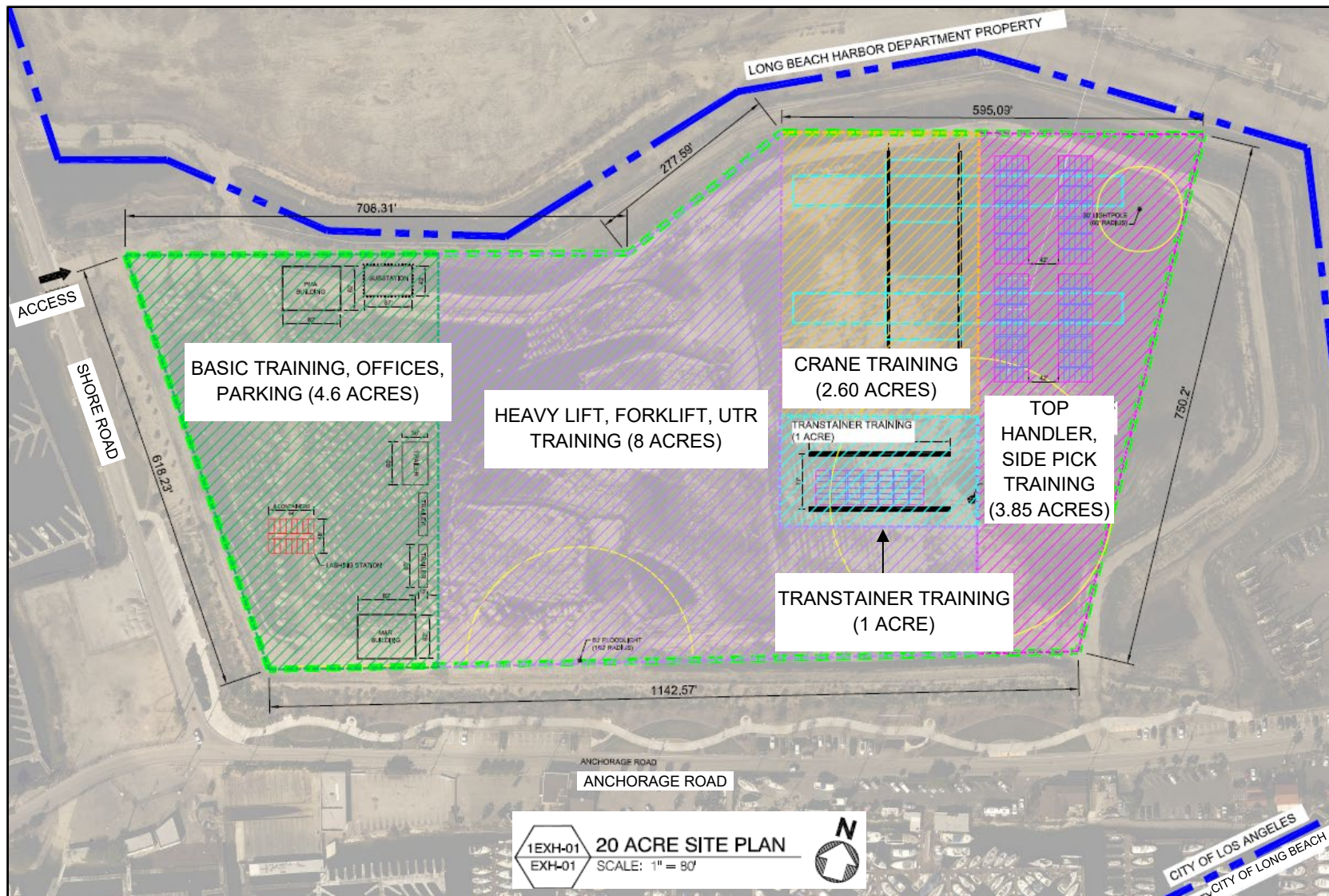
The Proposed Project site is on Assessor's Parcel Number (APN) 7440011908, which is designated as Open Space in the PMP (LAHD, 2018). The Proposed Project would require a PMP Amendment to update the designated land use for the site.

The Proposed Project site is zoned as qualified-light industrial ([Q]M2-1) and Heavy Industrial (M3) under the City of Los Angeles Zoning Ordinance (City of Los Angeles, 2023).

2.1.2 Proposed Site Plan

As discussed further in Section 2.1.3, Existing Site Conditions, the Proposed Project site is currently undeveloped and unoccupied, and contains dredged material consisting of soils of unknown origin that have been stored by the Port (Ninyo & Moore, 2022). The Proposed Project site is comprised of approximately 30 acres of land, of which 20 acres would be paved and developed under the Proposed Project. See Figure 2-2 for the proposed site plan. The final geometry of the site would be dependent on refinement of the final Project design.

Figure 2-2. Proposed Site Plan



Source: LAHD, 2023d

Note: This proposed site plan is subject to refinement as the Proposed Project design is further developed.

2.1.3 Existing Site Conditions

The Proposed Project site varies in elevation but is relatively flat with inclines in the southeast, eastern, and northeastern corners and central-western portion. Earthen berms are located to the south and west generally along the boundaries of the Proposed Project site. An alkali pond and several seasonal freshwater pools are present on the Proposed Project site. The Proposed Project site also contains soil stockpiles, debris, and dredge and fill material deposited at the site from past Port projects (Ninyo & Moore, 2022).

The Proposed Project site is currently unoccupied and was used as a dump site for excess soil for the past decade (Earth Mechanics, Inc., 2022). A site walk conducted by Ninyo & Moore on July 6, 2022 noted numerous stockpiles of various materials (various soil types, dredged materials, concrete slabs, asphalt, gravel, cobbles, boulders, etc.) at the north-central, northwest, and southwest portions of the site. Remnant debris such as piping, used tires, ceramic tiles, and a large roll-off waste bin were observed on the western half of the property, and a 55-gallon steel drum with unknown contents was also observed in the eastern portion of the property (Ninyo & Moore, 2022). Based on the soil stockpile characterization sampling conducted by Ninyo & Moore in May 2023, stockpiled soil contains concentrations of contaminants exceeding regulatory screening levels. Stockpiled soils would be characterized as both non-hazardous and non-Resource Conservation and Recovery Act (RCRA) hazardous waste (Ninyo & Moore, 2023a).

Ninyo & Moore also prepared the Baseline Soil, Soil Vapor, and Groundwater Investigation Report for the Proposed Project. The investigation determined that total petroleum hydrocarbons (TPH) and Title 22 metals in groundwater should not pose a substantial human health risk for site occupants. The investigation also found volatile organic compound (VOC) concentrations in soil vapor samples and identified the Project site being located within a methane zone (Ninyo & Moore, 2023b).

According to the California Geologic Energy Management Division (CalGEM) Well Finder tool, no active wells are within the Proposed Project site boundary, but the site includes several inactive wells as noted by the gray circle icons in Figure 2-3 (CalGEM, 2023).

Figure 2-3. CalGEM Well Finder Results

Source: CalGEM, 2023.

2.1.4 Project Background and Objectives

Project Background

In 2017, the California Workforce Development Board awarded the Port a High Road Training Partnership (H RTP) grant. The Port was one of the State's first recipients and was awarded the grant to promote a partnership between the Port, the Pacific Maritime Association (PMA) and the International Longshore & Warehouse Union (ILWU) (POLA, 2023a). The partnership's focus was to examine how to bring high road principles, such as equity, job quality, and sustainability into longshore work. The grant award and the high road partnership resulted in a mutual understanding for the need of a workforce training facility at the Port that could provide all goods movement workers with state-of-the-art training in a safe environment. In 2019, Port staff began to discuss a possible workforce training facility.

In June 2022, the California State Legislature adopted the State of California's Fiscal Year (FY) 2022-2023 budget, which was signed into law by Governor Newsom. The adopted budget includes \$110 million for construction of the Proposed Project facility provided in the following three annual installments: \$30 million in FY 2022-2023; \$40 million in FY 2023-2024; and \$40 million in FY 2024-2025. The adopted budget allows the State of California, through the California Workforce Development Board, to provide the funding to the Port in the above schedule, with the FY 2023-2024 and FY 2024-2025 allocation subject to approval of fund amounts in the budget for those fiscal years. In January 2024, the Governor addressed a State budget shortfall by adjusting the \$40 million previously scheduled for FY 2024-2025 to \$20 million in FY 2025/2026 and \$20 million in FY 2026-2027.

Over time, staff continued to refine the site locations and possible designs of the Workforce Training Facility, and the Port of Long Beach joined in efforts to move this project forward. As the goods movement sector is closely linked across the different nodes of the supply chain, staff began to develop the Workforce Training Facility design to benefit the entire goods movement sector and therefore focus on training in occupations related to longshore work, trucking, and warehousing.

The Proposed Project would be the first workforce training facility in the United States dedicated to the goods movement sector. The goal of the Workforce Training Facility is to provide a facility for the existing and future training needs in these occupations and provide a state-of-the-art facility to train workers in this industry on zero-emission cargo handling equipment as the San Pedro Bay Port Complex seek to transition to zero-emission cargo handling equipment by 2030 and drayage trucks by 2035. The Workforce Training Facility would replicate goods movement environments by providing skilled training programs such as the use and operation of STS cranes, transtainers, top handlers, side picks, forklifts and heavy lifts, while providing a safe training environment for workers. The Proposed Project is described in detail in Section 2.3.

Project Objectives

The primary objectives of the Proposed Project are to:

1. Prepare the existing site to support the construction and operation of a training facility devoted to educating current and future workforce on the maritime and goods movement industries serving the San Pedro Bay Port Complex.
2. Address the existing labor shortage by attracting new workers and providing opportunities for up-skilling or re-skilling to meet the needs of the cargo industry.
3. Increase cargo terminal efficiency by providing a modern workforce training facility implementing new technologies and in cooperation with local stakeholders.
4. Meet local environmental goals, including the transition to zero-emissions cargo handling equipment by 2030 and trucks by 2035, by incorporating zero- and near-zero emissions technologies and implementing new sustainability standards.
5. Develop previously vacant land on Port property in a manner that is consistent with underlying industrial zoning and adjacent industries operating within the Port of Los Angeles.

2.2 CEQA BASELINE

CEQA requires an EIR to include an assessment of the significance of a project's impacts in comparison to a baseline that consists of the existing physical environmental conditions at and near a project site. Baseline conditions are normally measured at the time of commencement of environmental review of a proposed project. CEQA Guidelines, Section 15125, subdivision (a), provides:

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

The CEQA baseline for the Proposed Project is the existing conditions of the unoccupied site. Currently, no operations are taking place at the Proposed Project site, and therefore, no employee trips are being generated at the site. The Proposed Project would result in a new use at the site and could cause new potential impacts such as emissions, noise, and passenger vehicle trips associated with construction (site preparation and buildout) of the facility and proposed operations at the training facility.

2.3 PROJECT DESCRIPTION

2.3.1 Construction

The construction of the Proposed Project, including best management practices, schedule, phases, workforce, and equipment, are discussed in the following sections.

Construction Schedule

Proposed Project construction would be completed in two phases. Phase 1 would include earthwork improvements, and Phase 2 would include construction of the training facility. Construction of the Proposed Project is anticipated to take approximately 36 months in total for both phases.

Phase 1 (Earthwork Improvements). Earthwork improvements would involve the following sub-phases: (1) site preparation (including removal of abandoned piping and utility work for plugged oil wells), (2) vertical wick drain construction and surcharge, and (3) grading. Construction would typically be completed on Monday through Friday during daylight hours between approximately 8:00 a.m. and 4:00 p.m. Schedule adjustments may be required depending on various factors. Work would be sequential, is expected to begin in January 2026, and would take approximately 12 months to complete Phase 1.

Phase 2 (Construction of the Workforce Training Facility). Construction of the training facility is anticipated to be completed over approximately 24 months. Construction would include the following phases: (1) building construction, (2) pavement construction, (3) utility improvements (including installation of a substation), (4) crane rail construction, (5) pile driving, (6) fencing, and (7) striping. The estimated timeline of construction is as follows:

- Paving: 18 days
- Utility Work: 24 months
- Building and infrastructure development: 4 months

Construction sequencing would include overlap between the subphases such that construction would take up to 24 months to complete. Construction activities during Phase 2 would be completed on Monday through Friday during daylight hours between 8:00 a.m. and 4:00 p.m.

More details on the construction activities during each phase are provided in the following sections.

Phase 1: Earthwork Improvements

During this phase, LAHD would prepare the site prior to construction and operation of the proposed Workforce Training Facility. The site would be backfilled, compacted, and graded to provide a level site in preparation of Phase 2 (construction of the Workforce Training Facility). The Proposed Project site would be graded to direct surface runoff towards the proposed storm drain system. LAHD would first remove existing debris from the site, which would include concrete slabs, asphalt, gravel, cobbles, boulders, piping, used tires, and ceramic tiles. LAHD would remove all debris and backfill deficient areas with approximately 32,000 cubic yards (CY) of imported fill. Existing soil that is able to be retained on site would be strengthened by using a combination of surcharge and vertical wick drains to accommodate the proposed facility. Any excess soil material left over after grading would be used to construct a berm wall along the perimeter of the Proposed Project site. Existing plugged oil wells on site (Figure 2-3) would be assessed for abandonment if no responsible operator is present, in accordance with CALGEM Statutes and Regulations under California Public Resources Code (PRC) Sections 3208 and 3208.1. Dewatering of surface water and groundwater may be required to remove an existing alkali pond and several seasonal freshwater pools on the Proposed Project site. Following dewatering, wastewater would be temporarily stored on site in tanks for off-site disposal, and the areas would be backfilled.

Site infrastructure improvements would include installation of utility systems including electrical, sewer, water, storm drain, and telecommunication systems. During on-site earthwork improvement activities, the construction contractor would use a meter to obtain water from the municipal water supply for dust control. The contractor may apply for a permit to discharge wastewater directly into the nearest sewer, or wastewater may be temporarily stored on site for off-site disposal.

Hazardous or non-hazardous construction-generated waste, including existing soil stockpiles, would be hauled and disposed of at a licensed landfill permitted to accept the waste.

Phase 2: Construction of the Workforce Training Facility

Once the site has been prepared, LAHD would develop backland; construct a crane girder, lashing and electric equipment charging stations, and buildings; and install perimeter fencing, a crane, lighting, and other underground utilities. On the approximately 30-acre site, approximately 20 acres would be paved in preparation for construction of a parking lot, office buildings, trailers, and equipment training areas. Surface runoff from paved surfaces would be directed to the proposed storm drain system through the site grading completed under Phase 1 (Earthwork Improvements). Of the approximately 20 acres to be paved, approximately 4.6 acres of the western end of the Proposed Project site would likely be occupied by the approximately 20,000-square foot (SF) PMA office building, an approximately 300-space parking lot, an approximately 3,000-SF substation, three trailers totaling approximately 5,000 SF, an approximately 5,000-SF mechanic and repair building (M&R) to support both workforce training and on-site repairs for training equipment, and an approximately 3,000-SF lashing station (LAHD, 2023e). As discussed in Section 2.1.2, the final geometry of the site may vary depending on refinement of the final Project design. A proposed site plan is provided as Figure 2-2 in Section 2.1.2, but is subject to refinement as the Proposed Project design is further developed.

The Proposed Project site would include several outdoor training areas. Approximately 8 acres of the Proposed Project site would be developed for heavy lift, forklift, and utility tractor rig (UTR) training operations. Approximately 2.6 acres would be developed for crane training; approximately 1 acre would be developed for transtainer training; and approximately 3.85 acres would be developed for top handler and side pick training. Moveable K-rail fencing would be placed in the outdoor training areas.

The buildings that would be constructed would be used for indoor activities, such as crane simulators, personnel training, restrooms, break rooms, storage, strength and agility space, and conference rooms. Approximately 20,000 SF of the Proposed Project site (Figure 1) would be dedicated to PMA office space. One 100-person-capacity general safety training classroom and three 50-capacity general use classrooms would be constructed. All buildings would be Leadership in Energy and Environmental Design (LEED) certified.

The lighting for the entire Proposed Project site would include four 100-foot-high mast light poles, ten 80-foot flood lights, and twelve 30-foot light poles. Additional electrical improvements, including the installation of a new substation, at the site would include new utility services for the new office and M&R buildings, classrooms, site lighting, STS cranes, and electric vehicle and equipment charging infrastructure, including the construction of a new substation.

Heavy equipment for training operations would also be transported to the Proposed Project site for installation. The STS cranes may be transported in parts to the Proposed Project site by ship and truck and assembled on site. Smaller equipment such as the top handlers, side picks, forklifts, heavy lifts, UTRs, and payloaders may be transported by large truck.

Training equipment to be transported to the site would include the following (LAHD, 2023e):

- STS cranes
- Transtainer
- Top handlers
- Side pick
- Forklifts
- Heavy lifts
- UTRs
- Payloader
- Winch

Additional details about the training equipment to be used at the facility are described in Section 2.3.2, Operation.

Construction Workforce and Equipment

Up to 50 construction workers per day would be required for construction (LAHD, 2023b, 2023c).

Construction equipment for earthwork improvements under Phase 1 is anticipated to include the following (LAHD, 2023c):

- Tractor/loader/backhoes
- Scrapers
- Rollers
- Cement and mortar mixers
- Water trucks
- Rubber tired dozers
- Graders
- Paving equipment
- Excavators
- Dump trucks

Equipment to construct the training facility during Phase 2 is anticipated to include the following (LAHD, 2023c):

- Welders
- Forklifts
- Graders
- Tractor/loader/backhoes
- Cranes
- Generators
- Generator sets
- Air compressors
- Barges

Best Management Practices

The Proposed Project would include implementation of standard construction best management practices (BMPs) in accordance with the Proposed Project's construction Stormwater Pollution Prevention Plan (SWPPP) to comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit) (CGP) and any subsequent iterations for stormwater discharges associated with construction. Fuel would be stored on site to allow for on-site refueling of construction equipment. Industry-standard BMPs would be developed to ensure safe storage, prevent hazardous conditions, and minimize accidents. All equipment would be serviced and inspected before work. The construction contractor would prepare a Health and Safety Plan to address proper handling, storage, and disposal of hazardous materials used during construction.

Shore Road would provide the primary point of ingress and egress during construction (Figure 2-1). Construction traffic control would follow LAHD's On-Site Traffic Control requirements, which include providing temporary traffic controls such as flag persons, signs, and barricades necessary to control traffic during construction in conformance with the California Manual of Uniform Traffic Control Devices. Construction activities that affect traffic flow on the arterial system would be scheduled to off-peak hours to the extent practicable (POLA, 2023b). The construction contractor would be required to regulate speed on the Proposed Project site and laydown areas to minimize generating dust.

2.3.2 Operation

Operations at the Proposed Project site would consist of various types of training that would take place on a daily basis ranging from classroom training to hands-on equipment training. Proposed buildings and facilities to support training operations are described in Section 2.3.1, Construction (see "Phase 2: Construction of the Workforce Training Facility"). Shore Road would provide the primary point of ingress and egress during operation; a secondary egress on Anchorage Road would provide emergency access to comply with the City of Los Angeles Fire Department requirements. Regional access to the Proposed Project site is provided by SR-47 to the east, with local access provided by North Henry Ford Avenue to the east, Anchorage Road to the south, and Shore Road to the west (Figure 2-1). A proposed site plan is provided as Figure 2-2 in Section 2.1.2, which is subject to refinement as the Proposed Project design is further developed.

The facility operator would operate the Proposed Project site for 30 years, commencing in approximately 2029. Up to 150 full-time and part-time employees would work at the site in one shift during operations; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b, 2023c). The site would be open for operations on Monday through Friday between 7:00 a.m. and 5:00 p.m. regularly with night shift training, when necessary, occurring between 6:00 p.m. and 3:00 a.m.

Workers would be trained on the use of the following equipment (see Table 2-1):

- Two STS cranes
- One transtainer
- Four top handlers
- One side pick
- Four heavy lifts
- Six forklifts
- 14 UTRs
- Payloader
- Winch

Workers would also be trained on lashing and signaling procedures and maintenance and repair work. Training for longshore skills is part of an onboarding process administered by the PMA for entry level longshore workers. Longshore training would also include specific skills training for incumbent workers. Training for occupations in trucking and warehousing would involve coordination with academic institutions, employers, and union partners that would require space for the training on an as-needed basis. In addition to specific training programs across the various occupations mentioned, the Workforce Training Facility would focus on providing training opportunities on operation and maintenance of new zero emission cargo handling equipment such as battery electric and hydrogen fuel cell technology.

Maintenance of the Proposed Project would include mechanical maintenance and as-needed repairs of skill training equipment that would require coverage under the Stormwater Industrial General Permit (IGP) and proposed Commercial, Industrial, and Institutional (CII) Permit. Third-party vendors would provide daily cleaning services and as-needed HVAC servicing. Additional as-needed building repairs would be conducted sporadically by third-party vendors or contractors.

Table 2-1 provides photos and brief descriptions of the equipment to be used during training operations.

Table 2-1. Anticipated Training Equipment



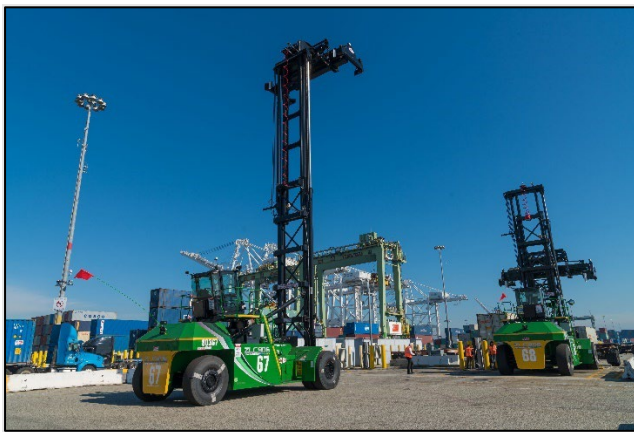
Ship-to-Shore (STS) Crane. A large dockside gantry crane used at container terminals to load and unload containers from cargo ships. A landside STS crane would be used at the Workforce Training Facility to simulate typical STS crane operations, without cargo ships at the site.



Transtainer. A large gantry crane consisting of parallel frame bars with crossbars that hold the crane mechanism over the container stacks. Used to load, unload, or stack containers.



Utility Tractor Rig (UTR). Semi-tractor used to move trailers within a cargo yard, warehouse facility, or intermodal facility.



Top Handler. A cargo container handler with an overhead boom used to lift containers up to 100,000 pounds.



Side Pick. A flexible front or side loader that can reach up to multiple stacks of containers.



Forklift and Heavy Lift. Used for the loading and unloading of goods over short distances.



Payloader. Machinery used to load and carry materials or large objects across a job site or to place loads into other vehicles or areas.



Winch. A device that holds a line or cable to keep a vessel tightly secured while docked.

Source: Crowley, Michael, 2021; Eusebio, Dustin, 2022; Flexport, 2023; Liebherr, 2023; Nautic Expo, 2023; Paceco Corp., 2021; World Ports Sustainability Program, 2023.

3.0 PROJECT PERMITS AND APPROVALS

Under CEQA, the lead agency is the public agency with primary responsibility over approval of a proposed project. Pursuant to the CEQA Guidelines (14 California Code of Regulations [CCR] 15367), the CEQA lead agency for the Proposed Project is LAHD.

The approvals or permits that could be required for the Proposed Project include, but would not be limited to, the following actions by the identified agencies:

- South Coast Air Quality Management District (equipment permits)
- Los Angeles County Regional Water Quality Control Board Storm Water Permits (Construction General Permit; Industrial General Permit; Commercial, Industrial & Institutional Permit, as applicable)
- City of Los Angeles Sanitation District Wastewater Permit
- City of Los Angeles Department of Building and Safety Permit
- City of Los Angeles Fire Department
- LAHD Entitlement, Port Master Plan Amendment, and Coastal Development Permit
- Port of Long Beach
- California Coastal Commission Port Master Plan Amendment (with concurrence by the California Coastal Commission)

4.0 INITIAL STUDY CHECKLIST

1	Project Title:	Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility
2	Lead Agency Name and Address:	Los Angeles Harbor Department (LAHD) Environmental Management Division 425 South Palos Verdes Street San Pedro, California 90731
3	Contact Person and Phone Number:	Nicole Enciso (310) 732-3615
4	Project Location:	1400 East Anchorage Road San Pedro Port of Los Angeles
5	Project Sponsor's Name and Address:	Los Angeles Harbor Department (LAHD) 425 South Palos Verdes Street San Pedro, California 90731
6	Port Master Plan Designation:	Planning Area 2, West Basin/Wilmington – Open Space
7	Zoning:	Qualified Light Industrial ([Q] M2-1), Heavy Industrial (M3)
8	Description of Project:	<p>The Proposed Project's construction would include site preparation such as grading, compacting, and paving as well as the construction of buildings, utilities, and accessory structures to support workforce training activities.</p> <p>The Proposed Project's operations would include providing skilled training programs that would replicate goods movement environments such as the use and operation of ship-to-shore cranes, transtainers, top handlers, side picks, forklifts, and heavy lifts, while providing a safe training environment for workers. The Pacific Maritime Association and International Longshore and Warehouse Union would participate in the Proposed Project as a workforce training facility to educate the current and future workforce on maritime and goods movement industries that serve the San Pedro Bay Port Complex (Port of Los Angeles and Port of Long Beach, collectively). LAHD would enter into a long-term entitlement at the Proposed Project site with a training facility operator to be identified in the future.</p>
9	Surrounding Land Uses/Setting:	The Proposed Project site is surrounded by a variety of uses ranging from liquid and dry bulk to recreational boating and open space. Nearby marinas include Island Yacht Anchorage, Cerritos Yacht Anchorage, Lighthouse

		Yacht Marina, Holiday Harbor, and Island Yacht Anchorage #2. WWL Vehicle Services, Americas, Inc. and Pasha Stevedoring & Terminals, LP are located approximately 0.26 mile northwest and 0.16 mile southwest of the Proposed Project site, respectively. Property owned by the Port of Long Beach is located adjacent to the north and east.
10	Other Public Agencies Whose Approval Is Required:	<ul style="list-style-type: none"> ▪ South Coast Air Quality Management District ▪ Los Angeles County Regional Water Quality Control Board ▪ City of Los Angeles Sanitation District ▪ City of Los Angeles Department of Building and Safety ▪ City of Los Angeles Fire Department ▪ City of Los Angeles Harbor Department ▪ Port of Long Beach ▪ California Coastal Commission Port Master Plan Amendment (with concurrence by the California Coastal Commission)
11	Have California Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21808.3.1?	No (refer to Section 5.18, Tribal Cultural Resources)

4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project (i.e., the Proposed Project would involve 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 checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input checked="" type="checkbox"/> Land Use Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

4.2 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.



02/01/2024

Signature

Date

Lisa Wunder, Acting Director
Environmental Management Division
City of Los Angeles Harbor Department

4.3 ENVIRONMENTAL CHECKLIST

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 IS 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 (U.S.) 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
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 points). 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. AGRICULTURE AND FORESTRY RESOURCES. 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. Would the project:				
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 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))?	<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"/>
3. AIR QUALITY. 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. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. BIOLOGICAL RESOURCES. Would the project:				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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"/>
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"/>
5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
6. ENERGY. Would the project:				
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"/>
7. GEOLOGY AND SOILS. Would the project:				
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"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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"/>
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"/>
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 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?	<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. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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 checked="" type="checkbox"/>	<input 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"/>
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater 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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; 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"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
11. LAND USE PLANNING. Would the project:				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
12. MINERAL RESOURCES. Would the project:				
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
13. NOISE. Would the project result in:				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 2 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 checked="" type="checkbox"/>	<input type="checkbox"/>
14. POPULATION AND HOUSING. Would the project:				
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 checked="" type="checkbox"/>	<input 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"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<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"/>
17. TRANSPORTATION. Would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES				
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), 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 Resources Code Section 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"/>
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. 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, 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 inadequate 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"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	<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"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5.0 ENVIRONMENTAL ANALYSIS

5.1 AESTHETICS

Discussion:

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

Less-than-Significant 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). No sensitive public viewpoints or scenic vistas are in the immediate Project vicinity; however, panoramic views of the Port and Pacific Ocean are available from distant public vantages. The site provides distant views of industrial and cargo activities at nearby terminals.

The Proposed Project's construction would include backfilling, grading, compacting, and installation of equipment and buildings, followed by operation of the Workforce Training Facility. Overall, the Proposed Project would blend in with the existing industrial visual character of the Port, as the areas surrounding the Proposed Project site are highly developed and include recreational, automobile shipping, and breakbulk cargo uses. The Proposed Project site is currently unoccupied, and the Proposed Project would include new buildings and training equipment, including large equipment such as STS cranes and transtainers (Table 2-1). Although the Proposed Project site is currently minimally developed, it has signs of previous disturbance such as abandoned utilities, soil and debris stockpiles, and other remnant abandoned refuse. Views of the site from adjacent public roads (Anchorage Road and Shore Road) are primarily obscured by the existing earthen berms and trees along the southern and western borders of the site. Furthermore, large equipment training operations would likely take place in the northeastern/central eastern portions of the Proposed Project site that would be at distances far enough to be minimally visible from nearby public vantage points (Figure 2-2).

While construction and operation of the Proposed Project would change the visual characteristics of the site, the Proposed Project would not have any substantial adverse effects on a scenic vista. The Proposed Project would not substantially affect overall views within the area, as the site is already disturbed and located on an elevated portion of land surrounded by earthen berms that block views of the site from public vantage points. The Proposed Project would be consistent with views that currently exist within the Port and would not degrade or block public views of any scenic vistas. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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 Proposed Project site is not visible from an eligible or designated State scenic highway. The nearest designated State scenic highway is located approximately 25 miles northwest of the Proposed Project site (State Route [SR]-91 post miles 9.2-13.4). The nearest eligible State scenic highway (State Highway 1 from SR-19 near Long Beach to Interstate [I]-5 south of San Juan Capistrano) is approximately 6 miles northeast of the Proposed Project site (Caltrans, 2018). In addition to California Department of Transportation (Caltrans)-designated State scenic highways, the City of Los Angeles has city-designated scenic highways, but the Proposed Project site is not visible from any of these highways (City of Los Angeles, 2016). No scenic resources, including but not limited to trees, rock outcroppings, or historic buildings, within a State scenic highway could be substantially damaged by the Proposed Project. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

c. Would the project, 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?

Less-than-Significant Impact. The Proposed Project site is located in an urbanized area and would not conflict with any applicable zoning and land use regulations governing scenic quality. Although the Proposed Project would include the construction of new buildings and installation of training equipment, including STS cranes and transtainers, the Proposed Project site is currently zoned qualified-light industrial ([Q]M2-1) and Heavy Industrial (M3), and the Proposed Project would not require any changes to the existing zoning (City of Los Angeles, 2023). In addition, the Proposed Project site has been disturbed by previous construction activities and stockpiling. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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

Less-than-Significant Impact. The Proposed Project site is currently unoccupied and does not contain lighting. As described in the Section 2.3, Project Description, four 100-foot-high mast light poles, ten 80-foot-high flood lights, and twelve 30-foot-high light poles would be installed where needed throughout the Proposed Project site. The nighttime lighting environment in the Proposed Project vicinity consists mainly of ambient light produced from street lighting adjacent to the Proposed Project site, marinas, parking lots, and other facility lighting at the Port. The primary source of nighttime 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 high-intensity boom lights during construction or operation. While the Proposed Project would install new lighting structures along the perimeter of the site, which would include high mast light poles that would be used during night shift training between 6:00 p.m. and 3:00 a.m., the design would follow backlight, up-light, and glare (collectively referred to as “BUG”) requirements contained in building code requirements. Lighting would be directed toward the Proposed Project site rather than toward the water or liveaboard tenants, which may potentially be on boats at the marinas to the north, south, and west of the Proposed Project site. The Proposed Project would not produce substantial light or glare which would affect day or nighttime views of the area. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

5.2 AGRICULTURE AND FORESTRY RESOURCES

Discussion:

- 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 California Department of Conservation’s (DOC) Farmland Mapping and Monitoring Program identifies the Proposed Project site as Other Land, which is defined as land not included in any other mapping category or vacant and nonagricultural land surrounded by urban development and greater than 40 acres (DOC, 2022). The Proposed Project site is located within an industrial area and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance that would be converted to accommodate the Proposed Project. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

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

No Impact. The Williamson Act aims to preserve agricultural and open space lands by restricting use to farming and ranching uses through a contract between local governments and private landowners (DOC, 2023b). The Proposed Project site is zoned qualified-light industrial ([Q]M2-1) and Heavy Industrial (M3) under the City of Los Angeles Zoning Ordinance, and no agricultural zoning designations or agricultural uses are within the Proposed Project limits or adjacent areas (City of Los Angeles, 202). No agricultural or open space land with Williamson Act contracts is located within the Proposed Project site. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- 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 5.2(b) above, the Proposed Project site is zoned for qualified-light industrial uses ([Q]M2-1) and Heavy Industrial (M3) under the City of Los Angeles Zoning Ordinance, and no forest land is within or near the Proposed Project site (City of Los Angeles, 2023). The Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

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

No Impact. The Proposed Project site is located in the northern portion of the Port, which does not include forest land. The Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- 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, no Farmland or forest land are within the Proposed Project site or the surrounding area. The Proposed Project site is located in a highly urbanized and industrial area. The Proposed Project would not involve changes in the existing environment that could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.3 AIR QUALITY

Discussion:

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

Potentially Significant Impact. The Proposed Project would result in increased emissions of criteria air pollutants associated with site preparation, building construction, and training operations, which would include employee and trainee vehicle trips. Project construction activities are estimated to take approximately 36 months for both phases. Emissions from operations would last over the duration of the entitlement term (30 years).

Additional analysis is required to determine whether the Proposed Project would conflict with applicable air quality plans, including the Air Quality Management Plan for the South Coast Air Basin and the Clean Air Action Plan. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

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?

Potentially Significant Impact. The South Coast Air Basin has a history of non-attainment conditions and violations of the ambient air quality standards. The Proposed Project, in conjunction with other related projects, has the potential to make a substantial contribution to significant cumulative air quality impacts. Additional analysis is required to determine whether the Proposed Project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is designated non-attainment status. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

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

Potentially Significant Impact. Sensitive receptors are members of the population that are particularly susceptible to adverse health impacts from air contaminants. The following are land uses where sensitive receptors are typically located: residences, schools, playgrounds, childcare centers, and health care facilities. No schools, playgrounds, childcare centers, or health care facilities are within or adjacent to the Proposed Project site. The nearest schools, Wilmington Park Elementary School and George De La Torre Junior Elementary School, are located approximately 1.1 miles north and northwest of the Proposed Project site, respectively. No residential zoning is located within the Port,¹ although liveaboard tenants may potentially be on boats at the marinas to the north, south, and west of the Proposed Project site. Sensitive receptors may also be located within nearby residential communities to the north and northwest of the Proposed Project site.

Construction activities may expose sensitive receptors to air pollution in the form of combustion exhaust and fugitive dust. Operational activities, including the workforce training operations, may also expose sensitive receptors to increased levels of criteria air pollutants. According to the Baseline Soil, Soil Vapor, and Groundwater Investigation Report prepared by Ninyo & Moore on behalf of LAHD, VOCs are present in soil vapor, and the Proposed Project site is within a methane zone per the City of Los Angeles Municipal Code. Occupants inside the proposed buildings may be exposed to VOC concentrations and methane (Ninyo & Moore, 2023b).

¹ Residential housing is not a permitted use at the Port of Los Angeles under the state's Tidelands grants.

Additional analysis is required to determine whether the Proposed Project would expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

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

Potentially Significant Impact. Construction of the Proposed Project may cause odors from the use of diesel-powered heavy equipment and fueling activities. Odors from operation of the Proposed Project would be from vehicle and equipment operation by employees and trainees and may affect nearby receptors such as liveboard tenants and recreational visitors at the adjacent marinas. Additional analysis is required to determine whether the Proposed Project would result in emissions such as odors that may adversely affect a substantial number of people. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

5.4 BIOLOGICAL RESOURCES

Discussion:

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?

Potentially Significant Impact. The Proposed Project site is vacant land that has been disturbed by previous construction activities and stockpiling. Over time, the site has developed conditions that support a mosaic of native and non-native species with several wildlife habitats including an alkali pond, seasonal freshwater pools, saltbush shrublands, and fields of herbaceous species. Several special-status species were observed on the Proposed Project site. During site visits conducted on April 10 and May 22, 2023, biologists with Aspen Environmental Group (Aspen) observed numerous native and non-native species of plants. Of these, three special-status species were observed including southern tarplant (*Centromadia parryi ssp. Australis*), estuary seablite (*Suaeda esteroa*), and woolly seablite (*Suaeda taxifolia*). Aspen biologists also observed numerous species of wildlife on the Proposed Project site, including two special-status species, the Belding's savannah sparrow (*Passerculus sandwichensis beldingi*) and burrowing owl (*Athene cunicularia*). Several additional species of special-status plants and animals also have a moderate to high potential to be present within the Proposed Project site.

Additional analysis is required to determine whether the Proposed Project would have a substantial adverse effect on candidate, sensitive, or special-status species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- 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?**

Potentially Significant Impact. As discussed above, the Proposed Project site has several wildlife habitat or natural communities present such as an alkali pond, seasonal freshwater pools, saltbush shrublands, and fields of herbaceous species. While none of these are riparian habitat, they may be recognized as sensitive natural communities as identified in City or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additional analysis is required to determine whether the Proposed Project would have a substantial adverse effect on sensitive natural communities. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- 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?**

Potentially Significant Impact. As discussed above, an alkali pond and several seasonal freshwater pools are present on the Proposed Project site. These aquatic features appear to be isolated and do not connect to traditional navigable waters, which would likely exclude these features from being federally protected wetlands, regulated by the U.S. Army Corps of Engineers (USACE). These features are likely to be regulated by the Los Angeles Regional Water Quality Control Board (LARWQCB) and California Department of Fish and Wildlife (CDFW) as wetlands or jurisdictional lakebeds. In addition to the ponds and pools within the Proposed Project site, a tidal wetland is present along Shore Road, less than 50 feet from the northwest corner of the Proposed Project site. These adjacent wetlands are expected to fall under the jurisdiction of the USACE, LARWQCB, and CDFW but are not expected to be directly affected by the Proposed Project. Potential indirect impacts on these adjacent wetlands could result from runoff during construction or unauthorized discharge from the Proposed Project site, or changes in site drainage that could reduce natural flows into the wetland. Best management practices (BMPs) would be implemented in accordance with SWPPP requirements related to construction to comply with the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit) (CGP) and any subsequent iterations for stormwater discharges associated with construction. In addition, the Proposed Project site would be graded to direct surface runoff from paved surfaces towards the proposed storm drain system and not into the adjacent wetlands. However, additional analysis is required to determine whether the Proposed Project would have a substantial adverse effect on protected wetlands. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- 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?**

Potentially Significant Impact. The Proposed Project site is a largely isolated land block of wildlife habitat surrounded by industrial and commercial development. The Proposed Project site is expected to support localized movement of some species, such as coyotes (*Canis latrans*) within the Port but is not expected to support migratory pathways or wildlife corridors. The site does provide nursery sites for many species including a den site for coyote and nest sites for many birds including mallards (*Anas platyrhynchos*) and other native species. Nesting birds are protected by the Migratory Bird Treaty Act and California Fish and Game Code.

The Proposed Project is not expected to adversely affect the movement of any native resident or migratory fish or wildlife species or adversely affect established native resident or migratory wildlife corridors. The Proposed Project does have the potential to adversely affect the use of native wildlife nursery sites on the Proposed Project site if the Proposed Project activities cause direct physical disturbance of the nursery sites or result in nuisance impacts from noise. Additional analysis is required to determine whether the Proposed Project would interfere substantially with native wildlife nursery sites. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- e. **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

No Impact. The Proposed Project site is located in a disturbed area with a mosaic of native and non-native vegetation that continues to be frequently disturbed. This on-going disturbance regime has prevented the establishments of native trees on the Proposed Project site. A limited number of non-native ornamental trees may be removed as part of the Proposed Project, but no native trees are expected to be affected. The only biological resources protected by the City's Ordinance (Ordinance No. 177404) pertain to specific tree species including oak trees, Southern California black walnut, Western sycamore, and California Bay. All trees observed onsite are non-native, none of which are protected by the City's Ordinance. The Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, the Proposed Project would result in no impacts, and this topic will not be addressed further in the EIR.

- 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?**

No Impact. No adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other similar plans overlap with the Proposed Project area (USFWS, 2023). The nearest conservation plan area is the Rancho Palos Verdes Natural Community

Conservation Plan area, which is located over 4 miles west of the Proposed Project area (City of Rancho Palos Verdes, 2019). 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 and is located roughly 4 miles southwest of the Proposed Project site. The Proposed Project would not disturb the nesting site on Pier 400 because of the distance of the Proposed Project site from the SEA. The Proposed Project would not conflict with adopted conservation plans related to biological resources. Therefore, the Proposed Project would result in no impacts, and this topic will not be addressed further in the EIR.

5.5 CULTURAL RESOURCES

Discussion:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Less-than-Significant Impact. A review of historic aerial photographs identified that holding tanks once occupied the site from 1952 to 1993. While the Proposed Project site is currently vacant, the Proposed Project's activities have the possibility of encountering unknown buried resources during earthwork. In the unlikely event that any prehistoric artifact of historic period materials or bone, shell or nonnative stone is encountered during construction activities, work shall be immediately stopped, the area secured, and work relocated to another area until the found materials can be assessed by a qualified archaeologist. Examples of such cultural materials might include historical trash pits containing bottles and/or ceramics; structural remains or concentrations of grinding stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; and flakes of stone not consistent with the immediate geology such as obsidian or fused shale. The contractor shall stop construction within 30 feet of the location of these finds until a qualified archaeologist can be retained to evaluate the find. If the resources are found to be significant, they shall be avoided or shall be mitigated consistent with State Historic Preservation Officer Guidelines. Adherence to existing regulatory requirements and the construction specifications for the inadvertent discovery of archaeological resources would ensure that no significant impacts on historical resources would result from the construction of the Proposed Project. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Potentially Significant Impact. The Proposed Project's activities have the possibility of encountering unknown buried resources during earthwork. The standard measures discussed above would be implemented during construction of the Proposed Project.

However, additional analysis is required to determine whether the Proposed Project may result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

No Impact. No known cemeteries or burials are known to occur at the Proposed Project site, and the site is underlain by a variable mix of sands, silts, and clay consistent with the estuarine deposits in the area and the hydraulic fill dredge material used to construct the nearby islands (Ninyo & Moore 2022). Neither of these deposits are considered sensitive for human remains, historically or prehistorically. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.6 ENERGY

Discussion:

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 consumption of energy resources in the form of non-renewable fossil fuels and electricity for site power. Construction would involve the short-term use of transportation fuels and electricity by various equipment, such as off-road equipment. Construction would take approximately 36 months. Construction would not require a substantial use of electricity as most equipment would be powered by diesel, gasoline, or propane. Operations would require electric power and transportation fuels, primarily gasoline and diesel, due to equipment and vehicles accessing the site and the operation of training equipment, such as STS cranes, transtainers, utility tractor rigs, and top handlers, over the duration of the entitlement term (30 years). Over time, and by 2030, all cargo handling equipment would transition to zero-emissions equipment (battery electric and hydrogen fuel cell).

The Los Angeles Department of Water and Power (LADWP) would provide electrical services to the Proposed Project site. LADWP has an electrical transmission capacity of about 8,019 megawatts and serves over 4 million residents and businesses in the City of Los Angeles (LADWP, 2023). LADWP participates in Statewide policies and programs that promote the use of renewable resources in the electricity supply and reduction in the carbon-intensity of transportation fuels. Implementation of the State of California's Low-Carbon Fuel Standard regulations and the State's long-term goal for carbon neutrality by 2045 or earlier require transportation fuels used in California to transition to renewable fuel sources or zero-emission technologies. The electricity supply is on a long-term trend of decarbonization as a result of California's Renewable Portfolio Standard. Over time, increasing portions of the Proposed Project's energy use would be provided from renewable supplies that would decrease the

Proposed Project's use of non-renewable fuels. The energy necessary to develop and operate the proposed facilities would be used efficiently and would represent a negligible portion of state-wide energy consumption.

Construction and operation of the Proposed Project would be consistent with existing land uses in the Port's Wilmington area and would provide workforce training services to help meet the workforce demands of the San Pedro Bay Port Complex. One of the Proposed Project's primary objectives is to meet the goal of transitioning to zero-emissions cargo handling equipment by 2030 and zero-emissions drayage trucks by 2035. Not only would operational training equipment transition to zero-emissions, but workforce training activities would support Port-wide zero-emissions equipment handling. Therefore, the Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, nor would the Proposed Project introduce unnecessary energy consuming equipment or processes. Furthermore, the use of energy to power zero-emissions equipment and vehicles would reduce environmental impacts associated with air emissions over the long-term operation of the Proposed Project. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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 include construction and operation of a workforce training facility to train local workers in Port maritime and goods movement industries, up-skill and re-skill workers, and meet local zero-emissions goals by transitioning to zero-emissions cargo handling equipment and vehicles. The Proposed Project would not conflict with adopted state or local renewable energy or energy plans. The Proposed Project would support Port-wide energy goals of zero-emissions cargo handling equipment by 2030 and zero-emissions drayage trucks by 2035. The Proposed Project would not require the removal of any existing renewable energy infrastructure, such as solar or wind-powered electric generating facilities.

The City of Los Angeles would need to issue Building and Safety Permits for new buildings and would ensure compliance with 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). LAHD is responsible for design, inspection, management, and oversight of construction projects to ensure projects comply with energy efficiency requirements. The energy necessary to develop and operate the proposed facilities would be used efficiently and would represent a negligible portion of state-wide energy consumption. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

5.7 GEOLOGY AND SOILS

Discussion:

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.**

Less-than-Significant Impact. The Proposed Project site is located in a seismically active area of southern California. The closest Alquist-Priolo zoned fault is the Newport-Inglewood fault zone located approximately 4.5 miles northeast of the Proposed Project site (CGS, 2023); fault rupture from this fault is not anticipated due to the fault's distance from the site. The Compton thrust fault crosses the Proposed Project site (USGS, 2023a). While this fault is a buried blind thrust fault that does not reach the surface and would not result in primary surface fault rupture in the event of an earthquake, a large earthquake on the Compton thrust fault could result in secondary fault related fractures due to underlying earthquake related folding.

Although the Proposed Project site is underlain by a blind thrust fault, and employees and trainees would be present either within the proposed buildings or outside for equipment training, all buildings would be built according to state and local building codes related to seismic safety. Incorporation of modern standard engineering and safety standards in the Proposed Project design and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse effects on people and structures. Emergency planning and coordination would also reduce injuries to on-site personnel during seismic activity. With incorporation of emergency planning and compliance with current regulations and standard engineering practices, the Proposed Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

ii) **Strong seismic ground shaking?**

Less-than-Significant Impact. As discussed above, the Proposed Project site is located in a seismically active area of southern California with numerous on- and offshore active faults capable of generating large earthquakes and significant seismic ground shaking in the Proposed Project area. Faults in the Proposed Project vicinity include the Compton thrust fault, Cabrillo fault, Palos Verdes fault zone, and Newport-Inglewood-Rose Canyon fault zone (USGS, 2023a). Offshore

faults in the Proposed Project vicinity include the offshore sections of the Palos Verdes and Newport-Inglewood-Rose Canyon fault zones (USGS, 2023a).

The Proposed Project site may experience strong to very strong ground shaking from a large earthquake on any of these faults. The exposure of people and structures to seismic ground shaking is a potential risk with or without the Proposed Project and cannot be avoided. However, as discussed above, incorporation of modern standard engineering and safety standards in the Proposed Project design and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse effects on people and structures. Emergency planning and coordination would also reduce injuries to on-site personnel during seismic activity. With incorporation of emergency planning and compliance with current regulations and standard engineering practices, the Proposed Project would not cause potential substantial adverse effects involving strong seismic ground shaking. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Less-than-Significant Impact. The Proposed Project site is located within a mapped California Geological Survey liquefaction zone (CGS, 2023). Hydraulic and alluvial fill are common in the Port and harbor areas, and in conjunction with shallow groundwater levels, these areas are subject to liquefaction and lateral spreading in the event of large earthquakes. However, incorporation of modern standard engineering and safety standards in the Proposed Project design, and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse effects on people and structures. With incorporation of these standards and compliance with current requirements, the Proposed Project would not cause potential substantial adverse effects involving seismic-related ground failure. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

iv) Landslides?

No Impact. The Proposed Project site and surrounding area are generally flat to gently sloping with some hummocky topography due to soil stockpiles and are not located within a mapped California Geological Survey landslide hazard zone (CGS, 2023). The Proposed Project site and immediately surrounding area would not be subject to landslides due to natural causes, Project construction, or seismic events. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

b. Result in substantial soil erosion or the loss of topsoil?

Less-than-Significant Impact. The Proposed Project would include grading and excavation activities during construction that would loosen soils and could contribute to surface erosion. The Proposed Project would be subject to the requirements of the National Pollution Discharge Elimination System (NPDES) Stormwater Program, which requires obtaining coverage under the General Permit for Discharges of Stormwater Associated with Construction and Land Disturbance Activities, and the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Compliance with NPDES and SWPPP requirements, including any erosion and sediment controls identified in the SWPPP, would reduce the potential for soil erosion. After construction, the Proposed Project site would be completely paved, which would prevent erosion during operation. The Proposed Project would not result in substantial soil erosion or the loss of topsoil. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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?

Less-than-Significant Impact. As discussed in Section 5.7(a), the Proposed Project site is generally flat to gently sloping and would not be subject to landslides. The Proposed Project site is located in an area of regional subsidence due to oil extraction (USGS, 2023b), as the site is located within the Wilmington Oil Field with 24 oil wells on site (Ninyo & Moore, 2022). However, all these oil wells are either plugged (i.e., nonoperational) oil and gas, plugged water source, or plugged multipurpose wells. Therefore, the Proposed Project would not be vulnerable to subsidence, as no extraction of petroleum products would be required as part of the Proposed Project and the plugged wells are sealed to prevent the migration of fluids (DOC, 2023c). Dewatering of surface water and groundwater during construction may be required to remove an existing alkali pond and several seasonal freshwater pools on the Proposed Project site; however, following dewatering, the areas would be backfilled, and existing soil to be retained on site would be strengthened by using a combination of surcharge and vertical wick drains to accommodate the proposed facility.

The Proposed Project site could be subject to liquefaction or lateral spreading in the event of a large earthquake on nearby or regional faults. The potential for adverse effects from liquefaction or lateral spreading would be minimized with incorporation of modern standard engineering and safety standards in the Proposed Project's design for geotechnical and structural improvements, and through compliance with LAHD engineering criteria, current Los Angeles Building and Municipal Codes, and California seismic codes and standards. With incorporation of current standards and geotechnical engineering requirements, the Proposed Project would not result in on- or off-site lateral spreading, liquefaction, or collapse. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- 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?**

Less-than-Significant Impact. Clay and silty clay materials were identified at the Proposed Project site during geotechnical sampling (EMI, 2022). Expansive soils may exist at the Proposed Project site that could result in adverse impacts on Project structures such as cracking and distress of foundations. The required geotechnical investigation to comply with County of Los Angeles and Los Angeles Department of Building and Safety building codes and design requirements would identify any expansive soils, and appropriate design measures would be incorporated as part of the Proposed Project design. Recommendations from the geotechnical investigation regarding expansive soils would be implemented in compliance with City of Los Angeles and LAHD engineering criteria, LAHD Engineering review recommendations, and the Los Angeles Building and Municipal Codes. With compliance with geotechnical recommendations, standard engineering practices, and engineering criteria and regulations, the Proposed Project would not create substantial direct or indirect risks to life or property related to expansive soils. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- 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?**

No Impact. The Proposed Project would include connections to municipal sanitary sewer lines. Septic tanks and alternative wastewater disposal would not be used. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- f. **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

No Impact. The Proposed Project site is underlain by a mixture of interbedded sands, silts, and clays consistent with estuarine deposits in the area as well as the hydraulic fill dredge material that was used to construct adjacent islands (Ninyo & Moore, 2022). These units have no paleontological sensitivity, and therefore, proposed ground disturbing activities have no potential to damage or destroy unique paleontological resources. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.8 GREENHOUSE GAS EMISSIONS

Discussion:

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

Potentially Significant Impact. The Proposed Project's construction and operation activities would result in temporary direct and indirect greenhouse gas (GHG) emissions from the use of fuels and electricity for various equipment and vehicles. Construction would take approximately 36 months. The Proposed Project's operations would include the use of an approximately 20,000-SF office building, 3,000-SF substation, three trailers, an approximately 5,000-SF M&R building, and heavy equipment including an STS crane, transtainer, heavy lifts, and top handlers for workforce training activities that would result in GHG emissions over the duration of the entitlement term (30 years). Additional analysis is required to determine whether the Proposed Project would generate direct and indirect GHG emissions that may have a significant impact on the environment. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- 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?**

Potentially Significant Impact. The sources of GHG emissions caused by the Proposed Project during development of the site and operation as a training facility may have the potential to conflict with plans or policies adopted for the purpose of achieving GHG emission reductions. Therefore, impacts would be potentially significant, and this impact will be discussed in the EIR.

5.9 HAZARDS AND HAZARDOUS MATERIALS

Discussion:

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

Less-than-Significant Impact. The Proposed Project would involve limited transport, storage, use, and disposal of hazardous materials during construction and operation. Some examples of hazardous materials handling during construction include the transport of fuels, lubricants, and solvents associated with construction equipment, as well as the transport of contaminated soils excavated from the Proposed Project site. Contaminated soil is present on site and may be encountered during Project construction. Contaminated soil would need to be handled and disposed of at an appropriate landfill per local, state, and federal requirements. The construction contractor would prepare a Health and Safety Plan to address proper training, handling, storage, and disposal of hazardous materials used during construction.

Ninyo & Moore prepared a Stockpiled Soil and Debris Characterization Sampling Report on behalf of LAHD on May 31, 2023 (Ninyo & Moore, 2023a) and an Addendum to Stockpiled Soil Sampling Report on November 20, 2023 (Ninyo & Moore, 2023c). Soil stockpile samples contained TPH in the gasoline range organics (GRO), diesel range organics (DRO), and motor oil range organics (MRO), volatile organic compounds (VOCs), Title 22 metals, organochlorine pesticides (OCPs), polychlorinated biphenyls (PCBs), and polycyclic aromatic hydrocarbons (PAHs) that exceeded LAHD and POLB's acceptable concentrations for reuse (Ninyo & Moore, 2023a and 2023c). Some of the tested stockpiled soils exceed regulatory industrial soil screening levels but would not be classified as hazardous waste. Some stockpiled soils were identified with elevated Soluble Threshold Limit Concentration (STLC) test concentrations for copper and lead that would classify them as hazardous waste (Ninyo & Moore, 2023a and 2023c). Contaminated stockpiled soils that exceed regulatory industrial screening levels, but are not classified as hazardous waste would need to be identified and removed from the site and disposed of at an appropriate landfill per local, state, and federal requirements. All hazardous soils removed offsite would need to be accompanied by a waste manifest, which is reported to the California Department of Toxic Substances Control (DTSC). Grading and excavation for the Proposed Project could expose construction workers to hazardous materials in stockpiled soils. Construction workers would maintain proper HAZWOPER training and be qualified to work with contaminated materials.

Concrete stockpile samples contained low levels of Title 22 metals, VOCs, PCBs, and asbestos, all of which were below the hazardous waste screening criteria for waste characterization purposes. The report recommended that the sampled concrete stockpile materials be characterized as non-hazardous for waste disposal purposes or be crushed and used as crushed miscellaneous base beneath pavement during site construction (Ninyo & Moore, 2023a).

Hazardous materials that could be used during Proposed Project operation include lubricants, solvents, acids, and fuels for the training equipment and vehicles. When not in use, these hazardous materials would be stored in approved containers and in a proper manner to prevent drainage, leaks, or accidents as required by State and local regulations. Construction and operational equipment would be refilled or refueled in areas away from high-traffic areas and near a spill containment kit or containment kit area. With compliance with standard safety measures, hazardous waste regulations, and the requirement that construction workers maintain proper HAZWOPER training, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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?

Potentially Significant Impact. As described under the discussion for Section 5.9(a), the Proposed Project's construction and operation activities would require the limited use of hazardous materials, such as fuels, lubricants, and solvents. The storage and use of hazardous materials during construction and operation could result in the accidental release of hazardous materials typically associated with minor spills or leaks. Spills and leaks of hazardous materials during construction or operation could result in contamination of soil or the adjacent harbor if not cleaned up quickly or completely. In addition, Project construction may expose construction workers and the environment, including soil, groundwater, and the harbor, to hazardous materials/waste. During storm events, spills or leaks of hazardous materials could infiltrate soils causing contamination of underlying soil or the groundwater, or runoff into the harbor and adversely affect harbor water quality and marine life. During Project operation, spills or leaks would not infiltrate soils, as all land-based operations would take place on paved surfaces. Some of the stockpiled soils on the Proposed Project site contain contaminated soils that exceed industrial regulatory screening levels, and some soils were found to have contamination levels that would classify them as hazardous waste (Ninyo & Moore, 2023a).

Additionally, the EDR database and GeoTracker website did identify one open California Cleanup Program site immediately adjacent to and north of the Proposed Project site (EDR, 2023; SWRCB, 2023c). The Cleanup Program site is identified as a former oil field and oil field waste disposal landfarm, which was in operation between 1948 and 1970 (URS, 2009). At this site, oil field wastes and liquids were disposed of into 19 shallow, below-ground, clay-lined impoundments (sumps) in a manner that reportedly did not conform to the site disposal permits (URS, 2009). The sump areas were excavated in 2008 and 2009 and backfilled with clean import soils; a total of approximately 234,880 cubic yards of contaminated soil was removed (URS, 2009). The oil wells on the site were capped and pipelines relocated prior to site excavation (URS, 2009). Although unlikely, contamination from this site may have a small potential to migrate to the Proposed Project site with seasonal or tidal movement of shallow contaminated groundwater.

Grading and excavation for the Proposed Project could expose workers or the environment to hazardous materials or waste if a release of these substances occurs. Additional analysis is required to determine whether the Proposed Project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- c. **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. No schools are within one-quarter mile of the Proposed Project site. The nearest schools, Wilmington Park Elementary School and George De La Torre Junior Elementary School, are located approximately 1.1 miles north and northwest of the Proposed Project site, respectively. No impact would result from the Proposed Project, and this issue will not be addressed further in the EIR.

- d. **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 Proposed Project site is not listed on any of the CalEPA Cortese List Data Resources,² including the DTSC EnviroStor website (DTSC, 2023), the State Water Resources Control Board (SWRCB) GeoTracker website (SWRCB, 2023a), and SWRCB Cease and Desist Orders and Cleanup and Abatement Orders list (SWRCB, 203b). Additionally, the site is not listed in any environmental databases (EDR, 2023). Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- e. **For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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 closest airports to the Proposed Project site are the Torrance Municipal Airport – Zamperini Field, located over 5 miles to the north-northwest; and the Long Beach Airport, located approximately 6 miles to the northeast. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- f. **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less-than-Significant Impact. While most construction activities would take place outside of public roadways, periodic temporary construction or maintenance activities, such as transport of heavy equipment, may temporarily block lanes. The Proposed Project would not physically interfere with an adopted emergency response plan, as coordination with both the Los Angeles Fire Department and the Los Angeles Port Police would be conducted prior to construction activities. Emergency access in the vicinity of the Proposed Project site would be maintained for emergency service vehicles during construction activities, as construction traffic would be intermittent during construction

² <https://calepa.ca.gov/sitecleanup/corteselist/>

hours throughout the 36-month construction period. Road closures are not anticipated during construction activities. The Proposed Project is not expected to increase demand on existing emergency response services during construction or operation and is not expected to substantially affect traffic circulation or disrupt emergency response or evacuation. The Proposed Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The Los Angeles Fire Department (LAFD) provides fire protection services within the Port. The Proposed Project is not located within the wildland-urban interface area (i.e., the zone of transition between undeveloped land with vegetative fuels and human development). Additionally, the Port and Proposed Project area are listed as “not burnable” on the US Forest Service Wildfire Hazard Potential website (USFS, 2020). No wildland fires have the potential to occur in the Proposed Project area. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.10 HYDROLOGY AND WATER QUALITY

Discussion:

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

Less-than-Significant Impact. Best management practices (BMPs) would be implemented in accordance with SWPPP requirements related to construction to comply with the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit) (CGP) and any subsequent iterations for stormwater discharges associated with construction. Implementation of BMPs in accordance with the SWPPP would reduce erosion, siltation, and the potential for accidental or incidental discharges to the storm drain or harbor waters. The Proposed Project would include construction of a storm drain system to convey stormwater flows off site during operations.

Proposed Project operations would adhere to the Regional Water Quality Control Board (RWQCB) Stormwater Industrial General Permit (IGP) and proposed Commercial, Industrial, and Institutional (CII) Permit, as applicable, to reduce the potential for accidental or incidental discharges to the storm drain and harbor waters. By complying with required permits, the potential for discharges that could affect water quality would be substantially reduced, and as a result, Proposed Project construction and operation would not violate

any water quality standards or waste discharge requirements or substantially degrade surface water or groundwater quality. Therefore, potential impacts would be less than significant, and this issue will not be further addressed further in the EIR.

- 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?**

No Impact. Groundwater in the harbor area is located south of the Dominguez Gap Barrier and experiences seawater intrusion from the San Pedro Bay, rendering it unsuitable for potable uses. Further, the Proposed Project site is not used or designated for groundwater recharge. Excavation may be necessary for construction of Project components. Because the Proposed Project site is not used for groundwater recharge or other groundwater-related beneficial uses, paving of the site would not interfere with groundwater recharge. The Proposed Project may require dewatering of groundwater but would not require the use of groundwater during construction or operations. The Proposed Project would not impede sustainable groundwater management of the basin. Therefore, the Proposed Project would have no impacts, and this issue will not be addressed further in the EIR.

- 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;**

Less-than-Significant Impact. The Proposed Project would have no impact on the course or configuration of any water body because no streams or rivers are within the Proposed Project site. Earthen berms are located to the south and west generally along the boundaries of the Proposed Project site. The Proposed Project site would be graded and paved, and stormwater flows would be conveyed to the storm drain system. Any excess soil material left over after grading would be used to construct an earthen berm wall along the perimeter of the Proposed Project site.

The Proposed Project would increase impervious areas through new paved surfaces. The Proposed Project site would be compacted and graded as part of site preparation, which would alter the site's existing draining pattern. Construction would comply with the stormwater-related requirements in the NPDES Permit, including the use of BMPs, which would minimize the amount of runoff and the potential for substantial erosion or siltation. During construction, contractors would develop and follow a SWPPP compliant with the requirements of the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities CGP and any subsequent iterations for stormwater discharges associated with construction. Compliance with this construction SWPPP, including any erosion and sediment controls identified in the SWPPP, would further reduce potential impacts.

During operation, the Proposed Project would be covered under the Los Angeles County RWQCB Stormwater Permits, including the IGP and the proposed CII Permit, as applicable. After construction is completed, the Proposed Project's drainage would be handled by the new storm drain system, which would convey stormwater off site. As required under the IGP, a SWPPP would be developed and employed, and would include measures to reduce pollutants from entering the storm drain system. With compliance with the SWPPP and new stormwater drainage plan, the Proposed Project would not substantially alter the existing drainage pattern of the site in a manner which would result in substantial erosion or siltation on or off site. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

(ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;

Less-than-Significant Impact. The Proposed Project would not change the vulnerability of the Proposed Project site to flooding because the site would be higher in elevation than the surrounding area, and the Proposed Project would not remove barriers to flooding since no barriers are located on the site. The Proposed Project would include the installation of impervious paving after grading and compacting, resulting in a potential for increased surface runoff. However, the site would be graded to direct surface runoff towards the proposed storm drain system, thereby reducing the potential for flooding on or off site. The Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

(iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less-than-Significant Impact. The Proposed Project has the potential to increase stormwater runoff with the addition of new impervious areas, and stormwater runoff may contain particulate matter or industrial chemicals that could enter harbor waters. Hazardous material has the potential to enter harbor water during construction, particularly during mobilization of construction vehicles, equipment, and delivery of training equipment if contaminants leak from vehicles and equipment onto Anchorage Road and Shore Road, which are adjacent to the marinas. During construction, contractors would develop and follow a SWPPP compliant with the requirements of the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities CGP and any subsequent iterations for stormwater discharges associated with construction.

During operation, the Proposed Project would require coverage under the IGP and proposed CII permit, as well as development of a new project-specific SWPPP. Compliance with these requirements would reduce the potential for polluted runoff to enter into harbor water.

LAHD would also grade the Proposed Project site such that storm flows would not enter harbor water as runoff during construction and operations. The Proposed Project would not exceed the capacity of the new stormwater drainage systems nor create substantial additional sources of polluted runoff. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

(iv) Impede or redirect flood flows?

Less-than-Significant Impact. The Proposed Project site is within Federal Emergency Management Agency (FEMA) Zone X, in which it is an area with reduced flood risk due to being outside the 500-year flood zone and protected from the 100-year flood by levee (FEMA, 2021). The Proposed Project site is currently relatively flat with inclines in the southeast, eastern, and northeastern corners and central-western portion of the site. Earthen berms are located to the south and west generally along the boundaries of the Proposed Project site. Any excess soil material left over after grading would be used to construct a berm wall along the perimeter of the Proposed Project site. The Proposed Project would also include grading and compacting soils at the site to provide a level site for new structures, utility systems, and pavement. These features would not substantially impede or redirect flood flows. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less-than-Significant Impact. The Proposed Project site is within FEMA Zone X, as discussed under Section 5.10(c)(iv) (FEMA, 2021), and is not within a flood hazard zone. Although no lakes or other large, enclosed water bodies are near the Proposed Project site, small seiches have occurred within the San Pedro Bay Port Complex. According to the California Department of Conservation (DOC), the Proposed Project site is located within a tsunami hazard zone (DOC, 2023d). However, the *Tsunami Hazard Assessment for the Ports of Los Angeles and Long Beach* (Moffatt & Nichol, 2007) modeled the possibility of tsunami propagation into the Ports and concluded that a tsunami caused by local seismic activity, or an underwater landslide would be unlikely to occur more than once every 10,000 years.

Although the Port has historically been subjected to seiches and tsunamis, the Proposed Project site is within the inner portion of the harbor complex, adjacent to the East Basin and Cerritos Channel, and would be protected by Terminal Island to the south. Inundation of the Proposed Project site is not anticipated, and the Proposed Project would not risk release of pollutants due to project inundation. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

e. Would the project 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 SWRCB CGP, and operations would require coverage under the IGP, proposed CII permit, and development of a new project-specific SWPPP. These regulatory requirements would minimize pollutant loading. The Proposed Project would not interfere with any water quality or groundwater management plan. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.11 LAND USE PLANNING

Discussion:

a. Would the project physically divide an established community?

No Impact. The Proposed Project site is located in an 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 existing conditions, the Proposed 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 and I-110. The Proposed Project site is located on an existing unoccupied parcel, and the Proposed Project would include construction and operation activities that would alter the primary use of the site. However, the proposed use would not physically divide an established community or disrupt existing uses in the surrounding area. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- 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?**

Potentially Significant Impact. The Proposed Project site is governed by the PMP, the City of Los Angeles Port of Los Angeles Plan, and City of Los Angeles zoning ordinances and codes. The Proposed Project parcel is zoned qualified light industrial ([Q]M2-1) and Heavy Industrial (M3) under the City of Los Angeles Zoning Ordinance and would not conflict with zoning (City of Los Angeles, 2023).

The Proposed Project site is located in the PMP's Planning Area 2, which encompasses the West Basin and Wilmington areas and includes Berths 96-204. This planning area's uses include container terminals, breakbulk, liquid and dry bulk, maritime support, institutional, recreational boating, and open space. The Proposed Project site is located within the Open Space land use designation as indicated in the PMP (LAHD, 2018). PMP Section 5.4.4 states that the Proposed Project site was planned for development as passive open space with native habitats, wetlands, turf, hardscapes, and numerous trails. Per the PMP, a Plan amendment is required if a new land use is proposed on a site that is inconsistent with its land use designation(s). The proposed new institutional use at the site would not be consistent with the existing Open Space PMP designation, and a PMP Amendment would be necessary to change the land use from Open Space to Institutional. Because the Proposed Project would not be consistent with the existing PMP designation, the Proposed Project would conflict with the PMP. Additional analysis is required to determine if the Proposed Project would cause a significant environmental impact due to this conflict with the PMP. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

5.12 MINERAL RESOURCES

Discussion:

- 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?**

Less-than-Significant Impact. According to the California Geologic Energy Management Division (CalGEM) Well Finder tool, although approximately 30 wells are located within the Proposed Project site boundaries, none are active; all wells within the Proposed Project site are either plugged (i.e., permanently nonoperational) oil and gas, plugged water source, or plugged multipurpose wells (Figure 2-3) (CalGEM, 2023). Five active oil and gas wells are located approximately 200 to 300 feet to the north and east of the Proposed Project site, and six idle (i.e., not producing oil or natural gas for a period of 24 consecutive months) oil and gas and observation wells are located more than 300 feet to the east of the Proposed Project site (CalGEM, 2023). Although the Proposed Project site is located in a Mineral Resource Zone according to the City of Los Angeles General Plan Conservation Element, the Proposed Project site is not currently being used to extract

minerals (City of Los Angeles, 2001). The Proposed Project would not conflict with existing oil extraction land uses or prevent future oil extraction as the existing wells are inactive and plugged. 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 State. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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?

Less-than-Significant Impact. As described in Section 5.12(a), the Proposed Project site is located within a Mineral Resource Zone and contains plugged oil and gas wells that are inactive and not currently used for mineral extraction. The Proposed Project would not conflict with existing oil extraction land uses or prevent future oil extraction. The Proposed Project would not 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. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

5.13 NOISE

Discussion:

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?

Potentially Significant Impact. Project construction activities are estimated to take approximately 36 months to complete. Construction activities could result in temporary increases in ambient noise levels in the Proposed Project area from use of various equipment, such as trucks, tractors, scrapers, rollers, dozers, graders, excavators, dump trucks, etc. as described in the Project Description in Section 2.3.1. Maximum noise from these types of equipment ranges from 76 A-weighted decibels (dBA) to 85 dBA at 50 feet from the source (FHWA, 2006). Although there are no residential zones on Port property, there is a possibility of liveaboard tenants on boats at the marinas to the north, south, and west of the Proposed Project site. Subject to further investigation, the nearest potential residential receptors could be approximately 170 feet to the west.³

Operations at the Workforce Training Facility would take place on Monday through Friday between 7:00 a.m. and 5:00 p.m. regularly with night shift training between 6:00 p.m. and 3:00 a.m. Night shift training would be required to be conducted after 10:00 p.m. within

³ At the time of preparation, liveaboard data was unavailable, so this NOP/IS assumed liveaboards occupied the closest boat slips to the Proposed Project.

the parameters of the City's noise ordinances. Operational activities would include employee and trainee trips to the site, involving the use of training equipment such as cranes, transtainer, top handlers, side pick, heavy lifts, forklifts, UTRs, payloaders, and winch.

Considering the relatively close proximity of potential sensitive receptors, noise levels during construction may be perceptible to these receptors. In addition, as no activities are currently being conducted at the site, operations at the Workforce Training Facility would represent an increase in the ambient noise conditions of the area. Additional analysis is required to determine whether the Proposed Project would 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. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

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

Potentially Significant Impact. Vibration-sensitive land uses include high-precision manufacturing facilities or research facilities with optical and electron microscopes. None of these are located in the Proposed Project area. Therefore, the significance threshold for "excessive ground-borne vibration" depends on whether a nuisance, annoyance, or physical damage to any buildings could result from the Proposed Project. The City of Los Angeles does not specify a significance criterion for 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, 2020). Existing buildings are located south of the site at the marinas. Due to the proximity of these buildings and the level of construction activities anticipated to be completed at the Proposed Project site, the Proposed Project could exceed Caltrans guidelines for building damage and human annoyance. Additional analysis is required to determine whether the Proposed Project could result in generation of excessive groundborne vibration or groundborne noise levels. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- 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?**

Less-than-Significant Impact. The Proposed Project site is not located within an airport land use plan. The nearest public airports are Torrance Municipal Airport – Zamperini Field, located over 5 miles to the north-northwest; and Long Beach Airport, located approximately 6 miles to the northeast. Given the distance between the Proposed Project site and the identified airports, construction workers, employees, and trainees at the Proposed Project site would not be exposed to excessive noise levels from airplanes. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

5.14 POPULATION AND HOUSING

Discussion:

- 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)?**

Less-than-Significant Impact. The Proposed Project would not include development of any new residential facilities, extension of any roads, or development of other growth-accommodating infrastructure. However, the Proposed Project would include the development of a new training facility that would require workers during construction and operation, as well as involve visits from trainees in the maritime and goods movement industries. A peak of approximately 50 workers per day would be employed for the 36-month construction period (LAHD, 2023b, 2023c). Up to 150 full-time and part-time employees would work at the site in one shift during operations; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b).

The Proposed Project site is within the Port and proximate to a well-established, heavily populated urban community that provides sufficient existing housing stock and established infrastructure. Additionally, an adequate supply of workers is assumed to be in the vicinity of the Proposed Project site given the urban setting. The proposed Workforce Training Facility would encourage the existing local workforce to utilize its training programs.

The population of the City of Los Angeles is expected to grow by approximately eight percent between 2020 and 2030, and this growth has been planned for in the General Plan Housing Element (City of Los Angeles, 2021). While the Proposed Project would address the existing labor shortage in the cargo industry by attracting new workers and providing new opportunities for up-skilling or re-skilling for existing workers, the majority of the Proposed Project's workers and trainees would likely come from the existing local workforce, and the number of those requiring relocation would be negligible compared to

the City's projected population growth. Trainees and trainers would primarily commute from the Greater Los Angeles area. The Proposed Project would not induce substantial unplanned population growth in the area either directly or indirectly. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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

No Impact. No housing is present within the boundaries of the Proposed Project site that would be displaced, and no replacement housing would be necessary. No approved residential housing is located within the Port,⁴ although liveaboard tenants may potentially be on boats at the marinas to the north, south, and west of the Proposed Project site. The Proposed Project would not displace the marina liveaboards, if any. The Proposed Project would not result in the displacement of any people or housing or necessitate the construction of replacement housing elsewhere. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.15 PUBLIC SERVICES

Discussion:

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. LAFD provides fire protection and paramedic services within the City and the Port. LAFD Station 49 (400 Yacht Street, Wilmington), which is located west of the Proposed Project site across East Basin, is the nearest fire station that would provide fire protection and paramedic services to the Proposed Project site.

Emergency access in the vicinity of the Proposed Project site would be maintained for emergency service vehicles during construction and operation activities, as construction traffic would be intermittent and temporary during construction hours, and road closures, if necessary, would also be temporary during construction activities. In addition, no new or altered fire protection services would be required during construction and operation as a result of population growth.

⁴ Residential housing is not a permitted use at the Port of Los Angeles under the state's Tidelands grants.

As discussed in Section 5.14(a), the Proposed Project would not directly or indirectly induce unplanned population growth in the City, and thus, would not necessitate new or altered fire protection facilities. Therefore, the existing LAFD Station 49 is anticipated to be able to adequately serve the Proposed Project. Although the Proposed Project could potentially result in a slight increase in demand for emergency service due to the workforce training activities at the site, this increase is expected to be limited as operational activities would comply with State and City fire codes, standards, and regulations. The Proposed Project would not affect service ratios, response times, or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

b. Police Protection?

Less-than-Significant Impact. The Los Angeles Port Police (Port Police) provides the primary law enforcement and security for the Port including 7,500 acres along 43 miles of waterfront (POLA, 2023c). The Port Police headquarters is located approximately 2.8 miles southwest of the Proposed Project site at 330 South Centre Street, Los Angeles. The Port Police Dive Unit facility boats and offices/lockers are located approximately 2.5 miles southwest of the Proposed Project site at 954 South Seaside Avenue, Los Angeles. Additionally, the Los Angeles Police Department (LAPD) provides law enforcement for 21 community areas including San Pedro (LAPD, 2023). The Proposed Project site is located within the LAPD Harbor Division Area, which covers 27.5 square miles including Harbor City, Harbor Gateway, San Pedro, Wilmington, and Terminal Island (LAPD, 2021).

Similar to fire protection services, the Proposed Project site is already within the Port Police and LAPD service areas, and once operational, would continue to be served. As discussed in Section 5.14(a), the Proposed Project would not directly or indirectly induce unplanned population growth in the City, and therefore, would not substantially increase the demand for new police protection services. The Proposed Project would not affect service ratios, response times, or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

c. Schools?

Less-than-Significant Impact. The need for new schools is generally associated with an increase in the school-aged population or a decrease in the accessibility and availability of existing schools. The additional employees hired for construction and operation of the Proposed Project would likely come from the local regional area, and any of the employees' and trainees' school-age children would likely already attend schools in the vicinity.

The majority of trainees are expected to already reside in the area; the number of new trainees moving into the area whose school-age children would attend local schools would result in a negligible increase in the school-aged population. A substantial increase in school-age children requiring public education is not expected to result from the Proposed Project.

The Proposed Project would not affect service ratios or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

d. Parks?

Less-than-Significant Impact. The Proposed Project would not include development of new parks or cause a reduction in existing park facilities. Although the PMP land use designation is Open Space, the Proposed Project site was used as industrial open space for industrial material storage and was never used as a recreational open space or park for area residents.⁵ Furthermore, the Proposed Project site would be confined to the Port and would not induce substantial population growth that would increase demand for parks. The Proposed Project would not affect service ratios or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

e. Other Public Facilities?

Less-than-Significant Impact. As previously discussed in Section 5.14(a), the Proposed Project would not include development that would induce substantial unplanned population growth causing an increase in the use of libraries, community centers, hospitals, or other public facilities. The majority of the Proposed Project's workers and trainees would likely come from the existing local workforce, and the number of those requiring relocation would be negligible compared to the City's projected population growth. A substantial increase in use of these public facilities is not anticipated as a result of the Proposed Project. The Proposed Project would not affect service ratios or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

⁵ There are no residential zones located on Port property.

5.16 RECREATION

Discussion:

- 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. An increased demand for neighborhood or regional parks and other recreational facilities is generally associated with an increase in permanent residents. As discussed in Section 5.14(a), the Proposed Project would not include the development of new residential facilities, and no substantial population growth would result from the Proposed Project activities. Therefore, no increase in the use of existing neighborhood and regional parks or other recreational facilities is anticipated, and no substantial physical deterioration of existing facilities would result from the Proposed Project. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- 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. The Proposed Project would include the construction and operation of a facility to train the workforce at the Ports of Los Angeles and Long Beach. The Project would not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.17 TRANSPORTATION

Discussion:

A project in the Port is considered to have a significant transportation/circulation impact if the project would result in one or more of the occurrences listed in Appendix A (2022 LADOT TAG Plan Consistency Worksheet). These criteria are based on the CEQA Guidelines Appendix G and the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) (LADOT, 2022), and are used as the basis for determining the impacts of the Proposed Project and alternatives under CEQA.

For the purposes of this NOP/IS, impacts of the Proposed Project were qualitatively assessed relative to potential conflicts with area plans, design features, and emergency access, and will be quantitatively assessed relative to vehicle miles traveled (VMT) as prescribed by the LADOT Transportation Assessment Guidelines, in the EIR.

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

No Impact. The TAG states that a project that “generally conforms with and does not obstruct the City’s development policies and standards will generally be considered to be consistent” and is not in conflict with applicable programs, plans, ordinances, or policies addressing the circulation system. The 2022 LADOT Transportation Assessment Guidelines include three screening criteria questions to help determine whether a project conflicts with City of Los Angeles circulation system policies.

If the answer is “no” to all of the following questions, a “no impact” determination can be made for this threshold (LADOT, 2022).

If the Proposed Project requires a discretionary action, and the answer is yes to any of the following questions, further analysis will be required to assess whether the Proposed Project would conflict with plans, programs, ordinances, or policies:

- (i) Does the project require a discretionary action that requires the decision maker to find that the decision substantially conforms to the purpose, intent and provisions of the General Plan?

The Proposed Project requires approval by the Board of Harbor Commissioners, which is a discretionary action. However, this discretionary action does not require the decision maker to amend any project component to conform to the purpose, intent, or provision of any existing general plan. Therefore, the Proposed Project would comply with all required City of Los Angeles circulation system policies and does not deviate from any general plan.

- (ii) Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?

The Proposed Project would not alter existing transportation routes or transportation options, nor would it alter public access. Direct landside access to the Proposed Project site is provided via Shore Road. The Proposed Project would not require any substantial modifications to the public right-of-way. Utility connections would require in-street construction activities; however, street closures would be temporary and would not adversely affect the circulation system.

The 2022 LADOT TAG includes a “Plan Consistency Worksheet” which provides questions that must be answered in order to help guide whether the project conflicts with City circulation policies (see Appendix A). The worksheet, along with the discussion above, demonstrate that the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, for transit, roadway, and pedestrian. However, further analysis of question a(ii) for bicycle parking will be conducted as part of the EIR.

- (iii) Is the project required to or proposing to make any voluntary modifications to the public right-of-way (i.e., dedications and/or improvements in the right-of-way, reconfigurations of curb line, etc.)?

The Proposed Project does not include any modifications to existing roadways 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 include dedications or physical modifications to the public right-of-way, nor is it required.

The Proposed Project has no impact based on the above three criteria. Therefore, no impacts would occur, and this impact will not be evaluated further in the EIR.

- b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1)?**

Potentially Significant Impact. The intent of this threshold is to assess whether the Proposed Project would cause substantial VMT.

Based on the project description, up to 150 full-time and part-time employees would work at the site in one shift during operations; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b). The Proposed Project operation would generate automobile trips that are higher than the LADOT Transportation Assessment Guidelines threshold of 250 or more daily automobile vehicle trips (LADOT 2022) during operation of the Proposed Project, and thus requires further VMT analysis. The VMT analysis would entail an evaluation of the trip generation and average trip lengths, typical for the trainers and trainees (Port labor). This issue will be further evaluated and addressed in the EIR.

- c. 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. Impacts regarding the potential increase of hazards due to a geometric design feature relate to the design of access points to and from the Proposed Project site.

The Proposed Project's construction activities would be primarily limited to the site boundaries and would not enter into the public right-of-way. Existing access to the site would be maintained by adherence to a project-specific construction traffic management plan that would be approved by LAHD. Pedestrian access, bus routes, and metered parking do not exist on the streets adjacent to the site.

The Proposed Project's access driveways are designed to safely accommodate vehicles without any impacts to the public right-of-way. Also, as previously discussed, the Proposed Project is not proposing or required to make any modifications to the public right-of-way, and therefore, a No Impact determination can be made. The adjacent public roadway access for the Proposed Project site would be via the intersection of Henry Ford Avenue/Pier A Way/SR-47 Ramps. For information purposes only, traffic operating conditions will be analyzed for this intersection to demonstrate sufficient site access in the EIR.

d. Result in inadequate emergency access?

No Impact. The Proposed Project would not alter or close existing roadways or access roads, or block emergency access points. Emergency access would be unchanged by the Proposed Project. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.18 TRIBAL CULTURAL RESOURCES

Discussion:

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), or

No Impact. On March 13, 2023, notification letters were sent to California Native American Tribes with cultural affiliations with the Proposed Project site. No requests for consultation were received from any of the notified tribes within the 30-day response time. The Proposed Project is unlikely to cause a substantial adverse change to Tribal Cultural Resources, as the Proposed Project area is underlain by a variable mix of sands, silts, and clay consistent with the estuarine deposits in the area and the hydraulic fill dredge material used to construct the nearby islands (Ninyo & Moore 2022). Due to the unlikely chance of encountering historical prehistoric age resources and because no additional resources were identified by tribes, the Proposed Project would not cause any changes in the significance of a Tribal Cultural Resource. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- (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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No Impact. As discussed in Section 5.18(a)(i), no requests for consultation were received from any of the notified tribes within the 30-day response time, and the Proposed Project site has a low likelihood of containing historical prehistoric age resources due to dredge material onsite and the previous construction disturbance. The CEQA lead agency, in its discretion, has not identified any Tribal Cultural Resources in the Proposed Project area. The Proposed Project would not cause any changes in the significance of a Tribal Cultural Resource. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.19 UTILITIES AND SERVICE SYSTEMS

Discussion:

- a. **Would the project 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, the construction or relocation of which could cause significant environmental effects?**

Less-than-Significant Impact. The Proposed Project would require installation of new utility systems to support the increased demand for electrical, sewer, water, storm drain, and telecommunication systems. These additional utility systems would connect to existing utility infrastructure within the surrounding area; therefore, any utility improvements would be limited to the Proposed Project site. Although the Proposed Project would cause increased demand for utility services, the Proposed Project would not substantially increase the area's population such that these service systems would require relocation or expansion, causing significant environmental effects. Additionally, the surrounding area is highly developed and already served by utility facilities. The existing water infrastructure would be adequate to serve the Proposed Project. In addition, the existing power supply infrastructure would be adequate to serve the proposed uses, as LADWP has an 8,019-megawatt electric capacity for the City of Los Angeles (LADWP, 2023). No additional utility infrastructure would be required outside of the Proposed Project limits to accommodate the Proposed Project's utility needs.

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 beyond the limits of the Proposed Project site causing significant environmental effects. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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. Construction of the Proposed Project would temporarily require water supplies for activities such as compaction, grading, and dust control that would be obtained from the municipal water supply. Water use during construction would be temporary, occurring mainly for earthwork improvements during Phase 1 for approximately 12 months. Water use during Phase 2 would be limited to activities such as concrete production for building foundations and pavement. Water use during operations would consist of typical municipal water use at the facility. Up to 150 full-time and part-time employees in addition to up to 300 trainees would not substantially increase demand for water compared to the overall demand within the Port. The project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, potential impacts would be a less than significant, and this issue will not be addressed further in the EIR.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less-than-Significant Impact. The Proposed Project site is serviced by the City of Los Angeles Sanitation District's (LASAN) Terminal Island Water Reclamation Plant (TIWRP). The TIWRP serves the Harbor Area (Terminal Island, San Pedro, Harbor City, and Wilmington) in the City of Los Angeles and has the capacity to treat up to 30 million gallons of municipal and industrial flows daily (LASAN, 2023a). The Proposed Project would generate domestic wastewater from restrooms and offices. A peak of approximately 50 workers per day would be employed for the 36-month construction period (LAHD, 2023b, 2023c). During operation, up to 150 full-time and part-time employees would work at the site; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b). This increase in wastewater production would not be substantial given the TIWRP's treatment capacity and the Proposed Project's compliance with the LASAN Wastewater Permit. Additionally, as previously discussed in Section 5.14(a), the Proposed Project would not directly or indirectly induce population growth in the area. Therefore, the Proposed Project would not exceed or substantially alter wastewater treatment requirements of the City's sewage collection and treatment system per the Los Angeles Municipal Code Industrial Waste Control Ordinance (LASAN, 2023b).

Although the Proposed Project would be a new use at the existing unoccupied site, the TIWRP would have adequate capacity to treat the temporary wastewater generated during construction and permanent wastewater generated during operation. The Proposed Project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the Proposed Project's projected demand in addition to existing commitments. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

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's construction activities would temporarily generate solid waste associated with grading and removal of existing debris, including contaminated soil, concrete slabs, asphalt, gravel, cobbles, boulders, piping, used tires, ceramic tiles, and a large roll-off waste bin. Construction would generate the majority of solid waste. This waste would be hauled and disposed of at a County of Los Angeles-approved waste disposal facility. Due to the hazardous nature of some of the existing soil stockpiles on site, exported stockpiles are not anticipated to be recycled and would be disposed of at a suitable hazardous waste disposal site. During operation, solid waste generated by the Proposed Project would be limited to trash from on-site employees. Up to 150 full-time and part-time employees would be employed for operation of the Proposed Project; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b). This number of employees relative to the regional context of the population of Southern California would generate limited amounts of solid waste. The Proposed Project would not generate solid waste in excess of State or local standards or impair solid waste reduction goals. Therefore, impacts would be less than significant, and this issue will not be addressed further in the EIR.

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 Resources Plan (SWIRP). The SWIRP proposes an approach for the City to achieve a goal of 90 percent solid waste diversion by 2025 (LASAN, 2023b). Compliance with the SWIRP would ensure sufficient permitted capacity to service the Proposed Project. As discussed in Section 5.19(d), solid waste associated with construction activities would be disposed of at a County of Los Angeles-approved waste disposal facility. The Proposed Project would comply with federal, state, and local statutes and regulations related to solid waste, as construction-generated waste would be disposed of at suitable facilities. 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 Assembly Bill (AB) 939, the California Solid Waste Management Act, which requires each city in the state to divert at least 50 percent of its 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. The Proposed Project would include implementation of 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, impacts would be less than significant, and this issue will not be addressed further in the EIR.

5.20 WILDFIRE

Discussion:

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 (CAL FIRE, 2023). Additionally, as discussed in Section 5.9(g), the Port and Proposed Project area are listed as "not burnable" on the US Forest Service Wildfire Hazard Potential website (USFS, 2022). The Proposed Project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

Discussion:

- 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?**

Potentially Significant Impact. As discussed in Section 5.4 (Biological Resources), three special-status species were observed, and several additional species of special status plants and animals have potential to be present within the Proposed Project site. Additional analysis is required to determine with the Proposed Project has the potential to reduce the habitat of wildlife species, cause a wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

The Proposed Project would involve ground disturbing activities. The area is developed and has been previously disturbed, and the site is underlain by artificial fill. As discussed in Section 5.5 (Cultural Resources), earthwork during Phase 1 of construction may encounter unknown buried resources. Additional analysis is required to determine whether the Proposed Project has the potential to eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- 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.)**

Potentially Significant Impact. As discussed in Section 5, Environmental Analysis, the Proposed Project would have potentially significant impacts related to Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use Planning, Noise, and Transportation. These potentially significant impacts of the Proposed Project would be potentially 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 5.3, Air Quality, and 5.8, Greenhouse Gas Emissions, the Proposed Project would have potentially significant impacts related to these issue areas. Additional analysis is required to determine whether these impacts would be cumulatively considerable. Therefore, cumulative impacts will be addressed further in the EIR.

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

Potentially Significant Impact. As discussed in Section 5.21(b), the Proposed Project may have potentially significant impacts related to Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use Planning, Noise, and Transportation. Additional analysis is required to determine whether the Proposed Project's environmental effects would cause substantial adverse effects on human beings. Therefore, these issue areas will be addressed further in the EIR.

6.0 PREPARERS AND CONTRIBUTORS

Per State CEQA Guidelines Section 15063(d)(6), this Initial Study was prepared by LAHD with assistance by Aspen Environmental Group. Members of the professional staff are listed below.

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Appendix A

2022 LADOT TAG Plan Consistency Worksheet



Attachment D: Plan, Policy, and Program Consistency Worksheet

Plans, Policies and Programs Consistency Worksheet

The worksheet provides a structured approach to evaluate the threshold T-1 question below, that asks whether a project conflicts with a program, plan, ordinance or policy addressing the circulation system. The intention of the worksheet is to streamline the project review by highlighting the most relevant plans, policies and programs when assessing potential impacts to the City's circulation system.

Threshold T-1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

This worksheet does not include an exhaustive list of City policies, and does not include community plans, specific plans, or any area-specific regulatory overlays. The Department of City Planning project planner will need to be consulted to determine if the project would obstruct the City from carrying out a policy or program in a community plan, specific plan, streetscape plan, or regulatory overlay that was adopted to support multimodal transportation options or public safety. LADOT staff should be consulted if a project would lead to a conflict with a mobility investment in the Public Right of Way (PROW) that is currently undergoing planning, design, or delivery. This worksheet must be completed for all projects that meet the Section I. Screening Criteria. For description of the relevant planning documents, **see Attachment D.1.**

For any response to the following questions that checks the box in **bold text** (i.e. **Yes** or **No**), further analysis is needed to demonstrate that the project does not conflict with a plan, policy, or program.

I. SCREENING CRITERIA FOR POLICY ANALYSIS

If the answer is 'yes' to any of the following questions, further analysis will be required:

Does the project require a discretionary action that requires the decision maker to find that the project would substantially conform to the purpose, intent and provisions of the General Plan?

Yes No

Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?

Yes No

Is the project required to or proposing to make any voluntary modifications to the public right-of-way (i.e., dedications and/or improvements in the right-of-way, reconfigurations of curb line, etc.)?

Yes No

II. PLAN CONSISTENCY ANALYSIS

A. Mobility Plan 2035 PROW Classification Standards for Dedications and Improvements

These questions address potential conflict with:



Plan, Policy, and Program Consistency Worksheet

Mobility Plan 2035 Policy 2.1 – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.

Mobility Plan 2035 Policy 2.3 – Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

Mobility Plan 2035 Policy 3.2 – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

Mobility Plan 2035 Street Designations and Standard Roadway Dimensions

A.1 Does the project include additions or new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone? Yes No

A.2 If **A.1 is yes**, is the project required to make additional dedications or improvements to the Public Right of Way as demonstrated by the street designation. Yes No N/A

A.3 If **A.2 is yes**, is the project making the dedications and improvements as necessary to meet the designated dimensions of the fronting street (Boulevard I, and II, or Avenue I, II, or III)? Yes No N/A

If the answer is to **A.1 or A.2 is NO, or to A.1, A.2 and A.3. is YES**, then the project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions.

A.4 If the answer to **A.3. is NO**, is the project applicant asking to waive from the dedication standards? Yes No N/A

Lists any streets subject to dedications or voluntary dedications and include existing roadway and sidewalk widths, required roadway and sidewalk widths, and proposed roadway and sidewalk width or waivers.

Frontage 1 Existing PROW'/Curb' : Existing _____ Required _____ Proposed _____

Frontage 2 Existing PROW'/Curb' : Existing _____ Required _____ Proposed _____

Frontage 3 Existing PROW'/Curb' : Existing _____ Required _____ Proposed _____

Frontage 4 Existing PROW'/Curb' : Existing _____ Required _____ Proposed _____

If the answer to **A.4 is NO**, the project is inconsistent with Mobility Plan 2035 street designations and must file for a waiver of street dedication and improvement.

If the answer to **A.4 is YES**, additional analysis is necessary to determine if the dedication and/or improvements are necessary to meet the City's mobility needs for the next 20 years. The following factors may contribute to determine if the dedication or improvement is necessary:

Is the project site along any of the following networks identified in the City's Mobility Plan?



- Transit Enhanced Network
- Bicycle Enhanced Network
- Bicycle Lane Network
- Pedestrian Enhanced District
- Neighborhood Enhanced Network

To see the location of the above networks, see **Transportation Assessment Support Map**.¹

Is the project within the service area of Metro Bike Share, or is there demonstrated demand for micro-mobility services?

If the project dedications and improvements asking to be waived are necessary to meet the City's mobility needs, the project may be found to conflict with a plan that is adopted to protect the environment.

B. Mobility Plan 2035 PROW Policy Alignment with Project-Initiated Changes

B.1 Project-Initiated Changes to the PROW Dimensions

These questions address potential conflict with:

Mobility Plan 2035 Policy 2.1 – *Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.*

Mobility Plan 2035 Policy 2.3 – *Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*

Mobility Plan 2035 Policy 3.2 – *People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.*

Mobility Plan 2035 Policy 2.10 – *Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.*

Mobility Plan 2035 Street Designations and Standard Roadway Dimensions

B.1 Does the project propose, above and beyond any PROW changes needed to comply with Section 12.37 of the LAMC as discussed in Section II.A, physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property?

Examples of developer-initiated physical changes to the public right-of-way include:

- widening the roadway,
- narrowing the sidewalk,
- adding space for vehicle turn outs or loading areas,
- removing bicycle lanes, bike share stations, or bicycle parking

¹ LADOT Transportation Assessment Support Map <https://arcg.is/fubbd>



Plan, Policy, and Program Consistency Worksheet

- modifying existing bus stop, transit shelter, or other street furniture
- paving, narrowing, shifting or removing an existing parkway or tree well

Yes No

B.2 Driveway Access

These questions address potential conflict with:

Mobility Plan 2035 Policy 2.10 – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.

Mobility Plan 2035 Program PL.1. Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.

Citywide Design Guidelines - Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Site Planning Best Practices:

- *Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible.*
- *Minimize both the number of driveway entrances and overall driveway widths.*
- *Do not locate drop-off/pick-up areas between principal building entrances and the adjoining sidewalks.*
- *Orient vehicular access as far from street intersections as possible.*
- *Place drive-thru elements away from intersections and avoid placing them so that they create a barrier between the sidewalk and building entrance(s).*
- *Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by separating loading areas and larger commercial vehicles from areas that are used for public parking and public entrances.*

B.2 Does the project add new driveways along a street designated as an Avenue or a Boulevard that conflict with LADOT’s Driveway Design Guidelines (See Sec. 321 in the Manual of Policies and Procedures) by any of the following:

- locating new driveways for residential properties on an Avenue or Boulevard, and access is otherwise possible using an alley or a collector/local street, or
- locating new driveways for industrial or commercial properties on an Avenue or Boulevard and access is possible along a collector/local street, or
- the total number of new driveways exceeds 1 driveway per every 200 feet² along on the Avenue or Boulevard frontage, or
- locating new driveways on an Avenue or Boulevard within 150 feet from the intersecting street, or
- locating new driveways on a collector or local street within 75 feet from the intersecting street, or

² for a project frontage that exceeds 400 feet along an Avenue or Boulevard, the incremental additional driveway above 2 is more than 1 driveway for every 400 additional feet.



Plan, Policy, and Program Consistency Worksheet

- locating new driveways near mid-block crosswalks, requiring relocation of the mid-block crosswalk

Yes No

If the answer to **B.1 and B.2 are both NO**, then the project would not conflict with a plan or policies that govern the PROW as a result of the project-initiated changes to the PROW.

Impact Analysis

If the answer to either **B.1 or B.2 are YES**, City plans and policies should be reviewed in light of the proposed physical changes to determine if the City would be obstructed from carrying out the plans and policies. The analysis should pay special consideration to substantial changes to the Public Right of Way that may either degrade existing facilities for people walking and bicycling (e.g., removing a bicycle lane), or preclude the City from completing complete street infrastructure as identified in the Mobility Plan 2035, especially if the physical changes are along streets that are on the High Injury Network (HIN). The analysis should also consider if the project is in a Transit Oriented Community (TOC) area, and would degrade or inhibit trips made by biking, walking and/ or transit ridership. The streets that need special consideration are those that are included on the following networks identified in the Mobility Plan 2035, or the HIN:

- Transit Enhanced Network
- Bicycle Enhanced Network
- Bicycle Lane Network
- Pedestrian Enhanced District
- Neighborhood Enhanced Network
- High Injury Network

To see the location of the above networks, see **Transportation Assessment Support Map**.³

Once the project is reviewed relevant to plans and policies, and existing facilities that may be impacted by the project, the analysis will need to answer the following two questions in concluding if there is an impact due to plan inconsistency.

B.2.1 Would the physical changes in the public right of way or new driveways that conflict with LADOT's Driveway Design Guidelines degrade the experience of vulnerable roadway users such as modify, remove, or otherwise negatively impact existing bicycle, transit, and/or pedestrian infrastructure?

Yes No N/A

B.2.2 Would the physical modifications or new driveways that conflict with LADOT's Driveway Design Guidelines preclude the City from advancing the safety of vulnerable roadway users?

Yes No N/A

If either of the answers to either **B.2.1 or B.2.2 are YES**, the project may conflict with the Mobility Plan 2035, and therefore conflict with a plan that is adopted to protect the

³ LADOT Transportation Assessment Support Map <https://arcg.is/fubbD>



Plan, Policy, and Program Consistency Worksheet

environment. If either of the answers to both **B.2.1. or B.2.2. are NO**, then the project would not be shown to conflict with plans or policies that govern the Public Right-of-Way.

C. Network Access

C. 1 Alley, Street and Stairway Access

These questions address potential conflict with:

Mobility Plan Policy 3.9 Increased Network Access: Discourage the vacation of public rights-of-way.

C.1.1 Does the project propose to vacate or otherwise restrict public access to a street, alley, or public stairway?

Yes No

C.1.2 If the answer to C.1.1 is Yes, will the project provide or maintain public access to people walking and biking on the street, alley or stairway?

Yes No N/A

C.2 New Cul-de-sacs

These questions address potential conflict with:

Mobility Plan 2035 Policy 3.10 Cul-de-sacs: Discourage the use of cul-de-sacs that do not provide access for active transportation options.

C.2.1 Does the project create a cul-de-sac or is the project located adjacent to an existing cul-de-sac?

Yes No

C.2.2 If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network?

Yes No N/A

If the answers to either C.1.2 or C.2.2 are YES, then the project would not conflict with a plan or policies that ensures access for all modes of travel. If the answer to either **C.1.2 or C.2.2 are NO**, the project may conflict with a plan or policies that governs multimodal access to a property. Further analysis must assess to the degree that pedestrians and bicyclists have sufficient public access to the transportation network.

D. Parking Supply and Transportation Demand Management

These questions address potential conflict with:

Mobility Plan 2035 Policy 3.8 – Bicycle Parking, Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.

Mobility Plan 2035 Policy 4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.



Plan, Policy, and Program Consistency Worksheet

Mobility Plan 2035 Policy 4.13 – Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.

D.1 Would the project propose a supply of onsite parking that exceeds the baseline amount⁴ as required in the Los Angeles Municipal Code or a Specific plan, whichever requirement prevails?

Yes No

D.2 If the answer to D.1. is YES, would the project propose to actively manage the demand of parking by independently pricing the supply to all users (e.g. parking cash-out), or for residential properties, unbundle the supply from the lease or sale of residential units?

Yes No N/A

If the answer to **D.2. is NO** the project may conflict with parking management policies. Further analysis is needed to demonstrate how the supply of parking above city requirements will not result in additional (induced) drive-alone trips as compared to an alternative that provided no more parking than the baseline required by the LAMC or Specific Plan. If there is potential for the supply of parking to result in induced demand for drive-alone trips, the project should further explore transportation demand management (TDM) measures to further off-set the induced demands of driving and vehicle miles travelled (VMT) that may result from higher amounts of on-site parking. The TDM measures should specifically focus on strategies that encourage dynamic and context-sensitive pricing solutions and ensure the parking is efficiently allocated, such as providing real time information. Research has demonstrated that charging a user cost for parking or providing a ‘cash-out’ option in return for not using it is the most effective strategy to reduce the instances of drive-alone trips and increase non-auto mode share to further reduce VMT. To ensure the parking is efficiently managed and reduce the need to build parking for future uses, further strategies should include sharing parking with other properties and/or the general public.

D.3. Would the project provide the minimum on and off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC?

Yes No

D.4. Does the Project include more than 25,000 square feet of gross floor area construction of new non-residential gross floor?

Yes No

D.5 If the answer to D.4. is YES, does the project comply with the City’s TDM Ordinance in Section 12.26 J of the LAMC?

Yes No N/A

If the answer to **D.3. or D.5. is NO** the project conflicts with LAMC code requirements of bicycle parking and TDM measures. If the project includes uses that require bicycle parking (Section 12.21 A.16) or TDM (Section 12.26 J), and the project does not comply with those Sections of the LAMC, further analysis is required to ensure that the project supports the intent of the two LAMC sections. To meet the intent of

⁴ The baseline parking is defined here as the default parking requirements in section 12.21 A.4 of the Los Angeles Municipal Code or any applicable Specific Plan, whichever prevails, for each applicable use not taking into consideration other parking incentives to reduce the amount of required parking.



Plan, Policy, and Program Consistency Worksheet

bicycle parking requirements, the analysis should identify how the project commits to providing safe access to those traveling by bicycle and accommodates storing their bicycle in locations that demonstrates priority over vehicle access.

Similarly, to meet the intent of the TDM requirements of Section 12.26 J of the LAMC, the analysis should identify how the project commits to providing effective strategies in either physical facilities or programs that encourage non-drive alone trips to and from the project site and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks).

E. Consistency with Regional Plans

This section addresses potential inconsistencies with greenhouse gas (GHG) reduction targets forecasted in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS).

E.1 Does the Project or Plan apply one the City's efficiency-based impact thresholds (i.e. VMT per capita, VMT per employee, or VMT per service population) as discussed in **Section 2.2.3** of the TAG?

Yes No

E.2 If the Answer to **E.1 is YES**, does the Project or Plan result in a significant VMT impact?

Yes No N/A

E.3 If the Answer to **E.1 is NO**, does the Project result in a net increase in VMT?

Yes No N/A

If the Answer to **E.2 or E.3 is NO**, then the Project or Plan is shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS.

E.4 If the Answer to **E.2 or E.3 is YES**, then further evaluation would be necessary to determine whether such a project or land use plan would be shown to be consistent with VMT and GHG reduction goals of the SCAG RTP/SCS. For the purpose of making a finding that a project is consistent with the GHG reduction targets forecasted in the SCAG RTP/SCS, the project analyst should consult **Section 2.2.4** of the Transportation Assessment Guidelines (TAG). **Section 2.2.4** provides the methodology for evaluating a land use project's cumulative impacts to VMT, and the appropriate reliance on SCAG's most recently adopted RTP/SCS in reaching that conclusion.

The analysis methods therein can further support findings that the project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board, pursuant to Section 65080(b)(2)(H) of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.



Plan, Policy, and Program Consistency Worksheet

References

BOE [Street Standard Dimensions S-470-1](#)

http://eng2.lacity.org/techdocs/stdplans/s-400/S-470-1_20151021_150849.pdf

LADCP [Citywide Design Guidelines](#).

https://planning.lacity.org/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide_Design_Guidelines.pdf

LADOT Transportation Assessment Support Map <https://arcg.is/fubbd>

Mobility Plan 2035

https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

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