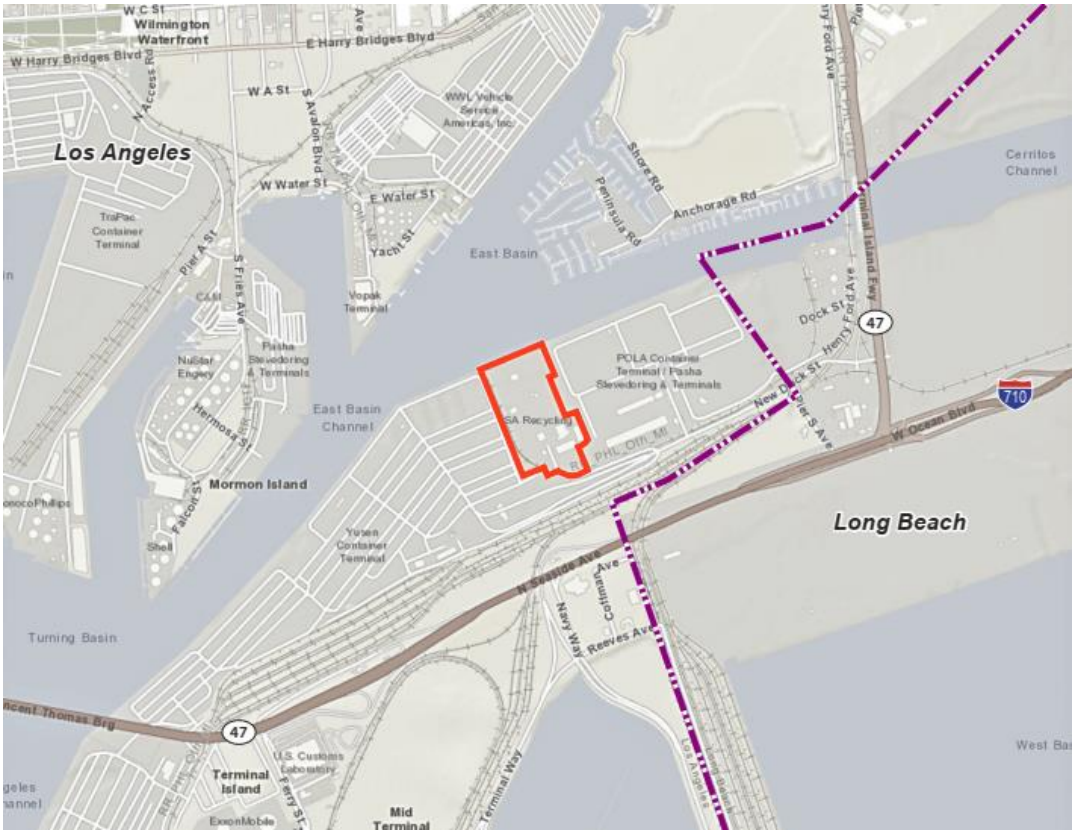
SA RECYCLING AMENDMENT TO PERMIT No. 750 PROJECT

Draft Subsequent Environmental Impact Report

APP#190916-128
SCH#93071074



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Executive Summary

ES.1 Introduction and Background

The Los Angeles Harbor Department (LAHD) operates the Port of Los Angeles (Port or POLA) under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Section 601; California Tidelands Trust Act of 1911) and the California Coastal Act (PRC Division 20 Section 30700 et seq.). The LAHD is chartered to develop and operate the Port to benefit maritime uses, and it functions as a landlord by leasing Port properties to more than 300 tenants.

ES.1.1 BACKGROUND TO THE SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

The full background of the Proposed Project is described in detail in Section 2.2.1 of this Draft SEIR. In summary, SA Recycling (Applicant) is one of LAHD's tenants that leases approximately 26.7 acres of waterfront and backland property at Berths 210 and 211 on Terminal Island at POLA to operate a scrap-metal recycling facility. The facility has operated on the site since August 7, 2010, when they obtained assignment of Permit No. 750 under Order #69250.

In 1996, LAHD certified a Final Environmental Impact Report (EIR) for the Hugo Neu-Proler Lease Renewal Project (SCH No. 93071074) (1996 Certified EIR). The primary objective of the 1996 Certified EIR was a permit renewal extending Permit No. 750 through 2024. In addition to the renewal of the permit and continuation of current operations, project objectives included remediation of soil and groundwater contamination of the project site, upgrade or replacement of on-site facilities and equipment, and addition of new facilities and equipment to the operation. The project approved in the 1996 Certified EIR (Approved Project) included remediating soil and groundwater contamination on site; reducing the opportunities for future contamination; improving aesthetics of the site; controlling noise; reducing dust emissions, managing stormwater runoff; and improving efficiency, capacity, reliability, and general environmental compatibility of the operation. The projected throughput of the site under the 1996 Approved Project was 1,300,000 gross tons of scrap metal per year. Construction of the Approved Project was completed in 1997.

In 2019, the Applicant submitted an application to LAHD (APP#190916-128) expressing interest in extending Permit No. 750 beyond its current termination date of 2024. In 2021, SA Recycling prepared an Addendum to the 1996 Certified EIR to assess the extension to the Permit. The Addendum was released for public review from August 12, 2021 to October 12, 2021, and comments were received from regulatory agencies and community stakeholders requesting LAHD to evaluate the permit extension through a more robust analysis, such as an EIR. After considering the comments and evidence received in support of those comments, LAHD decided not to adopt the Addendum and decided to conduct further environmental analysis as part of a subsequent EIR (SEIR) for the SA Recycling Amendment to Permit No. 750 Project (Proposed Project).

This SEIR analyzes the impacts of the amendment to the permit to allow for a 15-year period extension, including 10 years of continued operations (Phase 1) and an additional 5 years for non-operational restoration of the site (Phase 2) (as described in Chapter 2, Project Description). This SEIR analyzes the impacts of these components, in light of conclusions of the certified 1996 EIR as a comparison against which the Proposed Project is evaluated pursuant to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162. A full description of the guidelines for preparing an SEIR is presented in Section 1.5 of Chapter 1, Introduction, and a full description of the CEQA baseline is presented in Section ES.1.2, Scope of the Draft SEIR, and Section 2.4.7, CEQA Baseline, of Chapter 2, Project Description.

ES.1.2 SCOPE OF THE DRAFT SEIR

As the California Environmental Quality Act (CEQA) lead agency, LAHD is responsible for determining the scope and content of the Draft SEIR, a process referred to as scoping. As part of the scoping process, LAHD considered the environmental resources present within its jurisdiction and the surrounding area and identified the probable environmental effects of the Proposed Project by preparing an Initial Study Environmental Checklist and a Notice of Preparation (IS/NOP). The IS/NOP evaluated amending Permit No. 750 to extend operations beyond 2024 to allow another 10 years of operations. The IS explained the basis for scoping out the environmental resources that would warrant additional consideration in the Draft SEIR and the provided the basis for the environmental resources that were excluded from further environmental consideration.

On March 30, 2023, the LAHD issued the (IS/NOP) to inform responsible and trustee agencies, public agencies, and the public that the LAHD was preparing a Draft SEIR to subsequently update the 1996 Certified EIR. The IS/NOP was circulated for a 30-day public review and comment period starting on March 30, 2023 and ending on April 28, 2023, and a virtual scoping meeting was held on April 11, 2023. Comments received in response to the IS/NOP and during the public scoping meeting were used to inform the scope of this Draft SEIR. Based on LAHD's preliminary evaluation of the probable effects of the Proposed Project and a thorough review of the comments on the IS/NOP, the Draft SEIR analyzes effects associated with the following resources:

- Air Quality and Meteorology
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards
- Hydrology and Water Quality

Consistent with the findings of the 1996 Certified EIR, it was determined during preparation of the IS/NOP (Appendix A) that the Proposed Project would have either a less-than-significant impact or no impact associated with the following resources: Aesthetics, Agriculture and Forestry Resources, Biological Resources, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems and Wildfire.

CEQA Baseline

The 1996 Certified EIR allowed for a maximum gross annual throughput of 1.3 million gross tons of recycled scrap-metal. As described more fully in Section ES.2.3, Project Description, below and in Chapter 2, Project Description, of this SEIR, the SEIR employs a more conservative baseline assumption that the conditions that occurred on the Project site from July 1, 2021 through June 30, 2022 (FY 21/22) level (approximately 1.2 million gross tons) would be maintained during the 10-year extension of the existing operations (to 2034). Thus, operations under the Proposed Project are anticipated to continue to be at the baseline Fiscal Year 2021/2022 level.

Project Description

Section ES.2.3 below and Chapter 2 of this Draft SEIR, describes in detail activities associated with the Proposed Project. In summary, the primary object of the Proposed Project is to amend the existing Permit No. 750 to allow for an up-to 10-year extension of the current permit, which currently expires in 2024. The term extension would allow for continued operation of the site as a scrap metal recycling facility with no changes to the scope of the Permit, use of the Proposed Project site, or new construction or operations, other than routine maintenance or replacement of equipment (Phase 1, Continued

Operations). Phase 1 operations at the site would conclude at the end of year 10 (2024–2034). Up to an additional 5 years (2034–2039) will then be granted to allow for any required removal of equipment, demolition of the existing landside structures on the Project site, any necessary remediation of the Project site to the satisfy LAHD and regulatory requirements, and post remedial activities to restore the premises per the terms of the Permit (Phase 2, Non-operational Restoration Period). No recycling operations outside of those required for restoration of the site will occur during the 5-year Phase 2 term.

ES.1.3 PURPOSE OF THE DRAFT SEIR

The purpose of an SEIR is to provide the additional information necessary to make the previously certified EIR adequate for the project as updated. Accordingly, a SEIR need only contain the information necessary to respond to the changed circumstances, or new information that triggered the need for additional subsequent environmental review (CEQA Guidelines, Section 15163). An SEIR does not "re-open" a previously certified EIR or reanalyze the environmental impacts of a project as a whole; the analysis is limited to whether the project changes result in new or substantially more severe significant impacts than what was previously analyzed in the 1996 Certified SEIR.

This Draft SEIR evaluates the impacts of an Amendment to Permit 750 that allows for the Phase 1 and Phase 2 activities as described above. This Draft SEIR has been prepared in accordance with the requirements of the CEQA (California Public Resources Code [PRC] Section 21000 et seq.) and the Guidelines for Implementation of the California Environmental Quality Act of 1970 (CEQA Guidelines) (14 California Code of Regulations [CCR] Section 15000 et seq.).

This Executive Summary has been prepared in accordance with Section 15123 (b) of the CEQA Guidelines, which states that the EIR should contain a brief summary of the proposed actions and its consequences and should identify: (1) each significant effect with proposed mitigation measures that would reduce or avoid that effect; (2) areas of controversy known to the lead agency; and (3) issues to be resolved including whether or how to mitigate significant effects. This Draft SEIR describes the affected resources and evaluates the potential impacts to those resources as a result of operating the Proposed Project. Throughout, this Executive Summary contains references to various chapters and sections in the Draft SEIR where detailed information and analyses can be reviewed

ES.1.4 USES AND SCOPE OF THE SEIR

In accordance with CEQA Guidelines Sections 15088.5(d) and 15088.5(f), the LAHD is distributing a public Notice of Availability of the Draft SEIR to agencies, organizations, and interested groups and persons as well as to every agency, person, or organization that commented on the 2021 Addendum and the March 2023 IS/NOP.

This Draft SEIR will be used to inform decision-makers and the public about any new significant environmental impacts or substantially more severe environmental effects caused by the implementation of the Proposed Project. Section 1.4 describes the agencies that are expected to use this document, including the lead, responsible, and trustee agencies under CEQA. Reviewers are advised that new comments must be submitted on the Draft SEIR, and that although comments received on the 2021 Addendum form a part of the administrative record, they may no longer be considered pertinent and as such, would not require a written response by the LAHD in the Final SEIR. The certification by LAHD of the Final SEIR, Notice of Determination, and Findings of Fact will document the decision of the LAHD as to the adequacy of the Draft SEIR and will inform subsequent decisions by the LAHD whether to approve and implement the Proposed Project.

Section 1.6 describes the scope and content of the Draft SEIR. The scope is based upon the identified environmental issues involved in the Proposed Project as determined in the IS/NOP. Accordingly, and pursuant to CEQA Guidelines, Section 15163, the SEIR considers only Air Quality and Meteorology, Cultural Resources, Greenhouse Gas Emissions, Hazards, and Hydrology and Water Quality. Chapter 4,Cumulative Analysis, discusses the cumulative impacts of the Proposed Project

The SEIR does not include an analysis of alternatives because the 1996 EIR analyzed a reasonable range of alternatives and because the extension of operations and restoration of the site in the Proposed Project does not concern or alter any analysis of or conclusions reached regarding alternatives analyzed in the 1996 Certified EIR.

ES.1.5 PURPOSE AND NEED

The Proposed Project seeks an amendment to Permit No. 750 to allow for an up to 10-year extension of existing operations, with up to 5 additional years for use of the site as a non-operational restoration period for any necessary closure and remediation activities to restore the property. The extension is for continued operation of the site as a scrap metal recycling facility with no changes to the scope of the permit or use of the Proposed Project site. No new construction or operations are proposed during Phase 1 – Continued Operations, other than routine maintenance or replacement of equipment. An additional 5-year extension would be provided during the Phase 2 – Non-operational Restoration period to allow for closure, remediation and restoration of the property.

ES.1.6 PROJECT OBJECTIVES

The Proposed Project would address the Project objectives, as summarized below:

- Extending the Applicant's existing Permit a period of up to 10 years for continued operation and up to an additional 5 years to close, remediate and restore the property.
- Maintain the use of an existing permitted metal recycling facility for 10 years to provide long-term scrap metal reclamation and recycling capacity consistent with applicable local and state regulatory requirements.
- Utilize an existing permitted metal recycling site to continue providing economical, efficient and safe metal recycling and bulk export by vessel in the Southern California region to meet current and future anticipated demands.
- Allow for ongoing metal recycling activities while ensuring the protection of health, safety and the environment.
- Ensure restoration of the Project site consistent with foreseeable future requirements, including by removing the structures and installations from the SA Recycling premises in accordance site closure and remediation work plans, as required by the LAHD and trustee/responsible agencies.
- Prevent the release or threatened release of hazardous substances from uses on the Project site.

ES.2 Proposed Project

ES.2.1 PROJECT LOCATION AND SETTING

The Proposed Project is within POLA, which is in the San Pedro Bay in the City of Los Angeles in Los Angeles County, approximately 20 miles south of downtown Los Angeles. The Port is on the southern side of the city of Los Angeles and adjacent to the communities of San Pedro to the west, Wilmington to the north, the Port of Long Beach to the east, and the Pacific Ocean to the south. In total, the Port encompasses approximately 7,300 acres of land and water along 43 miles of waterfront.

ES.2.2 SURROUNDING AND NEARBY LAND USE

The Proposed Project site is located at Berths 210 and 211 at the POLA at 901 New Dock Street on Terminal Island. The site is bounded by a channel within POLA to the north, shipping container terminals to the east and west, and New Dock Street and railroad right-of-way to the south (see Figure ES-1, Regional Location).

The Proposed Project site is approximately 0.25 miles north of State Route 47 (Seaside Freeway), about 2 miles east of Interstate 110, and approximately 1.3 miles west of Interstate 710 (segment on Terminal Island) (see Figure ES-2, Local Vicinity). Vehicle access to the Proposed Project site is provided from New Dock Street and Pier S Avenue. Regional vehicular access is provided from State Route 47, Interstate 710, Interstate 110, and State Route 103. Marine vessels access the Proposed Project site via channels in POLA. A railway along New Dock Street provides rail access to the Proposed Project site.

ES.2.3 PROJECT DESCRIPTION

The Proposed Project elements are detailed in detail in Section 2.5.1, Project Components. Project activities would be broken down into two phases as follows: (1) Continued Operation for up to 10 years, and (2) Non-operational Restoration Period for up to 5 years.

Phase 1 – Continued Operation

The Proposed Project seeks an amendment to Permit No. 750 to allow for an up to 10-year extension to the Permit No. 750, which currently expires in 2024. The term extension will allow continued operation of the site as a scrap metal recycling facility with no changes to the scope of the Permit, use of the Proposed Project site, or new construction or operations, other than routine maintenance or replacement of equipment. Operations at the site would conclude at the end of year 10.

The Approved Project analyzed in the 1996 Certified EIR assumed up to 1.3 million gross tons of throughput, 300 transactions (or deliveries) per day and 164 employees. Operations in FY 21/22 were approximately 1.2 million gross tons of throughput, 280 transactions (or deliveries) per day and 140 employees. The site would be open to receive material Monday through Friday from 6:00 a.m. to 6:00 p.m. and on Saturday from 6:00 a.m. to 3:00 p.m., as discussed in Table 2-2 of Chapter 2, Project Description. Operations may occur 24 hours a day during operational days. No operational changes or increases from FY 21/22 levels are proposed for the 10 years of continued operation.

Phase 2 – Non-operational Restoration Period

During Phase 2, up to an additional 5 years will be granted to allow for any required removal of equipment, demolition of the existing landside structures on the Project site, any necessary remediation of the Project site to the satisfy LAHD and regulatory requirements, and post remedial activities to restore the premises per the terms of the Permit. No recycling operations outside of those required for restoration of the site will occur during this up to 5-year term.

The following wind down activities, which are described in detail in Section 2.5.1 of this Draft SEIR, would occur during the Non-operational Restoration Period:

- Truck Scales Closure
- Demolition/Dismantling of Structures/Buildings
- Shipping (Bulk Sale)
- Concrete Demolition – Flat Slab Concrete
- Concreate Demolition – Foundations

- Soil Removal
- Soil Import and Regrading
- Haul Residual Crushed Concrete
- Haul Suitable Cover

ES.3 Environmental Impacts

Based on the IS/NOP (Appendix A of this SEIR), the following issues were determined to be potentially significant and are therefore evaluated in this Draft SEIR:

- Air Quality and Meteorology
- Greenhouse Gas Emissions
- Hazards
- Hydrology and Water Quality

Chapter 3, Environmental Analysis, of this Draft SEIR evaluates those 4 issues. In addition, after circulation of the IS/NOP, LAHD re-evaluated the scope of the Project Description to include Phase 2 Non-Operational Restoration, which required demolition of the existing landside structures on the Project site, any necessary remediation of the Project site to the satisfy LAHD and regulatory requirements, and post remedial activities to restore the premises per the terms of the Permit. In light of this new Project phase, LAHD determined that Cultural Resources should also be carried forth for additional analysis in this SEIR.

The criteria for determining the significance of environmental impacts are described for each resource topic in Chapter 3. Mitigation measures to reduce impacts to less than significant are proposed whenever feasible. Chapter 4, Cumulative Analysis, discusses the cumulative impacts of the Proposed Project and Chapter 5 summarizes the Proposed Project's significant, irreversible commitments of resources. Summary descriptions of the impacts, mitigation measures, and residual impacts for the Proposed Project are provided in Table ES-1.

FIGURE ES-1

Regional Location

SA Recycling Amendment to Permit No. 750 Project Draft Subsequent EIR

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FIGURE ES-2

Local Vicinity

SA Recycling Amendment to Permit No. 750 Project Draft Subsequent EIR

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ES.3.1 IMPACTS NOT CONSIDERED IN THE SEIR

The scope of this Draft SEIR was established on the IS/NOP issued by LAHD on March 30, 2023 (Appendix A of this Draft SEIR), and on the comments received by agencies and the public. The IS/NOP concluded that certain topics would be excluded from the SEIR because (a) the 1996 EIR concluded that there were no significant impacts associated with those topics, or (b) the mitigation measures proposed in the 1996 EIR have been implemented and/or completed, and/or (c) the level of significance is unchanged from that described in the 1996 EIR and any modification to the mitigation measures is not expected to affect that finding.

Accordingly, the SEIR does not re-analyze Aesthetics, Agriculture and Forestry Resources, Biological Resources, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems and Wildfire, consistent with CEQA Guidelines Section 15163.

ES.3.2 IMPACTS OF THE PROPOSED PROJECT

Impacts and mitigation measures are describe in Table ES-1.

ES.3.2.1 Unavoidable Significant Impacts

This Draft EIR has determined that implementation of the Proposed Project would not result in any new significant and unavoidable impacts.

ES.3.2.2 Summary of New Significant Impacts that Can Be Mitigated, Avoided, or Substantially Lessened

This Draft SEIR has determined that implementation of the Proposed Project would result in significant impacts that can be mitigated related to:

- Hazards: Ongoing use without appropriate maintenance of the existing cap over the proposed 10-year Phase 1 Continued Operations period could result in future degradation of the existing cap and releases of contaminated soils prior to remediation, which could create a new significant hazard to the public or environment and mitigation is required. Implementation of MM-HAZ-1: Maintenance of Existing Cap would reduce a significant impact to less than significant.
- Hazards: The Phase 2 Non-operational Restoration activities of the Proposed Project would include demolition of all site structures. Based on the age of the structures, asbestos, lead-based paint, and other hazardous building materials could be present. Demolition of these structures without proper abatement would potentially result in a release of hazardous materials during routine demolition operations, creating a new significant impact to the public and on-site workers and mitigation was required. Implementation of MM-HAZ-2: Pre-Demolition Hazardous Materials Survey and Abatement would reduce a significant impact to less than significant.

ES.3.2.3 Summary of Less-than-Significant Impacts

This Draft SEIR has determined that implementation of the Proposed Project would result in no new or substantially more severe significant impact without mitigation related to the issues of:

- Air Quality: Emissions that exceed an SCAQMD threshold of significance in Table 3.1-5; new ambient air pollutant concentrations that exceed NAAQS or CAAQS or exceed an SCAQMD LST

emissions threshold; other emissions (such as those leading to odors) that adversely affect a substantial number of people; exposure of receptors to significant levels of TACs per SCAQMD thresholds; conflict with or obstruct implementation of an applicable air quality plan.

- **Cultural Resources:** Impacts on built environment historic resources; substantial adverse change in the significance of an archeological or ethnographic resources; directly or indirectly destroy a unique paleontological resource or unique geological features; disturb any human remains, including those interred outside of formal cemeteries.
- **Greenhouse Gas Emissions:** Generate GHG emissions, either directly or indirectly that would exceed the SCAQMD 10,000 metric tons per year (mty) CO2e threshold; conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions.
- **Hazards:** Located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.
- **Hydrology and Water Quality:** Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality; Risk release of pollutants due to inundation as a result of a flood, tsunami, or seiche hazard.

Table ES-1. Summary of Impacts and Mitigation for the Proposed Project

Environmental Impacts	Impact Determination	Applied Mitigation Measures or Standard Conditions	Impacts After Mitigation
3.1 Air Quality			
Impact AQ-1: Would the Proposed Project result in emissions that exceed an SCAQMD threshold of significance in Table 3.1-5?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact AQ-2: Would the Proposed Project result in new ambient air pollutant concentrations that exceed NAAQS or CAAQS or exceed an SCAQMD LST emissions threshold in Table 3.1-6?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact AQ-3: Would the Proposed Project result in other emissions (such as those leading to odors) that adversely affect a substantial number of people?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact AQ-4: Would the Proposed Project expose receptors to significant levels of TACs per SCAQMD thresholds?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact AQ-5: Would the Proposed Project conflict with or obstruct implementation of an applicable air quality plan?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur

Table ES-1. Summary of Impacts and Mitigation for the Proposed Project

Environmental Impacts	Impact Determination	Applied Mitigation Measures or Standard Conditions	Impacts After Mitigation
3.2 Cultural Resources			
Impact CR-1: Would the Proposed Project have a significant impact on built environment historic resources?	No new or substantially more significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact CR-2: Would the Proposed Project cause a substantial adverse change in the significance of an archeological or ethnographic resources?	No new or substantially more significant impacts would occur	No mitigation is required; however, SC CR-1: Stop Work in the Area if Archeological Resources are Encountered would be implemented	No new or substantially more severe significant impacts would occur
Impact CR-3: Would the Project directly or indirectly destroy a unique paleontological resource or unique geological features?	No new or substantially more significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact CR-4: Would the Proposed Project disturb any human remains, including those interred outside of formal cemeteries?	No new or substantially more significant impacts would occur	No mitigation is required; however, SC CR-2: Stop Work in the Area if Human Remains are Encountered would be implemented	No new or substantially more severe significant impacts would occur
3.3 Greenhouse Gas Emission			
Impact GHG-1: Would the Proposed Project generate GHG emissions, either directly or indirectly that would exceed the SCAQMD 10,000 mty CO2e threshold?	No new significant impact would occur	No mitigation is required.	No new significant impact would occur
Impact GHG-2: Would the Proposed Project conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions?	No new significant impact would occur	No mitigation is required.	No new significant impact would occur
3.4 Hazards			
Impact HAZ-1: Would the Proposed Project create a significant hazard through the routine transport, use or disposal of hazardous materials?	New Significant Impacts would occur	**MM-HAZ-1** Maintenance of Existing Cap and **MM-HAZ-2** Pre-Demolition Hazardous Materials Survey and Abatement	Less than significant impacts would occur with the implementation of new mitigation measures
Impact HAZ-2: Would the Proposed Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving	New Significant Impacts would occur	**MM-HAZ-1** Maintenance of Existing Cap and **MM-HAZ-2** Pre-Demolition Hazardous Materials Survey and Abatement	Less than significant impacts would occur with the implementation of new mitigation measures

Table ES-1. Summary of Impacts and Mitigation for the Proposed Project

Environmental Impacts	Impact Determination	Applied Mitigation Measures or Standard Conditions	Impacts After Mitigation
the release of hazardous materials into the environment?			
Impact HAZ-3: Is the Proposed Project located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
3.5 Hydrology and Water Quality			
Impact HYD-1: Would the proposed project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact HYD-2: Would the Proposed Project risk release of pollutants due to inundation as a result of a flood, tsunami, or seiche hazard?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur

ES.3.2.4 Mitigation Measures

The following mitigation measures would be required by LAHD for the Proposed Project:

Hazards:

MM-HAZ-1: Maintenance of the Existing Cap. The existing cap shall, at all times during the continued operations of the Proposed Project, prior to the deconstruction activities, meet the requirements of A.6 of the WDR, which includes a minimum of 6 inches of concrete pavement over a minimum of 8 inches of base rock or base material. A maintenance schedule shall be prepared and implemented that addresses ongoing maintenance and repair of the concrete cap. The schedule shall be reviewed and approved by LAHD. Inspections will be conducted by the site operator; inspection reports will be submitted to LAHD for review prior to finalization and/or submittal to any regulatory agency. Additionally, LAHD shall have authority to conduct regular cap inspections as outlined in the maintenance schedule to verify cap integrity and confirm the maintenance and repair schedule is being appropriately implemented. In addition to LAHD oversight, a workplan must be submitted to and approved by DTSC if corrective actions associated with the Consent Order require removal of pavements overlying contaminated soils.

MM-HAZ-2: Pre-Demolition Hazardous Materials Survey and Abatement. A hazardous materials survey will be conducted on the Project site prior to demolition or other deconstruction activities. Demolition or renovation plans and contract specifications shall incorporate abatement procedures for the removal of materials containing hazardous materials, as defined at the time of the activity. All abatement work shall be done in accordance with federal, state, and local regulations and requirements, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District.

ES.3.2.5 Standard Conditions of Approval

The following Standard Conditions of Approval would be required by LAHD for the Proposed Project:

Cultural Resources

SC CR-1: Stop Work in the Area if Archaeological Resources Are Encountered. In the unlikely event that any prehistoric artifact of historic period materials or bone, shell or nonnative stone is encountered during restoration 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.

SC CR-2: Stop Work in the Area if Human Remains are Encountered. In the unlikely event that any human remains are encountered during restoration activities, excavation shall be immediately stopped, the area shall be secured, and no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted in order to determine proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further excavation activity until consultation with the MLD regarding their recommendations as required by California Public Resources Code Section 5097.98 has been conducted. In addition, California Public Resources Code Section 5097.98, CEQA Guidelines Section 15064.5 and California Health and Safety Code Section 7050.5 shall be followed in the event that human remains are discovered.

ES.3.2.6 Cumulative Impacts

This Draft SEIR defines cumulative impacts as the changes in the environment resulting from the incremental impact of the Proposed Project when added to other closely related recent, current, and reasonably foreseeable future projects. This definition is consistent with State CEQA Guidelines Section 15355(b). Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

There are 42 related projects in the general area of SA Recycling facility that could contribute to impacts that could be cumulatively significant. The Proposed Project was analyzed in conjunction with those related projects for its potential to contribute to significant cumulative impacts.

Cumulative impact evaluations for each resource are included in Chapter 4 of this Draft SEIR.

The Proposed Project would not contribute to cumulatively considerable impacts under CEQA for the following resource areas:

- Air quality and Meteorology
- Cultural resources
- Greenhouse gas emissions
- Hazards
- Hydrology and water quality.

ES.3.2.7 Significant Irreversible Changes to the Environment

Resources that are committed irreversibly and irretrievably are those that would be used by a project on a long-term or permanent basis. Fossil fuels and other forms of energy would be consumed during the Phase 1 (Continued Operation) of the Proposed Project. Ocean-going vessel fuels, diesel, and gasoline would continue to be used for ships, tugboats, facility operations, and on-road vehicles (trucks and employee automobiles). Electrical energy and natural gas would be consumed during operation.

Non-recoverable materials and energy would be used during the Phase 1 (Continued Operation) and Phase 2 (Nonoperational Restoration Period) activities, but the amounts needed would be accommodated by existing supplies. Although the amounts of materials and energy used would be limited, they would nevertheless be unavailable for other uses. The minimal irreversible changes associated with the Proposed Project likely would be justified by the recycling activity, which the Proposed Project would provide. The irreversible changes associated with the Proposed Project are considered justified under CEQA.

ES.4 Public Comment Issues Raised

During the NOP scoping process, individuals and organizations provided comments on the scope and content of the Draft SEIR. The NOP scoping period lasted from March 30, 2023 until April 28, 2023, and included one scoping meeting on August 11, 2023. Table 1-3 in Chapter 1 summarizes the relevant comments on the IS/NOP and indicate where a particular comment would be addressed in the Draft SEIR. Key comments urged the LAHD to address issues related to Cultural Resources, Air Quality Emissions, Odors, Hazards and Hydrology and Water Quality.

ES.5 Issues to be Resolved

Section 15123(b)(3) of the state CEQA Guidelines requires that an EIR contain issues to be resolved; this includes whether or how to mitigate significant impacts. This section lists the major issues to be resolved regarding the Proposed Project. The major issues to be resolved include decisions by the lead agency as to whether:

- This Draft SEIR adequately describes the new significant or substantially more severe environmental impacts of the Proposed Project,
- The recommended mitigation and standard conditions of approval should be adopted or modified,
- Additional mitigation measures need to be applied to the Proposed Project, or
- The Proposed Project should or should not be approved for implementation.

Chapter 1

Introduction

1.1 Introduction

The Los Angeles Harbor Department (LAHD) is considering an application by SA Recycling LLC (SA Recycling or Applicant) for the proposed SA Recycling Amendment to Permit No. 750 Project (Proposed Project). The Proposed Project would amend Permit No. 750 to allow a 15-year extension, including 10 years (2024–2034) of continued operations without any changes in the existing use or scope of operations approved under the existing permit and 5 years (2034–2039) for the demolition and excavation of the Project site to return it to a clean, vacant site.

Chapter 3, Environmental Analysis, of this Draft Subsequent Environmental Impact Report (SEIR) describes the affected environmental resources and evaluates the potential impacts on those resources that are likely to occur as a result of the Proposed Project. The Draft SEIR will be used to inform decision makers and the public about the environmental effects of the Proposed Project.

1.2 Background

1.2.1 PROJECT LOCATION

The Proposed Project is within Port of Los Angeles (POLA or Port), which is in the San Pedro Bay in the city of Los Angeles in Los Angeles County, approximately 20 miles south of downtown Los Angeles. The LAHD administers the Port under the California Tidelands Trust Act of 1911 and the Los Angeles City Charter. The LAHD develops and leases Port property to tenants who operate the facilities. The Port is on the southern side of the city of Los Angeles and adjacent to the communities of San Pedro to the west, Wilmington to the north, the Port of Long Beach to the east, and the Pacific Ocean to the south. In total, the Port encompasses approximately 7,500 acres of land and water along 43 miles of waterfront. The Proposed Project site is shown in Figure 1-1.

The Proposed Project site consists of approximately 26.7 acres of waterfront and backland property at Berths 210 and 211 on Terminal Island at POLA. The Proposed Project site includes Accessor Parcel Numbers 7440013907, 7440012902, 7440012902, 7440021914 and 7440029097.

1.2.2 PROJECT OVERVIEW

SA Recycling has operated a scrap-metal recycling facility on the Project site since September 1, 2007 when they obtained assignment of Permit No. 750 under Order #69250. In 2019, the Applicant submitted an Application for Port Permit (APP #190916-128) to the LAHD expressing interest in extending the permit beyond its current termination date of 2024. The Proposed Project being analyzed in this SEIR would amend Permit No. 750 to allow a 15-year extension, which would be carried out in two phases. Phase 1 (Continued Operation) would allow 10 years (2024–2034) of the continued existing operation as scrap-metal facility. Phase 2 (Non-operational Restoration Period) would allow an additional 5 years (2034–2039) for the demolition and excavation of the Project site.

No changes would occur to the use on the Project site during Phase 1, nor new construction or operations, other than routine maintenance or replacement of equipment. The site would continue to be open to receive scrap-metal material Monday through Friday from 6:00 a.m. to 6:00 p.m. and on Saturday from 6:00 a.m. to 3:00 p.m. Operations would continue to occur 24 hours a day during operational days. No construction or operational changes or increases are proposed for the first 10 years.

For the next 5 years during Phase 2, the Applicant proposes to remove all existing equipment, disconnect and remove all utilities in the existing buildings, demolish all existing buildings, and remove all foundations, slabs and concrete for the transportation, recycling or disposal of the material at an approved facility. The Project site will then be remediated to applicable regulatory standards for future industrial use.

1.3 CEQA and the Purpose of an EIR

The California Environmental Quality Act (CEQA) was enacted by the California Legislature in 1970, with the intent that all agencies of the state government that "regulate activities of private individuals, corporations, and public agencies that are found to affect the quality of the environment shall regulate such activities so that major consideration is given to preventing environmental damage while providing a decent home and satisfying living environment for every Californian" (13 Public Resources Code [PRC] 21000. Legislative Intent). Public agency decision makers are required to consider and document the environmental effects on the environment. When a state or local agency determines that a Proposed Project has the potential to affect the environment significantly, an EIR is prepared. The purpose of an EIR is to identify the significant effects of a proposed project on the physical environment, identify alternatives to reduce the proposed project's significant effects while achieving project objectives, and indicate the manner in which a project's significant effects can be mitigated or avoided. A public agency must mitigate or avoid significant environmental impacts of a project it carries out or approves whenever feasible. In instances where significant impacts cannot be avoided or mitigated, the project can nonetheless be carried out or approved if the approving agency finds that economic, legal, social, technological or other benefits outweigh the unavoidable significant environmental effects.

1.4 Lead, Responsible, and Trustee Agencies

The Lead Agency is the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect upon the environment (PRC Section 21067). The Board of Harbor Commissioners (Board) has primary responsibility for approving the Proposed Project as a whole and is the appropriate public agency to act as Lead Agency (CEQA Guidelines Section 15051[b]), including evaluating potential impacts and identifying mitigation measures under state CEQA laws.

Several other agencies have special roles with respect to the Proposed Project and will use this SEIR as the basis for their decision to issue any approvals and/or permits that might be required. Section 15381 of the CEQA Guidelines defines a "responsible agency" as:

> *…a public agency, which proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or negative declaration. For the purposes of CEQA, the term "responsible agency" includes all public agencies other than the lead agency which have discretionary approval power over the project.*

Additionally, Section 15386 of the CEQA Guidelines defines a "trustee agency" as:

> *…a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California.*

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FIGURE 1-1

Regional Location

SA Recycling Amendment to Permit No. 750 Project Draft Subsequent EIR

DUDEK

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Table 1-1 lists the lead, responsible, trustee, state and local agencies that could rely on this Draft SEIR in a review capacity or as a basis for issuance of a permit or other approval for the Proposed Project

Table 1-1. Agencies Expected to Use this SEIR

Agency	Responsibilities, Permits and Approvals
Federal Agencies	
U.S. Environmental Protection Agency (EPA)	Has primary responsibility for implementing the federal Clean Air Act and works with the federal agencies to implement conformity requirements.
State Agencies	
California Department of Fish and Wildlife (CDFW)	Trustee agency with oversight responsibility for tidal and submerged lands legislatively granted in trust to local jurisdictions. Reviews and submits recommendations in accordance with CEQA. Consults with lead agencies in accordance with the Fish and Wildlife Coordination Act. Issuance of Memoranda of Understanding and permits pertaining to take of state-listed species under the California Endangered Species Act.
Department of Toxic Substances Control (DTSC) division of the California Environmental Protection Agency (CalEPA)	Regulatory agency responsible for issuance of Hazardous Waste Generator ID for management of wastes generated by construction and by routine operations.
Regional Agencies	
Regional Water Quality Control Board, Los Angeles Region (LARWQCB)	Permitting authority for federal Clean Water Act (CWA) Section 401 Water Quality Certifications; permitting authority for California Waste Discharge Requirements pursuant to the state Porter-Cologne Water Quality Control Act; and responsible for issuance of both construction and Industrial National Pollutant Discharge Elimination System (NPDES) stormwater permits under Section 402 of the CWA. Issuing authority of municipal separate storm sewer system (MS4) permit of Los Angeles.
South Coast Air Quality Management District (SCAQMD)	Permitting authority for construction and operation of stationary sources at terminal facilities; activities involving hydrocarbon-containing soils (Rule 1166); and new or modified sources of air emissions (New Source Review).
LAHD	The City of Los Angeles, through its Harbor Department, is the Lead Agency for CEQA and the California Coastal Act (via the certified Port Master Plan). Other City departments have various approval and permitting responsibilities, however, and are listed separately below for the sake of clarity. Pursuant to its authority, the LAHD would issue permits and other approvals (e.g., coastal development permits, leases for occupancy of Port land, approval of operating, and joint venture or other types of agreements for the operation of facilities) for the Proposed Project evaluated in this SEIR. LAHD has leasing authority for Port land, permitting authority for construction on Port property, and is responsible for general regulatory compliance, Port Master Plan amendments and map changes, and activities of other City of Los Angeles departments for the Proposed Project evaluated in this Draft SEIR.
City of Los Angeles Building and Safety Department	Permitting authority for building and grading permits. Approves, in conjunction with City of Los Angeles Bureau of Sanitation, any required Standard Urban Stormwater Mitigation Plans or Site-Specific Mitigation Plans/Low Impact Development (LID) requirements. Such plans implement requirements of the MS4 permits issued by the LARWQCB to the City of Los Angeles.
City of Los Angeles Bureau of Sanitation	Permitting authority for Industrial Waste permit for discharge of industrial wastewater to the City sewer system. Approves, in conjunction with the city of Los Angeles Building and Safety Department, any required Standard Urban Stormwater Mitigation Plans or Site-Specific Mitigation Plans/LID requirements that may be necessary to implement MS4 permits issued by the LARWQCB.

Table 1-1. Agencies Expected to Use this SEIR

Agency	Responsibilities, Permits and Approvals
City of Los Angeles Fire Department	Approval of Hazardous Materials Business Plan and Inventory and its Risk Management and Prevention Program. Reviews and submits recommendations regarding designs for building permit.

As indicated in Table 1-1, LAHD is the CEQA lead agency, as defined in State CEQA Guidelines Sections 15050 and 15051, because it has principal responsibility for carrying out and approving the Proposed Project. As the lead agency, LAHD also has primary responsibility for complying with CEQA. As such, LAHD has analyzed the environmental effects of the Proposed Project, the results of which are presented in this SEIR.

1.5 Purpose and Use of SEIR

Pursuant to Public Resources Code (PRC) Section 21166 and State CEQA Guidelines Section 15162, when an EIR has been certified or a negative declaration adopted for a project, no SEIR or negative declaration shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

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

In 1996, LAHD certified an EIR for the Hugo Neu-Proler Lease Renewal Project (SCH No. 93071074) (see Chapter 2, Project Description, for more detailed information on this EIR). The primary objective of the Certified EIR was a permit renewal extending Permit No. 750 through 2024. In addition to the renewal of the permit and continuation of current operations, project objectives included remediation of soil and groundwater contamination at the project site, upgrade or replacement of on-site facilities and equipment, and addition of new facilities and equipment to the operation. The project approved in the 1996 Certified EIR (Approved Project) included remediating soil and groundwater contamination on site; reducing the opportunities for future contamination; improving aesthetics of the site; controlling noise; reducing dust emissions, managing stormwater runoff; and improving efficiency,

capacity, reliability, and general environmental compatibility of the operation. The maximum capacity of the site under the 1996 approved project was 1,300,000 gross tons of scrap metal per year.

The 1996 Certified EIR determined that most potential impacts generated by the Approved Project were less than significant prior to mitigation or were reduced to a less than significant level with mitigation. The 1996 Certified EIR also found the following environmental impacts would be significant and unavoidable despite implementation of the identified mitigation and a Statement of Overriding Considerations was adopted:

- Air Quality (Nitric Oxide and Nitrogen Dioxide [NOx] and Volatile Organic Compounds [VOC] emissions during construction).
- Air Quality (NOx, VOC, and CO [carbon monoxide] emissions during operation).
- Geology (ground shaking).

LAHD also adopted a Mitigation Monitoring and Reporting Program (MMRP) containing 19 mitigation measures to address these impacts, both during construction and operation of the 1996 lease renewal project.

In 2019, the Applicant submitted APP 190916-128 to the Harbor Department expressing interest to extend the existing Permit 750 beyond 2024. In 2021, an Addendum assessing an extension to the Permit was prepared by the Applicant and released for public review from August 12 to October 12, 2021. Comments received from regulatory agencies and community stakeholders requested the Harbor Department evaluate the Proposed Project through a more robust analysis, such as an EIR. After considering the comments and evidence received from commenters on the Previously Proposed Addendum, in addition to changes in circumstances under which the amended/extended permit would continue to be undertaken, the LAHD has elected to prepare this Draft SEIR prior to considering the amended permit for approval. The LAHD will continue to serve as the CEQA lead agency and will give the notice and opportunity for public review as is required under CEQA Guidelines Section 15087. The SEIR will be circulated by itself without recirculating the previous 1996 certified Draft or Final EIR (i.e., the 1996 Certified EIR). Copies of the 1996 certified Draft and Final EIR are available for public review on the Port of Los Angeles' website at: www.portoflosangeles.org/ceqa.

This SEIR is intended to be an informational document to be used by the Board, public agencies, stakeholder organizations and individuals, and the general public during the decision-making process for the Proposed Project. In accordance with the State CEQA Guidelines, this SEIR will inform readers if the implementation of the Proposed Project will cause any new significant environmental impacts or increase the severity of impacts already previously identified in the Certified EIR, identify applicable mitigation measures from the Certified EIR, identify feasible mitigation measures for any new impacts or describe project changes to lessen the Proposed Project's significant impacts. The Board will consider the 1996 SEIR, along with other substantial evidence in the administrative record, when deciding whether to approve the Proposed Project and grant the amendment to Permit No. 750. The Board, in its role as the decision-making body of the LAHD, is responsible for certifying the Final SEIR and adopting the MMRP, Findings of Fact, and Statement of Overriding Considerations pursuant to Sections 15090–15093 of the State CEQA Guidelines (if needed) prior to approval of the Proposed Project. Table 1-2 describes a list of required discretionary Actions that will be taken by the Board.

Table 1-2. List of Required Discretionary Actions

Discretionary Action	LAHD
Certification of Final SEIR	X
Adoption of Mitigation Monitoring and Reporting Program	X
Adoption of Findings of Fact	X
Adoption of Statement of Overriding Considerations (if needed)	X
Approval of Proposed Project	X
Approval of new or amended lease agreement	X

1.6 Scope and Content of the Draft SEIR

As the CEQA lead agency, LAHD is responsible for determining the scope and content of this Draft SEIR, a process referred to as *scoping*. As part of the scoping process, LAHD considered the environmental resources present within its jurisdiction and the surrounding area and identified the probable environmental effects of the Proposed Project by preparing an Environmental Checklist in accordance with the 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 CEQA (Public Resources Code Section 21000, et seq). For those resources which do not warrant further consideration, the Environmental Checklist also explained the basis for scoping out those resources from further environmental consideration in the SEIR.

On March 30, 2023, LAHD posted the Initial Study Checklist and Notice of Preparation (IS/NOP) for a 30-day review period with the County Clerk in accordance with current City of Los Angeles Guidelines for the Implementation of CEQA and Section 15082 of the State CEQA Guidelines. The NOP was mailed to public agencies, organizations, and other interested individuals to solicit their comments on the scope and content of the environmental analysis. A copy of the IS/NOP document was also made available for public review on the Port of Los Angeles website at: https://www.portoflosangeles.org/ceqa.

Print documents were also made available for distribution to interested parties upon request and available for pickup at the Port of Los Angeles Environmental Management Division located at 425 South Palos Verdes Street, San Pedro, California 90731.

LAHD also held a virtual public scoping meeting on April 11, 2023 at 5:00 p.m. Comments received in response to the IS/NOP and during the public scoping meeting were used to inform the scope of this Draft SEIR. The written comments received from the IS/NOP distribution are summarized in Table 1-2. Based on LAHD's preliminary evaluation of the probable effects of the Proposed Project and a thorough review of the comments on the IS/NOP, the Draft SEIR analyzes effects associated with the following resources:

- Air Quality and Meteorology
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards
- Hydrology and Water Quality

Consistent with the findings of the 1996 Certified EIR, it was determined during preparation of the IS/NOP (Appendix A) that the Proposed Project would have either a less-than-significant impact or no impact associated with the following resources: Aesthetics, Agriculture and Forestry Resources,

Biological Resources, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems and Wildfire.

1.6.1 COMMENTS RECEIVED IN RESPONSE TO THE IS/NOP

Twenty-three comment letters and emails were received during the scoping period, and the comments related to the scope of the SEIR are summarized in Table 1-3.

Table 1-3. Summary of Written Comments Received on the Initial Study/ Notice of Preparation

Comment No.	Agency/Organization/Individual Name	Comment Topics	Relevant Draft SEIR Chapter/Section
1	Central City Association	Letter of Support	N/A
2	Native American Heritage Commission	Provided Overview of NAHC Process for Tribal Cultural Resources Consultation	Section 3.2 - Cultural Resources
3	Department of Toxic Substances	Recommended considering outstanding violations and corrective action enforcement	Section 3.1 - Air Quality and Meteorology and Section 3.4 - Hazards
4	Fennec Pulpitoe	Works at the terminal next to SA Recycling. If wind comes from the direction of the facility, they may need to where masks outdoors to protect from odors and particulates coming from the facility.	Section 3.1 - Air Quality and Meteorology
5	Tom Hoffman	Letter of Support	N/A
6	ShareFest	Letter of Support	N/A
7	Propeller Club of Los Angeles/Long Beach	Letter of Support	N/A
8	Wilmington YMCA	Letter of Support	N/A
9	EXP	Letter of Support	N/A
10	Long Beach Chamber of Commerce	Letter of Support	N/A
11	Assemblymember Mike A. Gipson and Senator Bradford	Letter of Support	N/A
12	BizFed	Letter of Support	N/A
13	Ricardo Rojas	Letter of Support	N/A
14	The Beacon House	Letter of Support	N/A
15	National Association for the Advancement of Colored People – San Pedro Branch	Letter of Support	N/A
16	Ramiro Elias	Letter of Support	N/A
17	South Coast Air Quality Management District	Recommendation on Air Quality Management Plan Guidance	Section 3.1 - Air Quality and Meteorology
18	San Pedro Chamber of Commerce	Letter of Support	N/A
19	Robert Barney	Letter of Support	N/A

Table 1-3. Summary of Written Comments Received on the Initial Study/ Notice of Preparation

Comment No.	Agency/Organization/Individual Name	Comment Topics	Relevant Draft SEIR Chapter/Section
20	LA Sanitation	The Proposed Project is unrelated to sewers and does not require further analysis. Recommends addressing outstanding violations and corrections.	Section 3.5 - Hydrology and Water Quality
21	Board of Future Ports	Letter of Support	N/A
22	Los Angeles Maritime Institute	Letter of Support	N/A
23	Boys & Girls Clubs of Long Beach	Letter of Support	N/A

Six commenters provided input at the virtual public scoping meeting held on April 11, 2023, all in support of the Proposed Project. There were no written comments received at the scoping meeting. The IS/NOP and copies of all IS/NOP comment letters are provided in Appendix A.

1.7 Organization of the Draft SEIR

The content and format of this Draft SEIR are designed to meet the requirements of CEQA and State CEQA Guidelines Article 9. This Draft SEIR is organized as follows:

The **Executive Summary** includes a brief summary of the Proposed Project; identifies each significant effect, including proposed mitigation measures to reduce or avoid the effect; identifies the areas of controversy known to the lead agency, including issues raised by agencies and the public; and summarizes the issues to be resolved, including whether or how to mitigate the significant effects (State CEQA Guidelines Section 15162 and PRC 21166).

Chapter 1, Introduction, discusses the purpose of CEQA and this Draft SEIR, the scope and content of this Draft SEIR, a list of the required Proposed Project approvals and other agencies that must consider aspects of the Project and the scope and content of the document, the availability of the Draft SEIR, and brief outline of the organization of this Draft SEIR, and the intended uses for this Draft SEIR (State CEQA Guidelines Section 15124[d]).

Chapter 2, Project Description, contains both a map of the precise location and boundaries of the Proposed Project and its location relative to the region; lists the Proposed Project's central objectives, underlying purpose, as well as Project benefits; and provides a detailed description of the Proposed Project's characteristics (State CEQA Guidelines Section 15124[a], [b], and [c]).

Chapter 3, Environmental Analysis, describes the existing physical conditions for each resource area in the environmental setting, lists the applicable laws and regulations germane to the specific resource in the regulatory setting, describes the impact assessment methodology, lists the criteria and thresholds for determining whether a new significant impact or a substantially more severe impact than previously analyzed would result from implementation of the Proposed Project, and lists feasible mitigation measures that would eliminate or reduce the identified significant impacts (State CEQA Guidelines Sections 15162 and PRC 21166).

Chapter 4, Cumulative Analysis, discusses the cumulative effects of the Proposed Project in combination with the effects of other past, present and reasonably foreseeable projects in its vicinity.

Chapter 5, Significant Irreversible Changes, describes the significant irreversible changes to the environment associated with the Proposed Project.

Chapter 6, References, provides a comprehensive listing by chapter of all references cited in this Draft SEIR (State CEQA Guidelines Section 15148).

Chapter 7, List of Preparers and Contributors, lists the individuals and agencies involved in preparing this Draft SEIR (State CEQA Guidelines Section 15129).

Chapter 8, Acronyms and Abbreviations. provides the full names for acronyms and abbreviations used in this document.

Appendices present additional background information and technical detail for several of the resource areas.

1.8 Key Principles Guiding Preparation of this Draft SEIR

1.8.1 EMPHASIS ON SIGNIFICANT ENVIRONMENTAL EFFECTS

This Draft SEIR focuses on the significant environmental effects of the Proposed Project and their relevance to the decision-making process. The following sections describe the general framework for analysis under CEQA. These summaries are not meant to capture the legal nuances that have developed through the passage and amendment of various statutes and regulations, and from corresponding judicial decisions, rather, the summaries are meant to communicate a general understanding of this act.

"Environmental impacts," as defined by CEQA, include physical effects on the environment. The State CEQA Guidelines (Section 15360) define the environment as follows:

> *The physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, ambient noise, and objects of historic or aesthetic significance*.

This definition does not include strictly economic impacts (e.g., changes in property values) or social impacts (e.g., a particular group of persons moving into an area). The State CEQA Guidelines (Section 15131[a]) state that "economic or social effects of a project shall not be treated as significant effects on the environment." However, economic or social effects are relevant to physical effect in two situations. In the first, according to Section 15131(a) of the State CEQA Guidelines, "An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes….to physical changes caused in turn by the economic or social changes." In other words, if an economic or social impact leads to a physical impact, this ultimate physical impact would be evaluated in the EIR. In the second instance, according to Section 15131(b) of the State CEQA Guidelines: "Economic or social effects of a project may be used to determine the significance of physical changes caused by the project."

As with economic or social impacts, psychological impacts are outside the definition of the term "environmental." While not specifically discussed in the State CEQA Guidelines, the exclusion of psychological impacts was specifically affirmed in the 1999 court decision *National Parks and Conservation Association v. County of Riverside 71 Cal. App. 4th 1341 and 1364 (1999)*.

In view of these legal precedents, LAHD is not required to treat economic, social or psychological impacts as significant environmental impacts absent a related physical effect on the environment.

Therefore, such impacts are discussed only to the extent necessary to determine the significance of the physical impacts of the Proposed Project.

1.8.2 FORECASTING

In this Draft SEIR, LAHD and its consultants have made their best efforts to predict and evaluate whether implementation of the Proposed Project would cause any new or more severe reasonably foreseeable, direct, indirect, and cumulative environmental impacts beyond what was previously studied. CEQA does not require LAHD to engage in speculation about impacts that are not reasonably foreseeable (State CEQA Guidelines Sections 15144 and 15145). CEQA does not require a worst-case analysis.

1.8.3 RELIANCE ON ENVIRONMENTAL THRESHOLDS AND SUBSTANTIAL EVIDENCE

The identification of impacts as "significant" or "less than significant" is one of the important functions of an SEIR. New significant impacts or impacts that are more severe than those previously identified in the Certified EIR need to be acknowledged in the SEIR, and applicable mitigation measures from the SEIR or new feasible mitigation measures for any impact identified as "significant" should be identified. In preparing this document, LAHD has based its conclusions about the significance of environmental impacts on identifiable thresholds and has supported these conclusions with substantial scientific evidence and publicly available information.

The criteria for determining the significance of environmental impacts in this analysis are described in each resource section in Chapter 3, Environmental Analysis. The "threshold of significance" under CEQA for a given environmental effect is the level at which LAHD finds a potential effect of the Proposed Project to be significant. "Threshold of significance" can be defined as a "quantitative or qualitative standard or set of criteria, pursuant to which significance of a given environmental effect may be determined." (State CEQA Guidelines, Section 15064.7[a]).

1.8.4 DUTY TO MITIGATE

According to Section 15126.4(a) of the State CEQA Guidelines, each new or more substantially severe significant impact identified in an SEIR must include a discussion of applicable mitigation measures from the Certified EIR or feasible mitigation measures that would avoid or substantially reduce the significant environmental effect. To reduce significant effects, mitigation measures must avoid, minimize, rectify, reduce, eliminate, or compensate for a given impact of the Proposed Project. Mitigation measures must satisfy certain requirements to be considered adequate. Mitigation should be specific and enforceable, define feasible actions that would demonstrably improve significant environmental conditions, and allow monitoring of their implementation. Mitigation measures that merely require further studies or consultation with regulatory agencies and are not tied to a specific action that would directly reduce impacts, or that defer mitigation until some future time, are not adequate.

Effective mitigation measures clearly explain objectives and indicate how a given measure should be implemented, who is responsible for its implementation, and where and when the mitigation would occur. Mitigation measures must be enforceable, meaning the lead agency must ensure the measures would be imposed through appropriate permit conditions, agreements, or other legally binding instruments.

Section 15041 of the State CEQA Guidelines grants public agencies the authority to require feasible changes (mitigation) that would substantially lessen or avoid a significant effect on the environment associated with activities involved in a project. Public agencies, however, do not have unlimited

authority to impose mitigation. A public agency might exercise only those express or implied powers provided by law, aside from those provided by CEQA. However, where another law grants discretionary powers to a public agency, CEQA authorizes use of discretionary powers (State CEQA Guidelines Section 15040).

In addition to limitations imposed by CEQA, the U.S. Constitution limits the authority of regulatory agencies. The Constitution limits the authority of a public agency to impose conditions to those situations where a clear and direct connection ("nexus" in legal terms" exists between a project impact and the mitigation measure. Finally, a proportional balance must exist between the impact caused by the project and the mitigation measure imposed upon the project applicant. A project applicant cannot be forced to pay more than its fair share of the mitigation, which should be roughly proportional to the impact(s) caused by the project.

1.8.5 SCOPE OF ANALYSIS

This document has been prepared by Dudek under contract to the LAHD and has been reviewed independently by City staff. The scope of the document, methods of analysis and conclusions represent the independent judgments of the City, Staff members from the LAHD and Dudek who helped prepare this Draft SEIR are identified in Chapter 7, List of Preparers and Contributors.

1.9 Availability of the Draft SEIR

The Draft SEIR for the Proposed Project is being distributed directly to agencies, organizations, and interested groups and persons via distribution by the Governor's Office of Planning and Research, the Los Angeles County Clerk, direct mail and email for comment during the formal review period in accordance with Section 15087 of the State CEQA Guidelines. A 45-day comment period has been established, which begins on January 4, 2024 and ends on February 19, 2024, during which the Draft SEIR is available for general public review at the following location:

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

Please call (310) 732-3615 or email ceqacomments@portla.org to schedule document review. In addition to printed copies of the Draft SEIR, electronic versions are available. Due to the size of the document, the electronic versions have been prepared as a series of PDF files to facilitate downloading the printing. Members of the public can request a flash drive containing this document. The Draft SEIR is available in its entirely on the Port of Los Angeles website at www.portoflosangeles.org/ceqa.

Interested parties may provide written comments on the Draft SEIR, which must be postmarked by January 4, 2024. Please address comments to:

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

Comments can also be submitted via email. Emailed comments should include the title of the Project in the subject line. Email comments should be sent to ceqacomments@portla.org.

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Chapter 2

Project Description

2.1 Introduction

This section of the Draft Subsequent Environmental Impact Report (Draft SEIR) provides background information related to existing operations at the SA Recycling Project site as well as information required of a Project Description pursuant to CEQA Guidelines Section 15124. This section also provides a discussion of the existing environmental setting (or CEQA baseline) that forms the basis of the environmental analysis in Chapter 3, Environmental Analysis.

2.2 Background and Project Overview

2.2.1 BACKGROUND

The Proposed Project site consists of approximately 26.7 acres of waterfront and backland property at Berths 210 and 211 on Terminal Island at Port of Los Angeles (POLA or Port). (See Figure 2-1, Regional Location.) Prior to 1962, the Proposed Project site was used for constructing and dismantling ships. In 1962, Hugo Neu-Proler Company began operating a scrap-metal recycling site. In 1996, POLA approved Permit No. 750 with the Hugo Neu-Proler Company along with the Certified Environmental Impact Report (EIR). Sims Group Ltd acquired substantially all of the recycling operations of Hugo Neu-Proler on October 31, 2005. In December 2005, the new company applied for a subsidiary name change to Sims Hugo Neu West. On September 1, 2007, the Sims Group and Adams Steel formed a joint venture creating SA Recycling LLC (Applicant). SA Recycling has continued operating a scrap metal recycling site at the Proposed Project site under Permit No. 750. On August 7, 2010, POLA approved an assignment of Permit No. 750 from Sims Hugo Neu West to SA Recycling LLC (Order 69250).

2.2.2 PREVIOUS ENVIRONMENTAL DOCUMENTATION

Hugo Neu-Proler Lease Renewal Project EIR, 1996

In 1996, Los Angeles Harbor Department (LAHD) certified an EIR for the Hugo Neu-Proler Lease Renewal Project (SCH No. 93071074) (1996 Certified EIR). The primary objective of the 1996 Certified EIR was a permit renewal extending operations through 2024. In addition to the renewal of the permit and continuation of the then existing current operations, the project objectives included remediation of soil and groundwater contamination at the Project site, as well as new, upgraded or replacement of on-site facilities and equipment. The project approved in the 1996 Certified EIR contemplated a maximum operation of up to 1.3 million gross tons of throughput and included the following components:

New facilities and equipment:

1. Rail trackage and associated structures to allow reintroduction of rail service to the site.
2. Landscaped, 4,000-square-foot, single-story office building and parking area at the south end of the site.
3. Fully covered the scrap processing, handling, and storage area with asphalt or concrete.
4. Additional lighting in storage, loading, and parking areas.
5. Stormwater runoff control and treatment system.
6. Noise barriers at strategic locations, as required.
7. Perimeter wall around the site to improve aesthetics.

8. Bin walls around scrap handling area to help control scrap piles.
9. Auto shredder residue storage facility.

The upgrades or replacements:

1. Upgraded the bulk ship-loading structure, used to load scrap into ships, to increase its loading rate.
2. Changed water recirculation system and feed system to the non-ferrous metal recovery equipment.
3. Improved the ferrous and non-ferrous metals storage and handling equipment.
4. Replaced the diesel fuel storage tank and provided new dispensing equipment.
5. Replaced the underground gasoline storage tanks with new aboveground gasoline storage tank and provided new dispensing equipment.
6. Added a new scale to the existing scale system to accommodate rail service.
7. Converted office building into a changing room, shower room, and conference rooms.
8. Replaced a dockside gantry crane, used to load ships, with a larger duty cycle dockside diesel hybrid electric crane.

The project approved in 1996 after completion of the Certified EIR included remediating soil and groundwater contamination on site; reducing the opportunities for future contamination; improving aesthetics of the site; controlling noise; reducing dust emissions, managing stormwater runoff; and improving efficiency, capacity, reliability, and general environmental compatibility of the operation. As noted above, with the planned new facilities and equipment modifications, the projected throughput of the site under the 1996 approved project (Approved Project) was 1,300,000 gross tons of scrap per year.

The Certified EIR determined that most potential impacts generated by the previously Approved Project were less than significant prior to mitigation or were reduced to a less than significant level with mitigation. The 1996 Certified EIR also found the following environmental impacts would be significant and unavoidable despite implementation of the identified mitigation and a Statement of Overriding Considerations was adopted:

- Air Quality (nitrogen oxides [NOx] and nitrogen dioxide [NO2] and volatile organic compound [VOC] emissions during construction)
- Air Quality (NOx, VOC, and carbon monoxide [CO] emissions during operation)
- Geology (ground shaking)

LAHD also adopted the MMRP containing 19 mitigation measures to address these impacts, both during construction and operation of the 1996 lease renewal project.

Crane Replacement and Electrification Project Initial Study/Negative Declaration, 2016

In 2016, an Initial Study/Negative Declaration (IS/ND) was prepared and approved for the crane replacement and electrification project (SCH 2016021009). SA Recycling replaced an older diesel mobile crane with a new diesel electric hybrid crane.

Previously Proposed Addendum to the Hugo Neu-Proler Lease Renewal Project EIR, 2019

In 2019, the Applicant submitted an Application for Port Permit (APP) 190916-128 to the Harbor Department expressing interest to extend the existing Permit 750. In 2021, an addendum assessing an extension to the Permit was prepared by the Applicant and released for public review from August 12 to October 12, 2021. Comments received from regulatory agencies and community stakeholders requested the LAHD evaluate the Proposed Project through a more robust analysis, such as an EIR. After considering the comments and evidence received in support of those comments, the LAHD decided not to adopt the addendum and decided to conduct further environmental analysis as part of an SEIR. It was also

determined that the Proposed Project would not affect any federal permits or require any federal approvals. Therefore, no National Environmental Policy Act (NEPA) evaluation was required.

2.3 Project Purpose, Need, and Objectives

2.3.1 PURPOSE AND NEED

The Proposed Project seeks an amendment to Permit No. 750 to allow for an up to 10-year extension of existing operations, with up to 5 additional years for use of the site as a non-operational restoration period for any necessary closure and remediation activities to restore the property. The extension is for continued operation of the site as a scrap metal recycling facility with no changes to the scope of the permit or use of the Proposed Project site. No new construction or operations are proposed, other than routine maintenance or replacement of equipment. The up to an additional 5-year extension will be provided to allow for closure and restoration of the property.

2.3.2 PROJECT OBJECTIVES

The Proposed Project would address the project objectives, as summarized below:

- Extending the Applicant's existing Permit a period of up to 10 years for continued operation and up to an additional 5 years to restore the property.
- Maintain the use of an existing permitted metal recycling site for 10 years to provide long-term scrap metal reclamation and recycling capacity consistent with applicable local and state regulatory requirements.
- Utilize an existing permitted metal recycling site to continue providing economical, efficient and safe metal recycling and bulk export by vessel in the Southern California region to meet current and future anticipated demands.
- Allow for ongoing metal recycling activities while ensuring the protection of health, safety and the environment.
- Ensure restoration of the project site consistent with foreseeable future requirements, including by removing the structures and installations from the SA Recycling premises in accordance site closure and remediation work plans, as required by the LAHD and trustee/responsible agencies.
- Prevent the release or threatened release of hazardous substances from uses on the Project site.

2.4 Project Location and Setting

2.4.1 REGIONAL SETTING

The Proposed Project is within POLA, which is in the San Pedro Bay in the City of Los Angeles in Los Angeles County, approximately 20 miles south of downtown Los Angeles. The Port is on the southern side of the City of Los Angeles and adjacent to the communities of San Pedro to the west, Wilmington to the north, the Port of Long Beach to the east, and the Pacific Ocean to the south. In total, the Port encompasses approximately 7,300 acres of land and water along 43 miles of waterfront. The Proposed Project site is shown in Figures 2-1 and 2-2.

2.4.2 SURROUNDING AND NEARBY LAND USE

The Proposed Project site is located at Berths 210 and 211 at the POLA at 901 New Dock Street on Terminal Island. The site is bounded by a channel within POLA to the north, shipping container terminals to the east and west, and New Dock Street and railroad right-of-way to the south (see Figure 2-1).

The Proposed Project site is approximately 0.25 miles north of State Route 47 (Seaside Freeway), about 2 miles east of Interstate 110, and approximately 1.3 miles west of Interstate 710 (segment on Terminal Island) (see Figure 2-2). Vehicle access to the Proposed Project site is provided from New Dock Street and Pier S Avenue. Regional vehicular access is provided from State Route 47, Interstate 710, Interstate 110, and State Route 103. Marine vessels access the Proposed Project site via channels in POLA. A railway along New Dock Street provides rail access to the Proposed Project site.

2.4.3 EXISTING 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 (Board) and certified by the California Coastal Commission (CCC). The PMP includes five planning areas. The Proposed Project site and the surrounding uses are in Planning Area 3, Terminal Island (LAHD 2018). Planning Area 3, the largest planning area, consists of all POLA property on Terminal Island with the exception of Fish Harbor and includes six of LAHD's nine container terminals.

The Proposed Project site has a PMP mixed land use designation of both Container and Dry Bulk. To the east of the Proposed Project site, properties have mixed land use designations of Container, Dry Bulk, and Breakbulk. To the south and west of the Proposed Project site, properties have a land use type of Container.

The City's Zoning Information and Map Access System (ZIMAS) (City of Los Angeles 2022) shows that the Proposed Project site, which includes Accessor Parcel Number 7440013907, 7440012902, 7440012902, 7440021914 and 7440029097, and surrounding properties are zoned Qualified Heavy Industrial with Height District 1 ([Q]M3-1) and have a General Plan Land Use designation of General/Bulk Cargo (Non-Hazardous Industrial and Commercial). Height District 1 does not provide a height limit for manufacturing designations but restricts floor area ratios to 1.5 to 1.

FIGURE 2-1

Regional Location

SA Recycling Amendment to Permit No. 750 Project Draft Subsequent EIR

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FIGURE 2-2

Local Vicinity

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2.4.4 PROJECT SITE

Since 1962, operations on the Proposed Project site have involved scrap-metal recycling. The Applicant took over operations at the Proposed Project site in 2007. Currently, SA Recycling operates a scrap metal recycling site on the Proposed Project site under POLA Permit No. 750. Recyclable metal is transported to the Proposed Project site via truck and rail line where it is sorted, shredded or sheared, stockpiled, and eventually exported to overseas markets via bulk ships. Ferrous metals are exported via bulk ships overseas and non-ferrous metals are transported via container trucks to other Port terminals. See below for a more detailed discussion of the current operations. The long-term permit was renewed following the certification of the 1996 Certified EIR. The types of operations that are ongoing at the site today, although tonnage has varied, are similar to the types of operations when Permit No. 750 was approved in 1996, except for the subsequent improvements to operations and the environmental footprint of the site, including:

- Enclosing the downstream metal separation processing equipment.
- Installation of "best available control technology (BACT)" Air Pollution Control (APC) devices consisting of particulate and moisture filters, a regenerative thermal oxidizer (RTO), and a scrubber
- Replacement of a diesel-powered crane with a diesel electric hybrid crane for loading the deep-water ships
- Replacement of older equipment with Tier 4 equipment meeting current emissions standards

2.4.5 CURRENT OPERATIONS

The Proposed Project site is a full-service metal recycling and processing operation. The Proposed Project site is approximately 26.7 acres (see Figure 2-3, Aerial Photograph, and Figure 2-4, Dust Control and Noise Suppression Site Plan). Currently, nearly 100% of the site is paved. Only a small, landscaped area by the office at the site entrance is unpaved.

The Project site currently consists of an Office Building, Warehouse, Maintenance Shop, Motor Room, Shear Room, Shaker/Plate rooms, and two Covered Secondary Containment areas. The buildings are occupied by approximately 130 employees.

The site accepts all types of scrap metal, including ferrous metal, non-ferrous metal, end-of-life vehicles, domestic appliances, demolition scrap (plate and structural beams), busheling (brand-new manufacturing scrap), and other recycled metals.

The site prohibits the following items: asbestos, radioactive materials or closed containers, propane tanks, ammunition shells and other explosive ordnance. Any prohibited items found in loads are either returned to the customer or set aside for proper management/disposal.

The recycling services provided at the facility include manufacturing scrap services, appliance recycling, automobile recycling, certified destruction, and demolition scrap. The finished grade of scrap metal is furnace ready (ready to be melted down).

The site primarily receives scrap metal from southern California via heavy duty trucks (maximum gross vehicle weight of 80,000 pounds). Approximately 280 haul trucks visit the site per day from the Southern California region. Most truck trips average 25 to 30 miles. The trucks que on the driveway while waiting to enter the site. The waiting time to enter averages 5 minutes; however, the truck drivers entering the site must comply with the Airborne Toxic Control Measure set forth in Title 13, California Code of Regulations (CCR), Section 2485, that requires drivers of diesel-fueled commercial motor

vehicles weighing over 10,000 pounds to not idle the vehicle's primary diesel engine longer than 5 minutes at any location.

A small portion of shredded scrap metal also arrives via rail car from SA Recycling facilities in the western United States. The site receives approximately three rail cars per day.

The scrap metal is processed depending on the size and type of material involved. Heavier materials like plate and structural steels and pipe are sent to the hydraulic shears (mobile and stationary) where the material is sheared into smaller uniform lengths of less than 5 feet. The site also receives finished grades of scrap metal such as busheling and heavy melt steel, that are simply put into stockpiles to await the next ship (see Figure 2-4).

Materials such as flattened automobiles and appliances and other lighter materials are sent to the state-of-the-art mega electric/hydraulic shredder that shreds large volumes of metal in just seconds. Shredded material is separated into magnetic materials (ferrous steel) and non-magnetic materials (non-ferrous metals, copper, aluminum, and stainless steel) using drum magnets to recover magnetic materials and a non-ferrous metal recovery plant utilizing eddy-current magnetic sorting system along with other technologies to recover non-magnetic metallic materials. Materials are then moved to storage areas via conveyor belt or diesel-fueled mobile equipment where they are stockpiled for transport. The shredder is equipped with an APC system that filters particulates, oils, and moisture, an RTO powered by natural gas destroys VOCs and chlorofluorocarbons (CFCs) and a chemical scrubber that neutralizes residual acid gases. The shredder is primarily run at night due to the power demand constraints.

Materials that are too big for the shredder (such as buses, containers, and trucks) are first sheared or cut via a mobile shear and then shredded. Most vehicles arrive at the yard flattened and processed such that materials that require special handling have already been removed (drained of fluids, batteries removed, etc.). A small number of whole (non-flat) buses and trucks that arrive at the yard may be pre-processed on site. Each waste stream from this process is handled separately as hazardous waste or recyclable material and properly managed for off-site disposal.

The majority of processed materials (approximately 100,000 tons per month) are loaded onto 40,000 to 45,000 metric ton (MT) bulk ships that dock at Berths 210 and 211 and then sailed to ports primarily in Southeast Asia. The rest of the processed materials (primarily non-ferrous metals) are loaded into containers, which are transported via truck to a Port terminal for loading onto container vessels. Scrap materials are loaded onto the ships via diesel mobile equipment (2 to 3 dump trucks), and a diesel electric hybrid crane (operated in electric mode only). The ships are guided into the berths via tugboats and are usually at berth for 3 to 4 days while the vessel is being loaded.

Approximately 72% of the shredder feedstock is ferrous steel and 6% is recovered as non-ferrous metals (the remaining 22% is Metal Shredder Residue [MSR] consisting of plastics, upholstery, foam, rubber, glass, etc.). Following recovery of valuable copper, aluminum and non-ferrous metals, the waste is stabilized on site with phosphate/silicate liquid chemistry with a proprietary cement blend. This creates a stabilized mix that is transported to a landfill for use as alternative daily cover.

FIGURE 2-3

Aerial Photograph

SA Recycling Amendment to Permit No. 750 Project Draft Subsequent EIR

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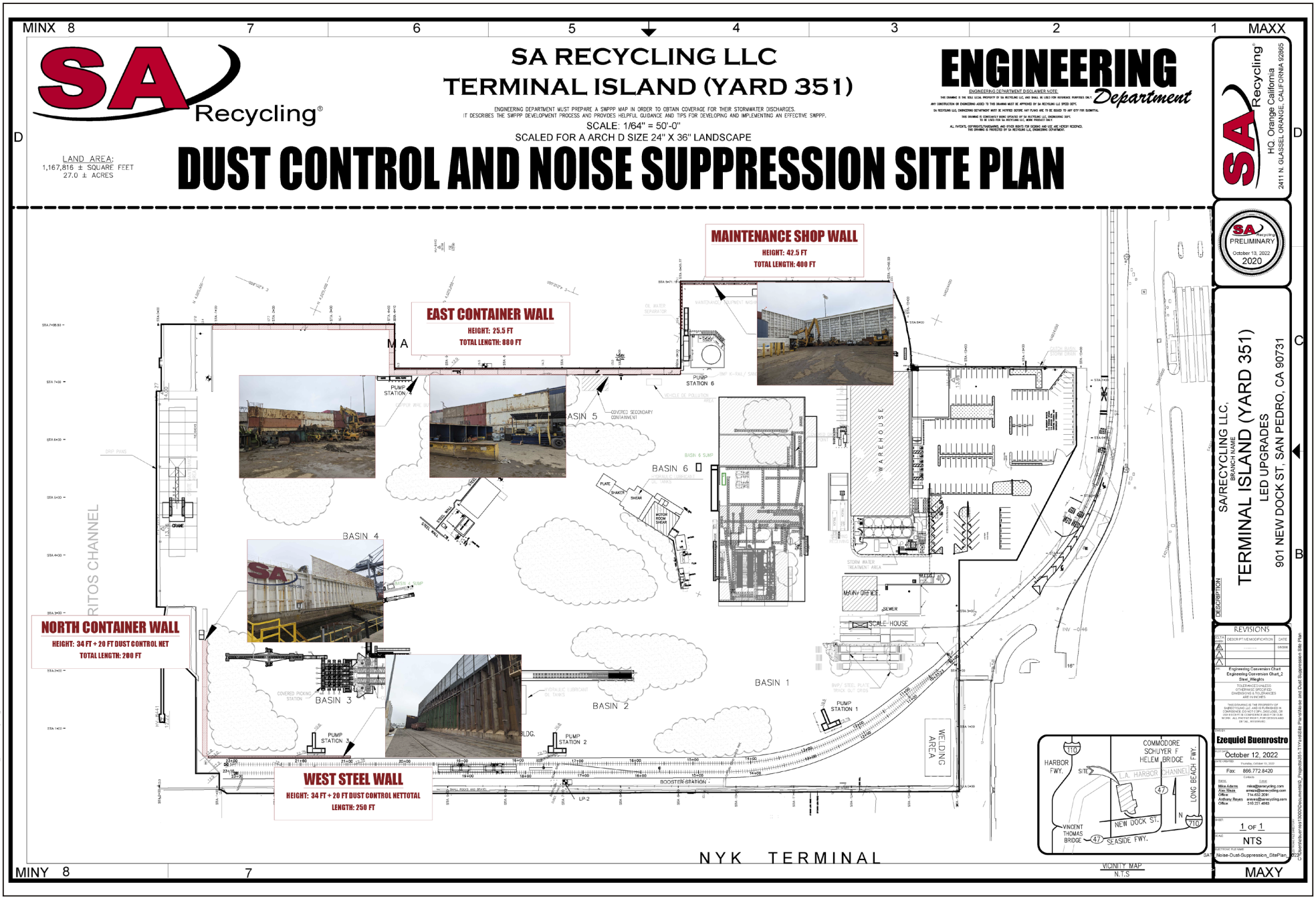

FIGURE 2-4

Dust Control and Noise Suppression Site Plan

SA Recycling Amendment to Permit No. 750 Project Draft Subsequent EIR

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2.4.6 REGULATORY AGENCY PERMITS

Air Quality

SA Recycling is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Air permits issued by the SCAQMD include "permits to operate" for the shredder (G62700), the metals recovery plant (G63649), the shredder APC system (G70037), and the shear (G70628). Since SA Recycling acquired the Terminal Island site, they have continually added and upgraded the APC equipment, which substantially reduces potential emissions. The SCAQMD APC permit requires that the RTO VOC destruction efficiency exceed 95%. The APC consists of the following:

- A dust and mist collection system (TAME unit) that filters particulates, oils, and moisture.
- RTO, powered by natural gas, that destroys VOCs and CFCs via thermal oxidation.
- A chemical scrubber that neutralizes residual acids in the gas stream.

In addition to the APC, the site employs the following measures to control emissions:

- Non-ferrous aggregate materials are placed in containment buildings.
- Water is routinely applied to shredder feedstock.
- A vacuum sweeper truck is used to clean yard entrances and driveways.
- Water is applied to the yard, haul roads, and material piles.

The shredder and the APC are typically operated from Monday through Fridays from 8:00 p.m. to 3:00 a.m. (these hours are the non-peak hours when electricity rates from Los Angeles Department of Water and Power [DWP] are not at their peak levels as DWP disincentivizes the use of industrial equipment during such peak use hours which are normally mid- to late-afternoons). On occasion the applicant may use the shredder from 3:00 p.m. to 1:00 a.m. on Saturdays or load a ship on Sundays. The operational schedule is not substantially different in the summer versus the winter as the hours are determined primarily by the DWP rates and product volume that is available for processing.

Dust Control Measures

In order to control dust within the SA Recycling site, every dump truck load that is fed into the shredder is wetted with approximately 100 gallons of recycled water. A water truck with an 8,000 gallon capacity traverses the yard wetting the site. The water truck is refilled approximately 15 times per day with recycled water from the water reclamation treatment on site. The shredding facility uses multiple sprinklers for dust control of approximately 40,000 gallons of water per day of operations. The shredder operates a water injection that uses an average of 35,000 gallons of recycled water and fresh water for dust and temperature control. In addition, every load/swing that goes on the ship is wetted with a water cannon of approximately 60 gallons of fresh water. The site averages approximately 800 swings per vessel; thus, 50,000 gallons of fresh water is required per vessel.

Surface Water Quality

SA Recycling is under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). Stormwater discharges from SA Recycling Terminal Island are permitted under the State Water Resources Control Board (SWRCB) General Permit to Discharge Storm Water Associated with Industrial Activity (General Permit No. CAS000001), adopted by the LARWQCB on April 1, 2014, Order No. 2014-0057-DWQ as amended in 2015 and 2018. The Waste Discharger Identification number is "419I021125."

Nearly 100% of the Proposed Project site is paved with an impervious cap, except for small, landscaped areas by the office building. The cap undergoes inspections on a regular basis and any signs of degradation or cracks are repaired, as needed. The site is designed to capture all stormwater and dust control water from the yard for reuse on site. In rare instances, when stormwater cannot be contained for use on site, it is chemically treated and discharged to either of two storm drains, one near the site entrance and one on adjacent LAHD property. Both drains connect to the Cerritos Channel.

Stormwater is collected in underground basins throughout the site, with a total capacity of approximately 90,000 gallons. There are also 10 aboveground storage tanks on site that each have 42,000 gallon capacity. SA Recycling employs a multi-stage chemical treatment process to mitigate possible stormwater pollution. This process 1) effectively reduces the concentrations of contaminants of concern, 2) does not rely on significant changes in pH or other basic parameters, and 3) is consistent with the Best Available Technology Economically Achievable (BAT)/BACT mandate established in the General Permit. All stormwater exposed to industrial activity (i.e., receiving, shredding, depollution, dismantling, welding, torch-cutting, materials storage and recovery) is captured and reused, or treated prior to discharge.

Soil and Groundwater Quality

On August 26, 1988, a release of diesel fuel was reported for the Proposed Project site that resulted in a free-phase hydrocarbon plume on the surface of the water table in the vicinity of the warehouse. Several investigations of subsurface soil and groundwater were conducted from 1990 to 1994 under the oversight of the LARWQCB to assess the environmental impact from vadose zone soils, which were determined to be impacted by petroleum hydrocarbons, metals, polychlorinated biphenyls (PCBs), and polycyclic aromatic hydrocarbons (PAHs). Low-level detections of methyl tert-butyl ether and tert-butyl alcohol were present but were attributed to an unknown off-site source (Mittelhauser Corp. 1994). The LARWQCB required Hugo Neu-Proler to add an engineered concrete cap to all of the property and to conduct semiannual groundwater monitoring as part of the remediation plans for soil and groundwater contamination. The concrete cap was designed to prevent soil or groundwater contamination from ongoing site activities. The LARWQCB's minimum requirements for the concrete cap are 6 inches of concrete pavement over a minimum of 8 inches of base rock or other base material.

A baseline risk assessment was completed in January 1995, and the results were used to develop industrial soil cleanup levels for the Proposed Project site. In accordance with the requirements of the LARWQCB's Waste Discharge Requirements (WDR) Order No. 96-020 (File No. 90-47), issued on April 1, 1996, several requirements were established related to soil remediation activities and groundwater monitoring, in accordance with a Monitoring and Reporting Program (MRP) (File No. 7656). Remediation and free product removal associated with the underground storage tank (UST) release was continued under LARWQCB oversight separate from the WDR and associated MRP. Although on-site fixation and burial of the fixated material was approved, Hugo Neu-Proler elected to transport all excavated material off site for disposal during remediation activities. From 1999 to 2002, soils impacted above the 1996 WDR cleanup levels were excavated, and soil confirmation sampling was completed with the oversight of LAHD and LARWQCB.

Approximately 80,000 cubic yards of soil were excavated and transported off site for legal disposal. Concurrent with the excavation and sampling procedures, once an area met established cleanup levels, it was backfilled, graded, and capped with concrete. Based on this change in the site remediation program, SA Recycling requested the LARWQCB to rescind the WDR because no fixated soil was discharged to the site. The WDR was terminated on April 7, 2012.

Site activities and analytical results were summarized in quarterly "supplemental remediation progress" reports. These reports were subsequently reviewed by LAHD and the LARWQCB.

Confirmation samples collected from across the site demonstrated that all constituents were significantly below the criteria established in the 1996 WDR.

Semi-annual groundwater sampling has been conducted since 1997. Previously under the WDR and MRP, all accessible site wells were gauged quarterly, and the eight wells listed in the MRP (MW-1, MW-2, MW-4A, MW-5, MW-6, MW-7A, MW-8, and MW-16) were purged and sampled in December and June of each year. Monitoring of the well network was required by the WDR and MRP to evaluate the groundwater in order to further evaluate the free product plume on site. When the WDR and MRP were rescinded in 2012, groundwater monitoring continued in order to monitor the perimeter of the free product plume (discussed below).

Free product recovery due to the UST release is ongoing, as is associated groundwater monitoring. This monitoring is conducted under the oversight of the LARWQCB (File No 90-47). Since the WDR was rescinded in 2012, groundwater monitoring was decreased to only monitor total petroleum hydrocarbons in the gasoline, diesel, and motor oil ranges and VOCs, and only around the perimeter of the free product plume. The modified groundwater monitoring program also include semi-annual gauging of 15 wells (MW-1, MW-2, MW-5, MW-9, MW-12 through MW-18, B-1, B-2, B-13, and RW-1) and decreased the number of groundwater monitoring wells to be sampled from eight to five (MW-1, MW-2, MW-12, MW-16, and MW-18). The modified groundwater monitoring program began in June 2012. As requested by LARWQCB, a conceptual site model was prepared to estimate the light non-aqueous phase liquid (LNAPL) profile across the site. Initially, the hydrocarbon plume volume was estimated to range between 2,900 and 5,100 gallons of product covering approximately 13,500 square feet; by 2015 the estimated volume was 1,994 gallons covering approximately 9,000 square feet. Free product is removed from the site wells using a combination of passive skimmers, hand bailing, and absorbent socks. SA Recycling records LNAPL thicknesses on a weekly basis and summarizes the free product recovery volume in quarterly progress reports to the LARWQCB.

Waste and Hazardous Waste

SA Recycling receives many types of scrap metal—automobiles, consumer and industrial appliances, manufacturing scrap, demolition scrap, consumer/homeowner scrap, etc. All scrap metal brought to the site is screened by radiation detectors before being offloaded. Scrap metal is sorted, shredded or sheared, then stockpiled and loaded onto ships for transport to overseas markets. The site reported a total input tonnage to the shredder of 454,500 metric tons in fiscal year 2021/2022. The scrap metal going into the shredder consisted of 42% automobiles, 43% appliances, and 14% miscellaneous. The site has an average of 100,000 tons of ferrous and non-ferrous scrap metal on site at any given time (SA Recycling 2015).

All materials received at the site meet the definition of “scrap metal” under Title 22, CCR, Section 66260.10. Scrap metal is specifically excluded from regulation as waste.

The process of separating the metal components from the shredded scrap metal generates a non-metal residue that is generically called Metal Shredder Residue (MSR). MSRs are chemically fixated such that they do not have soluble concentrations of contaminants of concern (chemically treated MSR or CTMSR). In the late 1980s, the Department of Health (predecessor of the DTSC) determined that the metal treatment fixation process of metal shredder waste (i.e. CTMSR) was capable of lowering soluble concentrations of contaminants of concern in metal shredder residue such that the waste was rendered insignificant as a hazard to human health and safety, livestock, and wildlife. Seven facilities applied for and were granted nonhazardous waste classification letters by the Department of Health (and later DTSC), so long as they continued to use fixation technologies for metal shredder residue. The authority was issued under CCR Title 22 Section 66260.200(f), and the authorization is known as an (f) letter. Metal shredding activities at the site are covered under an (f) letter

authorization, which was issued to Hugo Neu-Proler and transferred to SA Recycling when they took over operations in 2007. The CTMSR is disposed of or used as daily cover at Class III landfills as non-hazardous waste.

The following industrial materials are listed in the site Stormwater Pollution Prevention Plan (SWPPP).

- Ferrous and non-ferrous scrap metal
- Diesel fuel
- Gasoline fuel
- Hydraulic oil
- Waste oil
- Non-RCRA hazardous waste (oily absorbent, anti-freeze, etc.
- Lead-acid batteries
- polychlorinated biphenyls (PCB) capacitors
- PCB ballasts
- Alkaline batteries
- Waste coolant
- Lubricating oil
- Spent dust collector filters
- Sodium hydroxide (25%)

Materials managed for off-site removal by recycling or waste disposal by SAR are:

- Unleaded gasoline and diesel fuel;
- Used anti-freeze and used oil;
- Sweepings;
- Stormwater sediment;
- Sodium hydroxide solids;
- Oily water;
- Oily absorbent/debris/dirt;
- Spent Air Pollution Control System Filters;
- Treated MSR;
- Waste oil;
- Lead-acid batteries;
- PCB capacitors;
- PCB ballasts; and
- Alkaline batteries

The Applicant and DTSC entered into a Consent Order, Docket No. HWCA 20187418, issued on December 12, 2023. The Consent Order alleges violations to the health and safety code (HSC) observed at the project site by DTSC. Alleged violations were documented both on- and off-site. Compliance requirements are outlined in the Consent Order, which include already implemented corrective actions and future corrective actions related to all alleged violations. Alleged offsite violations have been addressed by investigation and cleanup/removal of offsite CTMSR. Continuing evaluation and cleanup of any offsite releases will occur as described in plans prepared and submitted to DTSC. The Applicant has come into compliance with some of the alleged violations, and has agreed to come into compliance with all alleged violations and provide DTSC with evidence of changes within the schedule outlined in the Consent Order.

2.4.7 CEQA BASELINE

CEQA provides for an SEIR to assess the significance of a project's impacts in comparison to a baseline that consists of the existing physical environment conditions at and near the Project site. Baseline conditions are normally measured at the time of the commencement of environmental review of the Proposed Project. State 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 of 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 determine whether an impact is significant.*

Courts have recognized that there may be instances in which conditions existing at the time of the Notice of Preparation (NOP) do not accurately represent existing conditions. The courts have reasoned that by using the qualifying term "normally," the Guidelines recognize that in appropriate situations a lead agency has discretion in representing the baseline.

Table 2-1 shows a comparison of the 1996 Certified EIR assumption for the Proposed Project operation versus the existing operations in Fiscal Year 2021/2022. This table is included to reflect the conservative nature of the SEIR's baseline assumptions to reflect the throughput volumes that were subject to substantiation leading up to preparation and release of the NOP, as opposed to the maximum tonnage referenced in the 1996 Certified EIR. Operations under the Proposed Project are anticipated to continue to be at the baseline Fiscal Year 2021/2022 level.

Throughput volumes in 2018 and 2019 were approximately 840,000 gross tons. In 2020, throughput volumes increased to approximately 1 million gross tons, and in FY 21/22 throughput volumes were approximately of 1.2 million gross tons.

Table 2-1. 1996 Approved Project as Compared to Fiscal Year 2021/2022 Operations

	1996 Approved Project[1]	Fiscal Year 21/22 Operations[2]
Gross Annual Throughput	1.3 million gross tons	1.2 million gross tons
Daily Transactions (or Deliveries)	300	280
Employees	164	140
Daily Employee Trips (inbound and outbound)	328	280
Daily Deliveries by Truck/Service/Vendors	15	15
Rail Cars Delivered per Day (for recycling)	13	3
Vessel Calls per Year	41	28
Other Truck Trips (ex. Non-Ferrous Containers)	3-4	3-4

Sources:

1 Section 1.5.2, Proposed Changes to Processing Units and Facilities, Certified EIR, 1996.

2 SA Recycling, pers. comm. 2022

Therefore, for purposes of this Draft SEIR, conditions that occurred from July 1st, 2021, through June 30th, 2022 (FY 21/22) are considered to be the baseline throughput for evaluation herein and FY 21/22 throughput levels are anticipated to be maintained during the 10-year extension of existing operations (to 2034).

2.5 Proposed Project Elements

The Proposed Project seeks an amendment to Permit No. 750 to allow for an up to 10-year extension, to the current Permit, which currently expires in 2024. The term extension will allow continued operation of the site as a scrap metal recycling facility with no changes to the scope of the Permit, use of the Proposed Project site, or new construction or operations, other than routine maintenance or replacement of equipment. Operations at the site would conclude at the end of year 10 pursuant to the terms of the Permit. Up to an additional 5-years will be granted to allow for any required removal of equipment, demolition of the existing landside structures on the project site, any necessary remediation of the Project site to the satisfy LAHD and regulatory requirements and post remedial activities to restore the premises per the terms of the Permit. No recycling operations outside of those required for restoration of the site will occur during this up to 5-year term.

2.5.1 PROJECT COMPONENTS

Project activities would be broken down into two phases as follows: (1) Continued Operation for up to 10 years, and (2) Non-operational Restoration Period for up to 5 years.

Phase 1: Continued Operation

For the first up to 10 years of the permit's extension, the site would continue to be used as a scrap metal recycling facility with no changes to the scope of the permit, use of the Proposed Project site, nor new construction or operations, other than routine maintenance or replacement of equipment. The existing and ongoing monitoring and reporting of groundwater and free product recovery of the 1988 diesel fuel release would continue, and no changes are proposed. The Proposed Project analyzed in 1996 assumed up to 1.3 million gross tons of throughput, 300 transactions (or deliveries) per day and 164 employees. Operations in FY 21/22 were approximately 1.2 million gross tons of throughput, 280 transactions (or deliveries) per day and 140 employees. The site would be open to receive material Monday through Friday from 6:00 a.m. to 6:00 p.m. and on Saturday from 6:00 a.m. to 3:00 p.m. (see Table 2-2). Operations may occur 24 hours a day during operational days. No operational changes or increases from FY 21/22 levels are proposed for the 10 years of continued operation.

Table 2-2. SA Recycling Operations

Site Schedule	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Site Materials received	6:00 a.m.-6:00 p.m.	6:00 a.m.-6:00 p.m.	6:00 a.m.-6:00 p.m.	6:00 a.m.-6:00 p.m.	6:00 a.m.-6:00 p.m.	11:00 a.m.-3:00 p.m.	Closed
Shredder Operation	8:00 p.m.-3:00 a.m.	8:00 p.m.-3:00 a.m.	8:00 p.m.-3:00 a.m.	8:00 p.m.-3:00 a.m.	8:00 p.m.-3:00 a.m.	Occasional*	Occasional*

Note:
* On occasions the shredder runs from 3:00 p.m. to 1:00 a.m. on Saturdays or on rare occasions for ship loading on Sundays.

Phase 2: Non-operational Restoration Period

The following wind down activities would occur during the Non-operational Restoration Period, which could last for up to 5 years:

Subphase 2.1: Truck Scales Closure

The truck scales would close and no additional material would be received by the facility.

Subphase 2.2: Demolition/Dismantling of Structures/Buildings

Dismantling of the facility structures would be performed in sequential order. Table 2-3 below shows the estimated weight of steel at each structure.

Table 2-3. Weight of Recyclable Steel for Each Department - Metal Scrap Weight

Department	lbs	Tons
Shredder (APCS included)	2,627,206	1,314
MRP	7,224,817	3,612
Shear	741,000	371
Warehouse	200,000	100
Maintenance Shop	120,000	60
Total	**10,913,023**	**5,457**

The timeline for this phase is approximately 120 days based on the amount of material that is present in each structure. The structures would be dismantled by demolition crews utilizing manlifts and mobile cranes. Once the steel is placed on the ground it would be sized down by a mobile shear and stockpiled. Then, a stationary guillotine shear would process the stockpiled steel and prepare the steel for bulk sale. All intermediate handling/movement of the steel would be completed with material handlers equipped with a grapple attachment.

Subphase 2.3: Shipping (Bulk Sale)

Recycled metals from the wind down activities would be sold and shipped out through a dry bulk vessel. With an estimated volume of 5,500 tons of scrap metal, the vessel load out would be completed with one vessel call which can be accomplished in one working day notwithstanding equipment or weather delays.

The material (scrap metal) would be transferred from stockpiles to a haul truck by material handlers with a grapple attachment. The haul truck would transfer/dump the material into a skip pan then transfer/load the scrap metal onto a dry bulk vessel by the on-site electric harbor crane. This sequence would repeat until all scrap metal has been loaded on the vessel.

Subphase 2.4A-1: Concrete Demolition – Flat Slab Concrete

A flat concrete slab encompasses almost the entirety of the property and consists of 16 inches (average) of fiber reinforced concrete. The slab would be removed using an excavator with a hydraulic concrete breaker attachment. The broken concrete would be stockpiled by a front wheel loader and later processed through a mobile concrete crusher.

The timing of this operation would be optimized to reduce dust and engine emissions. To accomplish this goal, concrete breaking operations would be conducted 5 days per week from 7 a.m. to 6 p.m. The concrete would be stockpiled throughout the week and the concrete crusher is anticipated to run only 2 days per week.

Dust control systems and all permits for the concrete crusher would be provided by a local construction company that will be contracted to operate the crusher. A separate water truck will be utilized for dust control during the breaking of the concrete slab. This Subphase would occur over an approximately 90-day period.

Subphase 2.4A-2: Concrete Demolition – Foundations

A separate phase would be required for the removal of structural foundations due to the differences entailed in their demolition. Concrete foundations consist of rebar reinforced concrete that requires a different set of equipment and procedures. The concrete would be broken utilizing the same concrete breaker as Subphase 2.4A-1 and the rebar would be separated and cut with the mobile shear as needed. Broken concrete would be stockpiled and processed through the concrete crusher. To accomplish this goal, concrete breaking operations would be conducted 5 days per week from 7 a.m. to 6 p.m.

This Subphase would occur over an approximately 90-day period. The amount of concrete that would be crushed is estimated based on existing drawings of all structures, foundations, and concrete slab as shown in Table 2-4 below.

Table 2-4. Estimated Total Volume of Concrete to be Removed

Concrete Structure	Total Volume (cu-yd)
Concrete Slab	48,000
Foundations	20,000
Total (Approx.)	68,000

Subphase 2.4B-1: Soil Removal

Any soil that is categorized as hazardous (contaminated) through testing would be transferred to a landfill licensed to accept hazardous waste. It is estimated that a worse-case scenario of 10,000 yards (20%) of soil would be contaminated, and 40,000 yards (80%) would not be contaminated. Under a worst-case scenario, a total of 1,000 truckloads of contaminated soil would be transported to Kettleman Hills Hazardous Waste Facility, in Kettleman City, California, for disposal. Some of the non-contaminated soil may not be suitable for future reuse on site. If necessary, up to 4,000 truckloads of non-hazardous soil would be transported to Simi Valley Landfill and Recycling Center, in Simi Valley, California. This would be accomplished by utilizing a bulldozer to move the soil to a stockpile where a front wheel loader would transfer it to dump trucks. A water truck would be used for dust control during this phase.

Subphase 2.4B-2: Soil Import and Regrading

Replacement soil equal to the amount of soil being removed would be hauled in as space becomes available. All imported soil would meet LAHD's Environmental Guidance for Industrial Fill Material and be approved by LAHD prior to bringing to property. Outbound haul trucks from Phase 2.4B-1 would be loaded with clean fill soil on their return trip to the facility. It is estimated that 80% of the clean soil/fill would be imported in this manner. The soil would be compacted and roughly graded using a motor grader and bulldozer. A water truck would be used for dust control during this phase.

This subphase of 2.4B-1, and 2.4B-2 would last approximately 240 days.

Phase 2.4C: Haul Residual Crushed Concrete

Based on the estimated volume of concrete present at the facility (68,000 yd) and assuming that none of the crushed concrete remains on site, 6,800 concrete dump trucks would be sent to a construction and demolition debris (CND) recycling facility. Assuming the concrete is free of any contamination, the

final destination of residual crushed concrete would likely be sent to Maitri Road Recycling located in Corona, California.

This subphase would last approximately 68 days.

Phase 2.4D: Haul Suitable Cover to Site

In order to prevent fugitive dust after site wind down, it is estimated that approximately 11,000 cubic yards of suitable ground cover (i.e., gravel, crushed aggregate base, etc.) would be required. This would require approximately 5,100 trucks to bring new material to the site.

This subphase would last approximately 68 days.

2.6 Relationship to Existing Statutes, Plans, Policies, and Other Regulatory Requirements

One of the primary purposes of the LAHD approval processes is to ensure that the Proposed Project is consistent with applicable statutes, plans, policies, and other regulatory requirements. Table 2-5 lists the statutes, plans, policies and other regulatory requirements, including environmental review and consultation requirements required by federal, state, or local laws, regulations or policies, applicable to the Proposed Project. Additional analysis of the plan consistency is contained in the individual resources' sections of Chapter 3 of this Draft SEIR.

Table 2-5. Statutes, Plans, Policies, and Other Regulatory Requirements

Act/Plan/Policy	Description
California Coastal Act of 1976	The California Coastal Act (20 Public Resources Code (PRC) 30700 et seq.) identifies the Port and its facilities as "one of the state's primary economic and coastal resources and.. .an essential element of the national maritime industry" (PRC Section 30701). LAHD is responsible for the modernizing and construction of necessary facilities to accommodate deep-draft vessels and to accommodate the demands of foreign and domestic waterborne commerce and other traditional and water-dependent and related facilities in order to preclude the necessity for developing new ports elsewhere in the state (Sections 30007.5 and 30701 [b]). The act also establishes that the highest priority for any water or land area use within LAHD's jurisdiction will be for developments that are completely dependent on such harbor water areas and/or harbor land areas for their operations (Sections 30001.5[d], 30255, and 31260). The act further provides that LAHD should "[g]ive highest priority to the use of existing land space within harbors for port purposes, including, but not limited to, navigational facilities, shipping industries, and necessary support and access facilities" (Section 30708 [c]). Under the California Coastal Act, water areas may be diked, filled, or dredged when consistent with a certified PMP only for specific purposes, including: (1) construction, deepening, widening, lengthening, or maintenance of ship channel approaches, ship channels, turning basins, berthing areas, and facilities that are required for the safety and the accommodation of commerce and vessels to be served by port facilities; and (2) new or expanded facilities or waterfront land for port-related facilities. In accordance with provisions of the California Coastal Act, LAHD has a certified master plan that provides LAHD with coastal development permit authority for actions/developments consistent with that master plan. Inconsistent items, such as new fills in water, would require a master plan amendment through the CCC. The Proposed Project would be consistent with the master plan's provisions.

Table 2-5. Statutes, Plans, Policies, and Other Regulatory Requirements

Act/Plan/Policy	Description
Coastal Zone Management Act (CZMA)	Section 307 of the federal CZMA requires that all federal agencies with activities directly affecting the coastal zone, or with development projects within that zone, comply with the state coastal acts (in this case, the California Coastal Act of 1976) to ensure that those activities or projects are consistent to the maximum extent practicable. The CCC will use this EIR when considering whether to find the Proposed Project consistent with the California Coastal Act, and agencies will use that approval as a demonstration that the Proposed Project would be in compliance with the CZMA.
Port Master Plan (PMP)	In August 2013. the LAHD Board approved an update to the PMP, which it intends to serve as a long-range plan to establish policies and guidelines for future use of Port lands within the coastal zone, as required under the California Coastal Act. The Project site is in Planning Area 3 of the updated PMP: Terminal Island, According to the PMP, Planning Area 3 designates the Project site for container/dry bulk uses. The Proposed Project would be consistent with the updated PMP.
California Coastal Plan	Under provisions of the California Coastal Act, the PMP is incorporated into the City's Local Coastal Program. LAHD has coastal development permit authority for activities throughout the Port. Therefore, if the Proposed Project would be consistent with the PMP, the Proposed Project would also be considered consistent with the Local Coastal Program.
California Tidelands Trust Act, 1911	Submerged lands and tidelands within the Port, which are under the Common Law Public Trust, were legislatively granted to the City pursuant to Chapter 656, Statutes of 1911, as amended. Those properties are held in trust by the City and administered by LAHD to promote and develop commerce, navigation, fisheries, and other uses of statewide interest and benefit, including commercial, industrial, and transportation uses; public buildings and public recreational facilities; wildlife habitat; and open space. LAHD would fund the Proposed Project with trust revenues. All property and improvements included in the Proposed Project would be dedicated to maritime-related uses; therefore, the Proposed Project would be consistent with the trust.
San Pedro Bay Ports Clean Air Action Plan (CAAP)	LAHD, in conjunction with the Port of Long Beach and with guidance from (SCAQMD, CARB, and U.S. Environmental Protection Agency, has developed the CAAP, which was approved by the Los Angeles and Long Beach Boards of Harbor Commissioners on November 20, 2006. The CAAP focuses on reducing diesel PM, NO_X, and SO_X, with two main goals: (1) to reduce Port-related air emissions in the interest of public health; and (2) to disconnect cargo growth from emissions increases. The 2010 CAAP Update (adopted by the Board on November 22, 2010). includes near-term measures implemented largely through the CEQA/NEPA process and new leases at both ports, and includes new, far-reaching goals for curbing port-related air pollution over the next decade. The Proposed Project includes air quality control measures outlined in the 2010 CAAP Update, both as mitigation that would be imposed via a lease amendment and as standard measures that would be implemented through agreements with other agencies and business entities, and LAHD contracting policies.
Port Strategic Plan Update	The updated Port Of Los Angeles Strategic Plan 2012-2017, 2014 Update (LAHD 2014) serves to align the broad spectrum of activities of the Port with a focused vision - embracing a new economic era and remaining the leading container port in the nation. The Plan provides the high-level areas of focus, with which divisions and staff align their activities, and serves as the roadmap to ensure that the Port remains competitive over the coming years, aptly and proactively meeting the needs of a new era of international trade. The updated Strategic Plan for the Port includes an objective to facilitate an efficient, secure, and environmentally sustainable supply chain. To this effect. the Strategic Plan update includes Initiative 2 to strengthen Port security. Under Initiative 2, the Port would implement security and public safety strategies that support goods movement and mitigate risk. Metrics for this Initiative include: a. Number of vessel and terminal safety inspections b. Number and effectiveness of joint preparedness exercises

Table 2-5. Statutes, Plans, Policies, and Other Regulatory Requirements

Act/Plan/Policy	Description
	The modem goods movement environment requires that ports be prepared for a variety of incidents, from natural disasters to potential acts of terror. The Harbor Department has committed to the following: • Reduce risks of interruptions to goods movement through regular inspections of facilities. • Prevent incidents and improve responses to incidents by holding joint preparedness exercises with supply chain partners for a variety of potential incidents (e.g., active shooter, hazmat release, seismic events, etc.). • Track the effectiveness of these joint exercises in order to measure the success of the strategies - to be better prepared for an actual incident.
Port Risk Management Plan (RMP)	The Port RMP, an amendment to the PMP, was adopted in 1983, in accordance with requirements of CCC. The purpose of the Port RMP is to provide siting criteria relative to vulnerable resources and the handling and storage of potentially hazardous cargo such as crude oil, petroleum products, and chemicals. The plan provides guidance for future development of the Port to minimize or eliminate the hazards to vulnerable resources from accidental releases (Los Angeles Harbor Department 1983). As part of the PMP Update in 2013, the Port updated and incorporated the RMP as Chapter 8 of the PMP.
Port of Los Angeles and Long Beach, Water Resources Action Plan (WRAP)	The WRAP is a plan to protect and improve water and sediment quality in the San Pedro Bay. The WRAP establishes programs and water quality improvement measures necessary to achieve the goals and targets established by the Regional Water Quality Control Board (RWQCB). The plan targets four basic types of potential sources of pollutants to harbor waters: Land Use Discharges, On-Water Discharges, Sediments, and Watershed Discharges. The Proposed Project would not include clean-up dredging and would help improve sediment quality in the bay by removing and properly treating or disposing of any contaminated material.
City of Los Angeles: Port of Los Angeles Plan	The Port of Los Angeles plan is one of 35 community plans that make up the General Plan of the City of Los Angeles (City of Los Angeles 1982). This plan provides a 20-year official guide to the continued development and operation of the Port. It is designed to be consistent with the PMP discussed above. The Proposed Project would be consistent with allowable land uses and the goals and policies of the General Plan-Port of Los Angeles Plan.
City of Los Angeles: San Pedro Community Plan	The San Pedro Community plan (City of Los Angeles1999) serves as a basis for future development of the community. It is also the land use plan portion of the City's Local Coastal Program for San Pedro. The Port is not part of the San Pedro Community Plan area. However, the San Pedro Community Plan does make recommendations regarding the Port, particularly for areas adjacent to commercial and residential areas of San Pedro. The Proposed Project would be consistent with these recommendations, as LAHD has taken into consideration the residential and commercial communities of San Pedro during Proposed Project development through the scoping process.
City of Los Angeles General Plan: Air Quality Element	The City of Los Angeles General Plan has an Air Quality Element (City of Los Angeles1992) that contains general goals, objectives, and policies related to improving air quality in the region. Policy 5.1.1 relates directly to the Port and requires improvements in harbor operations and facilities to reduce emissions. LAHD is actively planning for and implementing such improvements. The Proposed Project would be consistent with the Air Quality Element in that they would incorporate CAAP measures to reduce air quality impacts.
Water Quality Control Plan: Los Angeles River Basin	The Water Quality Control Plan for the Los Angeles River Basin (Region 4) (Basin Plan) was adopted by the LARWQCB in 1978 and updated in 1994 (RWQCB 1994), with amendments through October 2014. The Proposed Project would not affect waste discharges or changes to beneficial uses, and would be consistent with the Basin Plan.
Water Quality Control Policy: Enclosed Bays	In 1974, the SWRCB adopted a water quality control policy that provides principles and guidelines to prevent degradation and to protect the beneficial uses of waters of enclosed bays and estuaries. Los Angeles Harbor is considered to be an enclosed bay under this policy. The

Table 2-5. Statutes, Plans, Policies, and Other Regulatory Requirements

Act/Plan/Policy	Description
and Estuaries of California	policy addresses activities such as the discharge of effluent, thermal wastes, radiological waste, dredge materials, and other materials that adversely affect beneficial uses of the bay and estuarine waters. Among other requirements, waste discharge requirements developed by the RWQCB must be consistent with this policy. The Proposed Project would be operated in conformance with objectives of the water quality control policy through controls on operations (stormwater and other discharges) and during restoration.
Air Quality Management Plan	The federal Clean Air Act (CAA) and its subsequent amendments establish the National Ambient Air Quality Standards (NAAQS) and delegate the enforcement of these standards to the states. In areas that exceed the NAAQS, the CAA requires states to prepare a State Implementation Plan that details how the NAAQS would be met within mandated timeframes. The CAA identifies emission reduction goals and compliance dates based on the severity of the ambient air quality standard violation within an area. The California Clean Air Act (CCAA) outlines a program to attain the California Ambient Air Quality Standards (CAAQS) for ozone, nitrogen dioxide, sulfur dioxide, and carbon monoxide by the earliest practical date. The Lewis Air Quality Act of 1976 established the SCAQMD, created SCAQMD's jurisdiction over the four-county South Coast Air Basin, and mandated a planning process requiring preparation of an air quality management plan (AQMP). The Final 2012 AQMP was adopted by the AQMD Governing Board on December 7, 2012 (SCAQMD 2013). In addition, the AQMD Governing Board adopted a Clean Air Plan Amendment to include control measure IND-01 in the Final 2012 AQMP at the February 1, 2013, Governing Board meeting. The AQMD asserts that Control Measure IND-01 would ensure that the Ports of Los Angeles and Long Beach meet their voluntary commitments to reducing air pollution from port-related sources. The AQMD states that this represents a backstop measure to enforce emission reduction goals that the Ports voluntarily adopted in the clean Air Action Plan by 2015. The AQMD asserts that, under control measure IND-01, any additional port emission reductions must be technically feasible, cost-effective, and within the legal authority of the Ports. LAHD provided cargo forecasts that were used by the Southern California Association of Governments (SCAG) to simulate future growth and emission scenarios in the 2012 AQMP. These cargo forecasts include the operational activities associated with the handling of dry bulk cargo. As a result, activities associated with the Proposed Project would not exceed the future emission growth projections in the 2012 AQMP. The most recent 2016 AQMP was adopted and submitted to the Environmental Protection Agency in March 2017. The 2016 AQMP focuses on a comprehensive and integrated plan primarily focused on addressing the ozone standards. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories. Construction and operational activities associated with the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan.
California Air Resources Board: Emission Reduction Plan for Ports and Goods Movement	CARB approved the Emission Reduction Plan for Ports and Goods Movement (CARB 2006) on April 20, 2006, and a Goods Movement Action Plan in January 2007. Many of the proposed air quality mitigation measures in this Draft EIR were developed as part of the CAAP (Port of Los Angeles and Port of Long Beach 2006). Therefore, LAHD's air quality plan complies with CARB's goals and meets and/or exceeds all reduction strategies. .
AB 32	On September 27, 2006, the Governor of California signed AB 32, the Global Warming Solutions Act. AB 32 caps California's greenhouse gas (GHG) emissions at 1990 levels by 2020. This legislation represents the first enforceable statewide program in the United States to cap all GHG emissions from major industries that includes penalties for noncompliance. It requires GARB to

Table 2-5. Statutes, Plans, Policies, and Other Regulatory Requirements

Act/Plan/Policy	Description
	establish a program for statewide GHG emissions reporting and to monitor and enforce compliance with this program. The Proposed Project or an alternative would be required to comply with Port requirements, such as the CAAP, to reduce air emissions, The Proposed Project would thereby implement energy and emission reduction requirements in compliance with GHG emission reduction strategies and would thus be in compliance with AB 32.
Southern California Association of Governments (SCAG) Regional Plans	SCAG is responsible for developing regional plans for transportation management, growth, and land use, as well as developing the growth factors used in forecasting air emissions within the South Coast Air Basin. SCAG has developed a Growth Management Plan, a Regional Housing Needs Assessment, a Regional Mobility plan, and, in cooperation with the SCAQMD, the AQMPs. The Proposed Project would not generate a measurable change in population distribution, nor would it result in a change to housing demand on a regional or local scale. It would fit within population and housing projections for the local area and region as a whole and thus would be consistent with these plans.
Congestion Management Program (CMP)	The CMP is a state-mandated program intended as the analytical basis for transportation decisions made through the State Transportation Improvement Program process (Los Angeles County Metropolitan Transportation Authority 2010). The CMP was developed to: (1) link land use, transportation, and air quality decisions; (2) develop a partnership among transportation decision makers on devising appropriate transportation solutions that include all modes of travel; and (3) propose transportation projects that are eligible to compete for state gas tax funds. The CMP includes a Land Use Analysis Program, which requires local jurisdictions to analyze the impacts of land use decisions on the regional transportation system. For development projects, an EIR is required based on local determination and must incorporate a transportation impact analysis into the EIR. The Revised NOP determined that potential traffic impacts for the Proposed Project would not significantly affect CMP highways, and thus the Proposed Project is consistent with the CMP.
Water Resource Regulations	The Rivers and Harbors Act of 1899, Section 10 (33 United States Code [USC] 403); federal Water Pollution Control Act (as amended by the Clean Water Act of 1977), Section 401 and 402 (33 USC 1341 and 1342); Marine Protection, Research, and Sanctuaries Act of 1972, Section 103 (33 USC 1413); California Hazardous Waste Control Act; SWQCB, Enclosed Bays and Estuaries Plan; and Water Quality Control Plan for the Los Angeles River Basin (Region 4B), adopted by the RWQCB, Los Angeles Region. The Revised NOP evaluated potential impacts to water quality, including the federal water resources regulations associated with the Proposed Project; therefore, the Proposed Project would be consistent with water resource laws, regulations, and plans.
Air Quality Regulations	CAA, Title 40 CFR Parts 50 and 51 as amended; Titles 40 CFR Part 51.24 and 40 CFR Part 52.21 ; CCAA; AQMP of the City of Los Angeles General plan, Air Quality Element; and SCAQMD Regulations X111 and XV, New Source Review and Rules 212, 401, 403, and 431.2. Refer to Section 3.1, Air Quality and Meteorology, of this Draft SEIR for a discussion of applicable air quality laws, regulations, and plans.
Biological Resources Protection	Endangered Species Act of 1973, as amended; Marine Mammal Protection Act; Migratory Bird Conservation Act; Section 103 of the Marine Protection, Research, and Sanctuaries Act of 1972; California Endangered Species Act; Section 302 of the Marine Protection, Research, and Sanctuaries Act of 1972; U.S. Fish and Wildlife Act of 1956 (16 USC 742a *et seq.*); Fish and Wildlife Coordination Act (16 USC 661 *et seq.*); Magnuson-Stevens Fishery Conservation and Management Act, as amended; Executive Order 13112, Invasive Species; Nonindigenous Aquatic Nuisance Prevention and Control Act of 1990 (P.L 01-646), as amended by the National Invasive Species Act of 1996; Ballast Water Management for Control of Nonindigenous Species Act of 1999 (PRC Sections 71200–71271); and federal Water Pollution Control Act (as amended by the Clean Water Act of 1977). The IS/NOP for the Proposed Project (Appendix A), determined that implementation of the Proposed Project would not create any new significant impacts or

Table 2-5. Statutes, Plans, Policies, and Other Regulatory Requirements

Act/Plan/Policy	Description
	substantially more severe impacts than previously analyzed in regard to compliance with the applicable laws and regulations protecting biological and marine resources.
Cultural Resources Protection	Section 106 of the National Historic Preservation Act of 1966, as amended, and Corps implementing regulations (36 CFR 800; 33 CFR 325, Appendix C); the Archaeological and Historical Preservation Act and Executive Order 11593 "Protection and Enhancement of the Cultural Environment." Section 3.2 of this Draft SEIR) determined that the Proposed Project would not affect cultural resources listed or eligible for listing on the National Register of Historic places. Therefore, compliance with federal laws, regulations, and other guidelines has occurred

2.7 Other Public Agencies Whose Approval May be Required for Operations at the Site

- SCAQMD: permits for on-site stationary equipment
- SWRCB: approval of Construction General Permit

Chapter 3

Environmental Impact Analysis

3.0-1 Introduction

This section serves as an introduction to Chapter 3 and presents an overview of the approach and principles that guide the evaluation of potential environmental impacts in this Draft Subsequent Environmental Impact Statement (SEIR). Sections 3.1 through 3.5 present the affected environment and environmental consequences of the SA Recycling Amendment to Permit No. 750 Project (Proposed Project) for each environmental issue, as described in Chapter 2, Project Description, of this Draft SEIR.

Sections 3.1 through 3.5 each present the following information for the respective resource areas:

- A description of the existing setting (the physical conditions that currently exist).
- A discussion of regulations and policies that are applicable to the Proposed Project.
- A discussion of the impact analysis methodology and significance criteria (i.e., the criteria against which the significance of impacts is judged).
- A summary of the findings of the 1996 Final Environmental Impact Report for the Hugo Neu-Proler Lease Renewal Project (SCH No. 93071074) (see the 1996 Certified EIR discussion in Chapter 2, Project Description).
- If any new or substantially more severe significant impacts would occur with implementation of the Proposed Project and mitigation measures to reduce or avoid any new or substantially more severe significant impacts identified
- Residual impacts

Significant cumulative impacts to which the Proposed Project would contribute are summarized in Chapter 4, Cumulative Analysis.

3.0-2 Terminology Used in this Environmental Analysis

In evaluating the potential impacts of the Proposed Project, the level of significance is determined by applying the threshold of significance (significance criteria) for each resource evaluation area. The following terms are used in the impact analysis for each resource area.

- *No New Impact:* No adverse changes in the environment are expected.
- *Less-than-Significant Impact:* The Proposed Project would cause no new or substantially more severe significant impacts beyond what was previously analyzed (i.e., the impact would not exceed thresholds of significance).
- *New Significant Impact:* The Proposed Project would create a new potential impact or a substantially more severe impact beyond what was previously analyzed causing an adverse change in physical conditions within the Project area. Impacts would exceed the applicable significance threshold established by CEQA, but may be reduced to less than significant by the application of applicable mitigation measures.
- *Significant Unavoidable Impact:* A residual impact that would cause a new substantial adverse effect on the environment that could not be reduced to a less-than-significant level by feasible mitigation.
- *Mitigation:* This term refers to measures that would be implemented to avoid or lessen potentially significant impacts. Mitigation includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action
- Compensating for the impact by replacing or providing substitute resources or environments.

The mitigation measures would be proposed for implementation as conditions of Project approval and would be monitored to ensure compliance and implementation.

- *Residual Impact*: This is the level of impact after the implementation of mitigation measures.

Section 3.1

Air Quality and Meteorology

Summary of Section

This section of the Draft Subsequent Environmental Impact Report (Draft SEIR) assesses whether activities associated with the Proposed Project may impact air quality or expose individuals to unacceptable levels of health risk. This section includes the following:

- A description of the existing air quality and meteorology within the Port of Los Angeles (Port or POLA)
- A discussion of regulations and policies regarding air quality that are applicable to the Proposed Project
- A discussion of the analysis methodology
- A summary of 1996 Certified Environmental Impact Report (EIR) (1996 Certified EIR) findings;
- Potential impacts to air quality and human health risk associated with Proposed Project activities
- A description of mitigation measures proposed to reduce significant impacts, as applicable
- Residual impacts after mitigation and significance under the California Environmental Quality Act (CEQA)

Key Points

Proposed Project emissions and associated impacts on air quality and human health would be considerably lower than impacts identified in the 1996 Certified EIR.

Proposed Project emissions and associated impacts on air quality and human health would be less than South Coast Air Quality Management District (SCAQMD) CEQA thresholds for all pollutants.

Proposed Project emissions would be less than the CEQA Baseline.

Mitigation measures would not be required.

The Proposed Project would not result in new significant impact or more substantially severe impacts to air quality and health risk than previously analyzed.

The Proposed Project would not result in any new significant and unavoidable impacts to air quality and health risk.

3.1.1 INTRODUCTION

Chapter 2, Project Description, describes in detail activities associated with the Proposed Project. In summary, the Proposed Project seeks to amend Permit No. 750 to allow for an extension of the facility lease by up to 10 years, during which time Phase 1 - Continued Operation would continue without change to existing activities and throughput would remain at 1.2 million tons. At the end of the 10-year period, the facility would be decommissioned and restored during the Phase 2 - Non-operational Restoration Period. Phase 1 and Phase 2 activities are described in this section as they relate to air quality and health risk.

Emissions from Phase 1 and Phase 2 would affect air quality in the immediate Proposed Project area and the surrounding region. This section describes the existing environmental and regulatory setting for air quality, potential impacts of the Proposed Project, and mitigation measures that would reduce impacts, where feasible and appropriate.

3.1.2 ENVIRONMENTAL SETTING

The Proposed Project site is in the Harbor District of the City of Los Angeles, within the South Coast Air Basin (SCAB). The SCAB consists of the non-desert portions of Los Angeles, Riverside, and San Bernadino Counties and all of Orange County, and the adjacent offshore waters, shown in Figure 3.1-1. The air basin covers an area of approximately 6,000 square miles and is bounded on the west by the Pacific Ocean; on the north and east by the San Gabriel, San Bernardino, and San Jacinto Mountains; and on the south by the San Diego County line. This section describes existing air quality in the Proposed Project study area within the SCAB. Meteorological conditions have not changed appreciably since the time of the 1995 Draft and 1996 Certified EIR and can be found in Section 3.3.1.1 of the 1995 Draft EIR.

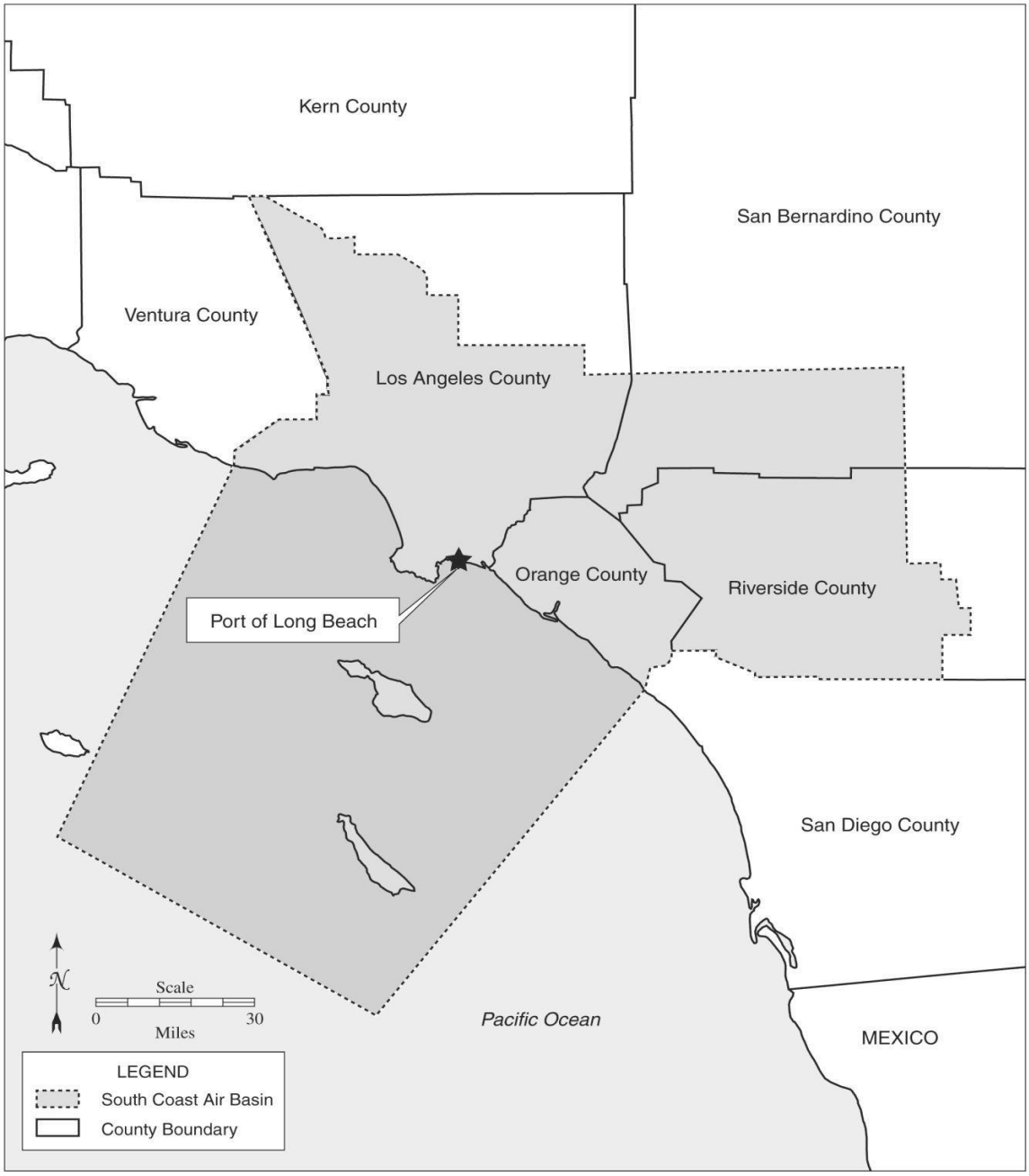

Figure 3.1-1. South Coast Air Basin

3.1.2.1 Criteria Pollutants

Criteria pollutants are pollutants for which the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have set health- and welfare-protective National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively. These pollutants are ozone (O_3), particulate matter less than 10 microns in diameter (PM_{10}), particulate matter less than 2.5 microns in diameter ($PM_{2.5}$), carbon monoxide (CO), nitrogen dioxide (NO_2), and sulfur dioxide (SO_2).

Air quality at a given location can be described by the concentrations of criteria air pollutants in the atmosphere near ground level. The significance of a pollutant concentration is determined by comparing it to an appropriate NAAQS and/or CAAQS. These standards represent the allowable atmospheric concentrations at which the public health and welfare are protected and include a reasonable margin of safety to protect the more sensitive individuals in the population.

Regional Air Quality

Environmental Protection Agency (EPA), CARB, and local air districts classify an area as attainment, unclassified, or nonattainment depending on whether the monitored ambient air quality data show compliance, lack of data, or noncompliance with the ambient air quality standards. The NAAQS and CAAQS are provided in Table 3.1-1. Table 3.1-2 summarizes the federal and state attainment status of criteria pollutants in the SCAB based on the NAAQS and CAAQS.

Table 3.1-1. National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards	Health Effects
O3	1-hour	0.09 ppm	–	Breathing difficulties, lung tissue damage
	8-hour a	0.070 ppm	0.070 ppm	
PM10	24-hour	50 µg/m3	150 µg/m3	Increased respiratory disease, lung damage, cancer, premature death
	Annual	20 µg/m3	–	
PM2.5	24-hour b	–	35 µg/m3	Increased respiratory disease, lung damage, cancer, premature death
	Annual	12 µg/m3	12 µg/m3	
CO	1-hour	20 ppm	35 ppm	Chest pain in heart patients, headaches, reduced mental alertness
	8-hour	9.0 ppm	9 ppm	
NO2	1-hour	0.18 ppm	0.100 ppm c	Lung irritation and damage
	Annual	0.030 ppm	0.053 ppm	
SO2	1-hour	0.25 ppm	0.075 ppm c	Increases lung disease and breathing problems for asthmatics
	3-hour	–	0.5 ppm	
	24-hour	0.04 ppm	–	

Source: CARB 2020a.

Notes: O_3 = ozone; ppm = parts per million; "–" = no standards; PM_{10} = particulate matter less than 10 microns in diameter; µg/m^3 = micrograms per cubic meter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; CO = carbon monoxide; NO_2 = nitrogen dioxide.SO_2 = sulfur dioxide;

a The federal 8-hour O_3 standard is based on the annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years.

b The federal 24-hour $PM_{2.5}$ standard is based on the 3-year average of the 98th percentile of the daily values.

c The federal 1-hour NO_2 and SO_2 standards are based on the 3-year average of the 98th and 99th percentiles of the annual distribution of daily maximum values, respectively.

Table 3.1-2. SCAB Attainment Status

Pollutant	Attainment Status	
	Federal	*State*
O3	Extreme Nonattainment	Nonattainment
PM10	Maintenance	Nonattainment
PM2.5	Serious Nonattainment	Nonattainment
CO	Maintenance	Attainment
NO2	Maintenance	Attainment
SO2	Attainment	Attainment

Sources: EPA 2023; CARB 2020b.

Note: SCAB = South Coast Air Basin; O_3 = ozone; PM_{10} = particulate matter less than 10 microns in diameter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; CO = carbon monoxide; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.

Air quality within the SCAB has improved substantially since the inception of the SCAQMD air pollutant monitoring in 1976. This improvement is due primarily to the implementation of stationary source emission-reduction strategies by EPA, CARB, and SCAQMD and lower polluting on-road motor vehicles. This trend toward cleaner air has occurred despite continued population growth. For example, while the SCAB exceeded the 0.07 parts per million (ppm) national 8-hour O_3 standard on 233 days in 1977, the number of O_3 exceedance days was 130 in 2021 (CARB 2020a).

Of the six criteria pollutants with national and state standards, O_3 is unique because it is not directly emitted from project sources. Rather, O_3 is a secondary pollutant, formed from precursor pollutants volatile organic compounds (VOC) and nitrogen oxides (NO_x), which photochemically react to form O_3 in the presence of sunlight. As a result, unlike inert pollutants, O_3 levels usually peak several hours after the precursors are emitted and many miles downwind of the source.

Because of the complexity and uncertainty in predicting photochemical pollutant concentrations, O_3 impacts are indirectly addressed by comparing emissions of VOC and NO_x to daily emission thresholds set by SCAQMD, discussed in Section 3.1.5, Thresholds of Significance. Because many of the Proposed Project emission sources would be diesel-powered, diesel particulate matter (DPM) was also evaluated in this analysis. DPM is one of the components of ambient PM_{10} and $PM_{2.5}$; it is classified as a toxic air contaminant (TAC) by CARB. DPM is therefore evaluated both as a criteria pollutant (as a component of PM_{10} and $PM_{2.5}$) and as a TAC (for localized health impacts).

Local Air Quality

The Port began an air monitoring program in 2005 and currently operates several air monitoring stations that collect ambient air pollutant concentrations and meteorological information within the Port and surrounding communities. The station closest to the Proposed Project is the Port Source Dominated Station, located approximately 1 mile southwest of the Project site. However, since operation of this station was suspended in May 2021, the San Pedro Station, located just under 2 miles southwest of the site, was considered as the most representative of the Project vicinity. The San Pedro Station is adjacent to the Promenade walkway along Harbor Drive, near the intersection of Harbor Boulevard and West 3rd Street. The station is representative of the air quality in the residential areas of San Pedro.

Table 3.1-3 shows the maximum pollutant concentrations measured at the San Pedro Station over the most recent 3-year period available (POLA 2021, 2022, 2023). The table shows that air quality at the monitoring station exceeded the state 1-hour O_3 standard in 1 year, the PM_{10} state 24-hour standard in 2 of the 3 years, and the PM_{10} state annual standard in all 3 years. All other national and state standards were met during this 3-year monitoring period.

In addition, the most recent Air Quality Monitoring Program Report shows that although container throughput increased at the Port, air quality improved over the 18-year monitoring record for particulates and over the 15-year record for gaseous pollutants (POLA 2023a). In particular, annual $PM_{2.5}$ concentrations decreased by 57% on average across the monitoring stations. PM_{10} concentrations decreased by 22% at the Wilmington Station (i.e., the only station that routinely monitored PM_{10}). Annual average NO_2 and SO_2 concentrations also decreased, although the report did not call out the percent reduction for these pollutants. CO concentrations have been historically low and have demonstrated no discernible trend over the monitoring period of record. Finally, O_3 concentrations showed year-to-year variability with some years showing elevated concentrations, which often coincide to years of high wildfire activity.

Table 3.1-3. Maximum Pollutant Concentrations Measured at the San Pedro Monitoring Station

Pollutant	Averaging Period	National Standard	State Standard	Concentration Compared to CAAQS / Concentration Compared to NAAQS [a]		
				May 2020–April 2021	*May 2021–April 2022*	*May 2022–April 2023*
O_3 (ppm)	1-hour	–	0.09	–/**0.101**	–/0.065	–/0.09
	8-hour	0.07	0.07	0.058/0.067	0.055/0.060	0.056/0.071
CO (ppm)	1-hour	35	20	1.7/1.7	6.9/6.9	2.7/2.7
	8-hour	9	9	1.4/1.4	1.3/1.3	2.2/2.2
NO_2 (ppm)	1-hour	0.100	0.180	0.065/0.073	0.059/0.059	0.054/0.061
	Annual	0.053	0.03	0.016/0.016	0.012/0.012	0.011/0.011
SO_2 (ppm)	1-hour	0.075	0.25	0.027/0.024	0.013/0.006	0.007/0.014
	3-hour	0.500	–	0.009/–	0.006/–	0.004/–
	24-hour	–	0.04	–/0.006	–/0.004	–/0.004
PM_{10} (µg/m^3) [b]	24-hour	150	50	70.6/**70.6**	44.6/44.6	60.8/**60.8**
	Annual	–	20	–/**27.2**	–/**24.7**	–/**22.5**
$PM_{2.5}$ (µg/m^3)	24-hour	35	–	21.8/–	18.4/–	17.7/–
	Annual	12	12	6.7/6.7	5.3/5.3	4.7/4.7

Sources: POLA 2021, 2022a, 2023.

Notes: CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; O_3 = ozone; ppm = parts per million; "–" = no standards; CO = carbon monoxide; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter less than 10 microns in diameter; µg/m3 = micrograms per cubic meter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter.

[a] Exceedances of the standards are shown in bold. All reported values represent the highest recorded concentration during the year unless otherwise noted.

[b] PM_{10} is not monitored at the San Pedro Station. The PM_{10} concentrations in the table are from the Wilmington Community Station.

3.1.2.2 Toxic Air Contaminants

TACs are pollutants that may lead to serious illness or increased mortality even when present at relatively low concentrations. They are airborne compounds that are known or suspected to cause adverse human health effects after long-term (i.e., chronic) and/or short-term (i.e., acute) exposure. Cancer risk is associated with chronic exposure to some TACs, and noncancer health effects can result from either chronic or acute exposure to various TACs. Examples of TAC sources in the SCAB include diesel- and gasoline-powered internal combustion engines in mobile sources; industrial processes and stationary sources, such as dry cleaners, gasoline stations, and paint and solvent operations; and stationary fossil fuel-burning combustion sources, such as power plants.

TAC effects in the SCAB are characterized by SCAQMD's Multiple Air Toxics Exposure Studies (MATES). SCAQMD prepared MATES I in 1986; the analysis was limited due to the technology available at the time. Prepared in 1998, MATES II was the first MATES iteration to include a comprehensive monitoring program, an air toxics emissions inventory, and a modeling component. MATES III was prepared in 2004–2006, with MATES IV following in 2015. MATES V, the most recent study prepared in 2021, was developed using measurements during 2018 and 2019 and a comprehensive modeling analysis and emissions inventory based on 2018 data (SCAQMD 2021).

Like previous MATES, MATES V identified the San Pedro Bay Ports area as having the highest cancer risk in the SCAB, primarily due to the prevalence of diesel-powered sources. MATES V also concluded that cancer risk has continued to decline due to federal, state, and local regulations. MATES V showed that cancer risk in the SCAB decreased by approximately 40% since the MATES IV study and by 84% since MATES II. Much of this reduction has occurred at the San Pedro Bay Ports, reflecting emission reductions from port sources. In the Proposed Project area, cancer risk decreased from 1,470 per million reported in MATES IV to 638 per million reported in MATES V (SCAQMD 2021). MATES VI is currently underway.

3.1.2.3 Secondary $PM_{2.5}$ Formation

Primary particles are emitted directly into the atmosphere by fossil fuel combustion sources and windblown soil and dust. Secondary $PM_{2.5}$ forms in the atmosphere by complex reactions of precursor emissions of gaseous pollutants, such as NO_x, sulfur oxides (SO_x), VOC, and ammonia. Secondary $PM_{2.5}$ includes sulfates, nitrates, and complex carbon compounds. NO_x, SO_x, and VOC emissions could contribute to secondary $PM_{2.5}$ formation some distance downwind of the emission sources. Because it is difficult to predict secondary $PM_{2.5}$ formation from an individual project, the air quality analysis in this document focuses on the effects of direct $PM_{2.5}$ emissions. This approach is consistent with the recommendations of SCAQMD (SCAQMD 2006).

3.1.2.4 Atmospheric Deposition

The fallout of air pollutants to the surface of the earth is known as atmospheric deposition. Atmospheric deposition occurs in both a wet and dry form. Wet deposition occurs in the form of precipitation and is associated with the conversion in the atmosphere of directly emitted pollutants into secondary pollutants such as acids. Dry deposition occurs in the form of directly emitted pollutants or the conversion of gaseous pollutants into secondary particulate matter (PM). Atmospheric deposition can produce watershed acidification, aquatic toxic pollutant loading, deforestation, damage to building materials, and respiratory problems.

3.1.2.5 Odors

Odors are generally regarded as a nuisance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and is subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be acceptable to another. An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. A person can become desensitized to odors, and recognition occurs with an alteration in the intensity. The occurrence and severity of odor impacts depends on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

3.1.2.6 Sensitive Receptors

Sensitive receptor groups include children and infants, pregnant women, older adults, and the acutely and chronically ill. According to SCAQMD guidance, sensitive receptor locations typically include schools, hospitals, convalescent homes, child-care centers, and other locations where children, chronically ill individuals, or other sensitive persons could be regularly exposed. Sensitive individuals could also be present at any residence. The nearest sensitive receptors to the Proposed Project are possible liveaboards in the East Basin marinas, located approximately 0.22 miles to the northeast, and residences in San Pedro, located approximately 0.75 miles to the north.

The nearest school is George De La Torre Junior Elementary School at 500 Island Avenue in Wilmington, approximately 1.3 miles west of the Proposed Project site. The nearest hospital is Kaiser Permanente at 25825 Vermont Avenue in Los Angeles, approximately 3.1 miles to the northwest. The nearest convalescent home is the Wilmington Gardens assisted living facility at 1311 West Anaheim Street in Wilmington, approximately 2 miles to the northwest. The nearest child-care center is the New Harbor Vista Child Development Center at 909 West D Street in Wilmington, approximately 1.4 miles to the northwest.

3.1.3 REGULATORY SETTING

Sources of air emissions in the SCAB are regulated by international bodies, EPA, CARB, and SCAQMD. In addition, regional and local jurisdictions play a role in air quality management. This section provides a summary of existing rules, regulations, and policies that apply to the Proposed Project but is not intended to present an all-inclusive listing of applicable requirements.

3.1.3.1 International Regulations

International Maritime Organization International Convention for the Prevention of Pollution from Ships Annex VI

The International Maritime Organization (IMO) is an agency of the United Nations, formed to promote maritime safety. IMO's vessel pollution standards are contained in the International Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI. Requirements inside the North American Emission Control Area (ECA), which extends to 200 nautical miles (nm) off the Coast of North America, include the following:

- NO_x emission standards for marine diesel engines with output of more than 130 kilowatts (kW): Tier I as of 2000, Tier II as of 2011, and Tier III as of 2016. Ocean Going Vessel (OGV, vessel, or ship) engines would be subject to the program requirements. However, because the program applies to ship construction, no specific action would be required on the part of the Proposed Project.
- Sulfur content of fuel limit of 0.1% as of 2015. The Proposed Project assumes full compliance with MARPOL Annex VI SO_x limit.

3.1.3.2 Federal Regulations

The Clean Air Act

The federal Clean Air Act (CAA) of 1963 and its subsequent amendments form the basis for the nation's air pollution control effort. EPA is responsible for implementing most aspects of the CAA. Basic elements of the act include the NAAQS for major air pollutants, hazardous air pollutant standards, attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions.

The CAA delegates enforcement of the federal standards to the states. In California, CARB is responsible for enforcing air pollution regulations. CARB, in turn, delegates the responsibility of regulating stationary emission sources to local air agencies. In the SCAB, SCAQMD has this responsibility.

State Implementation Plan and Air Quality Management Plan

For areas that do not attain the NAAQS, the CAA requires the preparation of a State Implementation Plan (SIP), detailing how the state will attain the NAAQS within mandated timeframes. In response to this requirement, SCAQMD develops the Air Quality Management Plan (AQMP), which is incorporated into the SIP. The AQMP is updated every several years in response to NAAQS revisions, EPA SIP disapprovals, attainment demonstration changes, etc. Each AQMP builds on the prior AQMP. The AQMP is usually a collaborative effort between SCAQMD, CARB, and the Southern California Association of Governments (SCAG).

In October 2015, EPA strengthened the NAAQS for ground-level O_3, lowering the primary and secondary O_3 standard levels to 70 parts per billion (ppb). The SCAB is classified as an "extreme" nonattainment area for the 2015 O_3 NAAQS. SCAQMD adopted the 2022 AQMP in December 2022 to address the requirements for meeting this standard by 2037 (SCAQMD 2022). The 2022 AQMP strategies focus on NO_x reduction, a key pollutant in the formation of O_3, through the adoption of zero-emission technologies, low-NO_x technologies where zero-emission technologies are not available, federal actions, and incentive funding in environmental justice areas.

SCAQMD adopted the 2016 AQMP in March 2017 (SCAQMD 2017). It incorporated scientific and technological information, planning assumptions, and updated emission inventory methodologies for various source categories. The 2016 AQMP includes the integrated strategies and measures needed to meet the NAAQS and demonstrates how and when the SCAB plans to achieve attainment of the 1--hour and 8-hour O_3 NAAQS as well as the 24-hour and annual $PM_{2.5}$ standards. The 2016 AQMP reported that although population in the SCAG region has increased by more than 20% since 1990, air quality has improved due to air quality control projects at the local, state, and federal levels. In particular, 8-hour O_3 levels have been reduced by more than 40%, 1-hour O_3 levels by close to 60%, and annual $PM_{2.5}$ levels by close to 55% since 1990 (SCAQMD 2017).

Previous AQMPs included the 2012 AQMP for the 24-hour $PM_{2.5}$ standard along with early action measures to meet the 8-hour O_3 standard.

EPA Emissions Standards for Marine Diesel Compression Ignition Engines—Category 1 and 2 Engines

Engine categories are identified on the basis of engine displacement per cylinder. Category 1 engines have engine displacements per cylinder of less than 5 liters, whereas Category 2 engines have engine displacements of between 5 and 30 liters. Category 1 and 2 engines are often the auxiliary engines on large vessels as well as auxiliary and propulsion engines on harbor craft. To reduce emissions from these marine diesel engines, EPA established 1999 emission standards for newly built engines, referred to as Tier 2 marine engine standards. These standards were based on the land-based standard for off-road engines. The Tier 2 standards were phased in for vessels built between 2004 and 2007, depending on the engine size.

In March 2008, EPA finalized a program to further reduce emissions from marine diesel Category 1 and 2 engines. The regulations introduced Tier 3 and Tier 4 standards, which apply to both new and remanufactured diesel engines. The phase-in of Tier 3 standards extended from 2009 to 2014 for new Category 1 engines and from 2013 to 2014 for new Category 2 engines. Tier 4 standards were phased in for new Category 1 and 2 engines above 600 kW from 2014 to 2017. For remanufactured engines, standards apply only to commercial marine diesel engines above 600 kW when the engines are remanufactured, and as soon as certified systems are available.

Vessel auxiliary engines and harbor craft propulsion/auxiliary engines would be subject to the program requirements. However, because the program applies to engine manufacturers, no specific action would be required on the part of the Proposed Project.

EPA Emission Standards for Large Marine Diesel Engines—Category 3 Engines

Category 3 engines have engine displacements per cylinder greater than 30 liters. Category 3 engines are propulsion engines on vessels. To reduce emissions from these engines, EPA established 2003 Tier 1 NO_x standards for marine diesel engines above 30 liters per cylinder, large Category 3 marine propulsion engines on U.S. flagged OGVs (40 CFR Parts 9 and 94; 68 FR 9745–9789). The standards went into effect for new engines built in 2004 and later. Tier 1 limits were achieved by engine-based controls, without the need for exhaust gas after-treatment.

In December 2009, EPA adopted Tier 2 and Tier 3 emissions standards for newly built Category 3 engines installed on U.S. flagged vessels, as well as marine fuel sulfur limits. The Tier 2 and 3 engines standards and fuel limits are equivalent to the amendments to MARPOL Annex VI. Tier 2 NO_x standards for newly built engines applied beginning in 2011 and require the use of engine-based controls, such as engine timing, engine cooling, and advanced electronic controls. Tier 3 standards applied beginning in 2016 in ECAs and would be met with the use of high efficiency emission control technology, such as selective catalytic reduction. The Tier 2 standards are anticipated to result in a 15% to 25% NO_x reduction below the Tier 1 levels; Tier 3 standards are expected to achieve NO_x reductions 80% below the Tier 1 levels (DieselNet 2022). In addition to the Tier 2 and Tier 3 NO_x standards, the final regulation established standards for hydrocarbon (HC) and CO.

Vessel propulsion engines would be subject to the program requirements. However, because the program applies to engine manufacturers, no specific action would be required on the part of the Proposed Project.

EPA Emission Standards for Off-Road Diesel Engines

EPA established a series of emission standards for new off-road diesel engines. Tier 1 standards were phased in from 1996 to 2000; Tier 2 standards were phased in from 2001 to 2006; Tier 3 standards were phased in from 2006 to 2008; and Tier 4 standards, which require add-on emission control equipment, were phased in from 2008 to 2015. For each Tier category, the phase-in schedule was driven by engine size (EPA 2016).

Off-road equipment would be subject to the program requirements. However, because the program applies to engine manufacturers, no specific action would be required on the part of the Proposed Project.

EPA Emission Standards for On-Road Trucks

Heavy-duty trucks are subdivided into three categories by the vehicle's gross vehicle weight rating (GVWR): light heavy-duty trucks (8,500 to 19,500 pounds), medium heavy-duty trucks (19,500 to 33,000 pounds), and heavy heavy-duty trucks (greater than 33,000 pounds).

To reduce PM, NO_x, and VOC from on-road heavy-duty diesel trucks, EPA established a series of progressively cleaner emission standards for new engines starting in 1988. These emission standards have been revised over time, with the latest major revision in December 2022, when EPA finalized new emission standards for heavy-duty engines, that will become effective in 2027. The standards are to some degree harmonized with the CARB low NO_x rule but are less stringent in terms of both emission limits and emission durability requirements. The NO_x limit is 0.035 grams per brake horsepower-hour (hp-hr), while the useful life period for heavy heavy-duty engines is 650,000 miles (DieselNet 2023a).

Vehicles, such as trucks used to transport products, would be subject to the program requirements. However, because the program applies to engine manufacturers, no specific action would be required on the part of the Proposed Project.

EPA Emission Standards for Cars and Light-Duty Trucks

To reduce emissions from on-road cars and light-duty trucks, EPA established a series of progressively cleaner emission standards for new engines starting in 1991. Tier 1 standards were phased in progressively between 1994 and 1997; Tier 2 standards were phased in between 2004 to 2009; and Tier 3 standards are being phased in between 2017 and 2025. During the phase-in period, manufacturers are required to certify an increasing percentage of their new vehicle fleet to the new standards, with the remaining vehicles still certified to the preceding tier of emission regulations (DieselNet 2023b).

Vehicles, such as worker vehicles, would be subject to the program requirements. However, because the program applies to engine manufacturers, no specific action would be required on the part of the Proposed Project.

EPA Emission Standards for Locomotives

To reduce emissions from locomotive engines, EPA established a series of progressively cleaner emission standards for new and remanufactured railway locomotives fueled by diesel and by other fuels (e.g., natural gas). Tier 0-2 standards became effective in 2000 and applied to locomotives manufactured prior to 1973. Tier 3 standards became effective in 2011. Tier 4 standards, which were originally intended to require exhaust gas aftertreatment technologies, became effective in 2015.

Locomotive engines used to transport rail cars loaded with product would be subject to the program requirements. However, because the program applies to locomotive manufacturers, no specific action would be required on the part of the Proposed Project.

3.1.3.3 State Regulations and Agreements

California Clean Air Act

In California, CARB is designated as the state agency responsible for all air quality regulations. CARB, which became part of the California EPA (CalEPA) in 1991, is responsible for implementing the requirements of the federal CAA, regulating emissions from motor vehicles and consumer products, and implementing the California Clean Air Act of 1988 (CCAA). The CCAA outlines a program to attain the CAAQS for criteria pollutants. Since the CAAQS are generally more stringent than the NAAQS, attainment of the CAAQS requires greater emission reductions than what is required to show attainment of the NAAQS. Similar to the federal system, state requirements and compliance dates are based on the severity of the ambient air quality standard violation within a region.

Community Air Protection Program and AB 617

In response to Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes of 2017), CARB established the Community Air Protection Program. The program's focus is to reduce exposure in communities most impacted by air pollution. The program includes community air monitoring and Community Emissions Reduction Programs (CERPs), early actions to address localized air pollution through incentive funding, and grants to support community participation. AB 617 also includes requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater

transparency and availability of air quality and emissions data, intended to help advance air pollution control efforts throughout the state (CARB 2018).

Although this is a state program and as such does not have project-specific requirements, it is included here to highlight the state's efforts to continue to enhance air quality planning efforts and better integrate community, regional, and state-level programs. In addition, SCAQMD adopts rules pursuant to the CERPs. One such development is SCAQMD Rule 1460, Control of Particulate Emissions from Metal Recycling and Shredding Operations, discussed in Section 3.1.3.4, Local Regulations and Agreements.

CARB Heavy-Duty Diesel Vehicle Idling Emission Reduction Regulation

This CARB rule has been in effect for heavy-duty diesel trucks in California since 2008. The rule requires that heavy-duty trucks be equipped with a non-programmable engine shutdown system that shuts down the engine after 5 minutes or optionally meet a stringent NO_x idling emission standard (13 CCR 13 1956.8 and 2485).

Vehicles, such as trucks used to transport products during Phase 1 and trucks used during Phase 2, would be subject to these requirements.

CARB California Diesel Fuel Regulation

Under this rule, CARB requires that the sulfur content of diesel fuel be limited to 15 ppm in motor vehicles, harbor craft, and switch locomotives.

Diesel fuel used in trucks, harbor craft, and switch locomotives would be subject to these requirements. However, because the program applies to fuel producers, no specific action would be required on the part of the Proposed Project.

CARB In-Use Off-Road Diesel-Fueled Fleets Regulation

CARB has regulated in-use off-road diesel vehicles since 2008 through the In-Use Off-Road Diesel-Fueled Fleets Regulation. The regulation requires vehicle fleets to reduce their emissions by retiring older vehicles and replacing the retired vehicles with newer vehicles, repowering older engines, or installing verified diesel emission control strategies in older engines, and by restricting the addition of older vehicles to fleets. The regulation also limits equipment idling (CARB 2023).

The regulation was amended several times, most recently in 2010. In November 2022, CARB approved additional amendments to the regulation aimed at further reducing emissions from the off-road sector. The amendments would phase in starting in 2024 through 2036 and would include changes to enhance enforceability and encourage the adoption of zero-emission technologies. The amendments have not yet been submitted for review and approval to California's Office of Administrative Law (OAL) (CARB 2023) and are therefore not considered in analysis of the Proposed Project.

Off-road equipment, such as the kind used during Phase 2, would be subject to the program requirements.

CARB Measures to Reduce Emissions from Goods Movement Activities

CARB Regulations for Fuel Sulfur and Other Operational Requirements for OGVs within California Waters and 24 Nautical Miles of the California Baseline

Starting in 2009, this CARB regulation has gradually reduced the permitted sulfur content of OGV fuels used in ship main engines, auxiliary engines, and auxiliary boilers. As of 2014, marine engines

operating in California waters must use marine diesel oil (MDO) or marine gas oil (MGO) with a maximum sulfur content of 0.1%.

The analysis assumes compliance with 0.1% sulfur content of fuel used in vessel engines.

CARB Regulation to Reduce Emissions from Diesel Auxiliary Engines on OGVs While at Berth at a California Port

In 2007, CARB adopted a regulation to reduce emissions from auxiliary diesel engines on OGVs while at berth for container, cruise, and refrigerated cargo OGVs (17 CCR 93118.3). The regulation requires that these types of vessels either shut down their auxiliary engines for a stipulated percent of fleet visits and connect to shore-side electricity or use control technology to reduce auxiliary engine emissions by an equivalent amount.

In 2020, the At-Berth Regulation was amended to increase requirements for OGVs previously subject to the regulation starting in 2023. The regulation was also expanded to include auto carriers (roll-on/roll-off vessels) and tanker ships. Requirements for the expanded OGV types would begin in 2025 at the Ports of Los Angeles and Long Beach (CARB 2020c). However, dry-bulk vessels such as those used to transport metal as part of the Proposed Project would not be subject to the regulation.

CARB Emission Standards, Test Procedures, for Large Spark Ignition Engine Forklifts and Other Industrial Equipment

Since 2007, CARB has promulgated more stringent emissions standards for hydrocarbon and oxides of nitrogen combined (HC + NO_x) emissions and test procedures. These engine emission standards and test procedures were implemented in two phases. The first phase was implemented for engines built between January 2007 and December 2009. The second more stringent phase was implemented for engines built starting in January 2010. The regulation was amended in 2010 establishing fleet average emissions requirements for existing engines (13 CCR 2775).

Forklifts and other industrial engines would be subject to the program requirements. However, because the program applies to engine manufacturers, no specific action would be required on the part of the Proposed Project.

CARB California Drayage (Heavy Duty) Truck Regulation

CARB adopted the drayage truck regulation in 2007 to modernize the class 8 drayage truck fleet (trucks with GVWR greater than 33,000 pounds) in use at California's ports; subsequent amendments of the rule accelerated the compliance schedule and expanded the definition of drayage trucks. The regulation currently requires that all trucks operating at California ports comply with the 2007 and newer on-road heavy-duty engine standards.

For purposes of this analysis, this regulation affects the truck fleet mix projections for the Proposed Project, which is accounted for in CARB's Emission Factors Model (EMFAC) and is the basis of the regional diesel truck fleet emission factors used in the calculations.

CARB On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation—Truck and Bus Regulation

In 2011, CARB amended the 2008 State-wide Truck and Bus Regulation to modernize in-use heavy-duty vehicles operating throughout the state. Under this regulation, existing heavy-duty trucks are required to be replaced with trucks meeting the latest NO_x and PM Best Available Control Technology (BACT) or retrofitted to meet these levels.

Trucks with GVWR less than 26,000 pounds were required to replace engines with 2010 or newer engines, or equivalent, by January 2023. Trucks with GVWR greater than 26,000 pounds were required to meet PM BACT and upgrade to a 2010 or newer model year emissions equivalent engine pursuant to the compliance schedule set forth by the rule. By January 1, 2023, all model year 2007 class 8 heavy duty trucks were required to meet NO_x and PM BACT (i.e., EPA 2010 and newer standards).

For purposes of this analysis, this regulation affects the truck fleet mix projections for the Proposed Project, which is accounted for in CARB's EMFAC model and is the basis of the regional diesel truck fleet emission factors used in the calculations.

CARB Advanced Clean Truck Program

CARB developed the Advanced Clean Truck (ACT) Program in 2021. The ACT is intended to increase the penetration of zero-emission heavy-duty trucks into the market. A key feature is a zero-emission vehicle (ZEV) truck sales mandate that would begin in 2024 and increase to up to 75% ZEV by 2035 depending on truck GVWR.

Vehicles, such as trucks used to transport products, would be subject to the program requirements. However, because the program applies to vehicle sales, no specific action would be required on the part of the Proposed Project.

CARB Advanced Clean Cars Program

CARB developed the Advanced Clean Cars II regulations in 2022, imposing the next level of low-emission and zero-emission vehicle standards for vehicle model years 2026–2035. The program aims to help meet federal ambient air quality ozone standards and California's carbon neutrality targets. A key feature is a ZEV passenger cars, trucks, and sport utility vehicle sales mandate that would ramp up to 100% ZEV sales by 2035.

Vehicles, such as worker vehicles, would be subject to the program requirements. However, because the program applies to vehicle sales, no specific action would be required on the part of the Proposed Project.

CARB In-Use California Harbor Craft Regulation

CARB has regulated in-use harbor craft since 2008 through the California Harbor Craft Regulation. The regulation was amended in 2010 and again in 2022 (CARB 2022). The 2010 regulation requires older harbor craft operators to reduce emissions by retiring or retrofitting older harbor craft and replacing the retired harbor craft with newer harbor craft. The 2022 amendments added and expanded requirements for emissions, reporting, fuel use, idling, and facility power. For example, starting in January 2024, all harbor craft are required to use renewable diesel and reduce idling to 15 minutes; tugboat engines are required to upgrade to Tier 4+diesel particulate filters starting in January 2025. Tugboats used to maneuver vessels would be subject to these requirements.

Although CARB's revised regulatory requirements for harbor craft operating at the Port began in 2023, this analysis conservatively does not take credit for associated emission reductions. This decision was made by the Los Angeles Harbor District (LAHD) to ensure that impacts are not underestimated if the regulation is contested or that CARB postpones compliance. Instead, the analysis assumed compliance with CARB's regulation as adopted in 2010, prior to its 2022 revision.

3.1.3.4 Local Regulations and Agreements

SCAQMD develops rules and regulations to regulate sources of air pollution in the SCAB. SCAQMD's regulatory authority applies primarily to stationary sources. The following list identifies notable SCAQMD rules that apply to the Proposed Project but is not intended to present an all-inclusive list of applicable requirements.

Rule 402, Nuisance

This rule prohibits the discharge of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any such persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property.

Rule 403, Fugitive Dust

This rule prohibits emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area that remains visible beyond the emission source property line. Requirements may include submitting a dust control plan, maintaining dust control records, and designating a SCAQMD-certified dust control supervisor.

During Phase 2 – Non-operational Restoration activities, best available control measures identified in the rule would be required to minimize fugitive dust emissions from proposed earth-moving and grading activities. These measures would include site watering as necessary to maintain sufficient soil moisture content. Additionally, the Proposed Project would not be considered a large operation under Rule 403 because the site size is less than 50 acres. The Proposed Project would therefore meet rule requirements by implementing applicable best available control measures listed in Rule 403 Table 1.

Rule 431.1, Sulfur Content of Gaseous Fuels

This rule prohibits the transfer, sale, or offer of sale of natural gas containing sulfur compounds in excess of 16 ppm by volume. Phase 1 – Continued Operation of the Proposed Project would continue to operate a natural gas-fired thermal oxidizer. Natural gas would continue to be supplied by the Los Angeles Department of Water and Power, which is subject to these sulfur compound limits. Therefore, no specific action would be required on the part of the Proposed Project.

Rule 1155, Particulate Matter Control Devices

This rule applies to permitted PM air pollution control (APC) devices venting process that have direct (non-combustion) PM emissions, such as baghouses, high efficiency particulate air systems, bin vents, or other dust collectors using high efficiency or other air filters, cyclones, electrostatic precipitators, and wet scrubbers. The Proposed Project would continue to operate several pieces of equipment subject to this rule, under existing SCAQMD permits.

Rule 1460, Control of Particulate Emissions from Metal Recycling

SCAQMD developed this rule pursuant to AB 617 and resultant CERP action to address fugitive emissions from metal recyclers and shredding facilities. The rule, adopted in 2022, is designed to reduce fugitive dust emissions from metal recycling and metal shredding operations. Requirements include registration, housekeeping, best management practices, signage, and recordkeeping. SA Recycling registered the facility with SCAQMD, per regulatory requirement in June 2023.

Normal operations at SA Recycling already include many of the housekeeping requirements, such as cleaning of traffic areas, and best management practices, such as watering and enclosed storage to minimize fugitive dust. The Proposed Project would be required to comply with requirements of Rule 1460.

3.1.3.5 LAHD Emission Reduction Programs

LAHD has developed several programs designed to reduce pollution from mobile sources associated with Port operations. Programs pertinent to the Proposed Project are listed below.

San Pedro Bay Ports Clean Air Action Plan

The Ports of Los Angeles and Long Beach, with the participation and cooperation of EPA, CARB, and SCAQMD staff, developed the San Pedro Bay Ports Clean Air Action Plan (CAAP), a planning and policy document that sets goals and implementation strategies to reduce air emissions and health risks associated with port operations while allowing for future port development (POLA 2006-2017).

The 2006 CAAP focused primarily on reducing DPM, a TAC associated with cancer risk, as well as NO_x and SO_x, criteria pollutants. The 2010 CAAP Update introduced the San Pedro Bay Standards, which established the following emission and health risk reduction goals, in comparison to 2005 emission levels:

- Health Risk Reduction Standard: 85% reduction in DPM by 2020
- By 2023, reduce emissions by 77% for DPM, 59% for NO_x, and 92% for SO_x

The CAAP's Project-Specific Standard requires that new projects fall below the 10 in 1 million excess residential cancer risk threshold. The CAAP also includes emission control measures, Source-Specific Performance Standards, which may be implemented through the environmental review process, or included in new leases or port-wide tariffs, Memorandum of Understandings (MOUs), voluntary action, grants, or incentive programs.

- CAAP Measure—SPBP-OGV1, Vessel Speed Reduction Program (VSRP). This is a voluntary program that incentivizes OGVs to reduce their speed to 12 knots or less within 40 nm of the Point Fermin Lighthouse. Speed reduction decreases the power demand of propulsion engines, leading to lower fuel consumption and, consequently, reduced emissions.

The 2017 CAAP Update re-affirmed the commitment of the Ports of Los Angeles and Long Beach to the goals and standards of previous CAAP versions and introduced new goals, standards, and programs. It also aligned with the commitments of the Cities of Los Angeles and Long Beach to move towards zero emissions at the Ports of Los Angeles and Long Beach, including setting goals of zero-emissions cargo-handling equipment by 2030 and zero-emissions heavy-duty trucks by 2035. Accordingly, the 2017 CAAP Update includes provisions for new investments in clean technology, expanded use of at-berth emission reduction technologies, and a zero-emissions heavy-duty truck pilot program. Finally, the 2017 CAAP Update also introduced new greenhouse gas (GHG) emission reduction targets, which are discussed in Section 3.3, Greenhouse Gas Emissions.

LAHD Sustainable Construction Guidelines

As part of LAHD's overall environmental goals and CAAP strategies, any construction at the Port must follow the Sustainable Construction Guidelines (SCG), adopted in February 2008 (LAHD 2009). The guidelines reinforce and require sustainability measures under construction contracts, addressing a variety of emission sources that typically operate at the Port during construction. Examples include ships and barges used to deliver construction-related materials, harbor craft, dredging equipment,

haul and delivery trucks, and off-road construction equipment. In addition, the LAHD Construction Guidelines include best management practices based on CARB-verified BACT, designed to reduce air emissions from construction sources. The SCG are treated as project design features, and this analysis, accordingly, assumes compliance with the SCG.

3.1.4 METHODOLOGY

This section summarizes the methodology used to quantify air quality and health impacts from continued operation (Phase 1) and non-operational restoration (Phase 2) activities of the Proposed Project. Phase 1 and Phase 2 activities are described in detail in Chapter 2 (see Section 2.5.1). The analysis assumptions, source characteristics, activity, emission factors, and other supporting information are presented in a tabular format in Appendix B, Air Quality and GHG Calculation Tables.

Impacts were determined by subtracting the CEQA Baseline, which is discussed at the end of this section, from the Proposed Project's peak day emissions and comparing the resulting increment to SCAQMD significance thresholds, discussed in Section 3.1.5.

The emissions quantified in this analysis were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. The numerical results presented in the tables of the report were rounded, often to the nearest whole number, for presentation purposes. As a result, totals presented in the tables may not add exactly.

Summary of Phase 1 Activities and Analysis Methodology

The Proposed Project site is approximately 26.7 acres and is nearly 100% paved. Scrap metal is transported to the facility via heavy-duty trucks from nearby locations. A small portion of scrap metal also arrives via rail car from other SA Recycling facilities in the western United States. The Proposed Project would continue to operate the facility for up to 10 years under the proposed lease extension without throughput or activity changes; throughput would remain at 1.2 million tons.

Scrap metal is processed based on the size and type of material. Heavier materials like demolition scrap (plate and structural beams) are sheared into smaller lengths using hydraulic shears. Busheling (brand-new manufacturing scrap) and heavy melting steel are stockpiled for future shipping. Flattened automobiles, appliances, and other lighter materials are sent to the electric shredder. Materials that are too big for the shredder (such as buses, containers, and trucks) are first sheared or cut via a mobile shear and then shredded. Most scrap vehicles arrive at the yard flattened and de-polluted (i.e., drained of fluids, and without batteries). A small number of whole (non-flat) buses and trucks that arrive at the yard are de-polluted on site prior to being sheared and then shredded.

Shredded material is separated into magnetic materials (ferrous steel) and non-magnetic materials (non-ferrous metals, copper, aluminum, and stainless steel). Drum magnets are used to recover magnetic materials. A non-ferrous Metal Recovery Plant (MRP) uses eddy-current magnetic sorting along with other technologies to recover non-magnetic metallic materials. Sorted materials are then moved to covered storage areas via conveyor belts or diesel-fueled mobile equipment where they are stockpiled for transport. Some material is temporarily stockpiled outside of covered areas.

The shredder is equipped with an APC system that filters particulates, oils, and moisture. The APC includes a natural gas-fired Regenerative Thermal Oxidizer (RTO) that destroys VOCs and chlorofluorocarbons (CFCs) and a chemical scrubber that neutralizes residual acid gases.

Processed ferrous metals are loaded onto bulk ships via dump trucks and a diesel-electric hybrid crane (primarily operated in electric mode) and transported via ships to ports primarily in Southeast Asia.

Non-ferrous metals are loaded into containers, which are transported via trucks to other Port terminals for loading onto container vessels.

Approximately 72% of the shredder feedstock is ferrous steel, and 6% is non-ferrous metals. The remaining 22% is Metal Shredder Residue (MSR), which consists of plastics, upholstery, foam, rubber, glass, etc. MSR is stabilized on site with a cement blend resulting in a mix that is transported to a landfill for use as alternative daily cover. Table 2-1 in Chapter 2 shows the general level of activity associated with Phase 1. Activity associated with each emissions source is discussed in detail in Appendix B and summarized in this section.

Phase 1 activities, discussed above, include sources of emissions from the transport of materials, as well as material handling and material processing. The following sources of emissions were considered in the analysis:

- Phase 1 Material Transport Sources:
  - **Dry-bulk vessels (engine exhaust).** The majority of processed ferrous metal would continue to be loaded onto 40,000 to 45,000 metric ton (MT) dry-bulk vessels that dock at Berths 210 and 211 and would then be transported to ports primarily in Southeast Asia. Twenty-eight vessels called at Berths 210 and 211 in 2021/2022 and would continue to do so during the proposed 10-year lease. Vessels would continue to spend approximately 3 days at berth during loading. Vessel activity is summarized in Appendix B, Table A-1.

    Emissions were calculated using the methodology detailed in the Port's Emission Inventory Methodology Document (POLA 2023b). Emissions were calculated at berth, at anchorage, and during transit in six transit zones summarized in Appendix B, Table A-11. Vessel emissions were calculated for propulsion engines used to propel the vessel, auxiliary engines that provide electricity during ship operations, and auxiliary boilers that produce hot water and steam for ship use. Vessel propulsion engine power and other engine characteristics were based on vessel call data provided by SA Recycling. Propulsion engine power is presented in Appendix B, Table A-8. Other propulsion engine characteristics, such engine tier and slide valve information are presented in Appendix B, Table A-1. Auxiliary engine and boiler power were based on information for typical vessels calling at the Port from the 2022 Port Emissions Inventory (POLA 2023c) and are presented in Appendix B, Table A-9. Vessel characteristics were assumed not to change in future years; this is a conservative assumption because vessels in future years may have cleaner engines.

    Emissions were calculated for a peak day (24-hour period) consisting of one vessel at the berth for a portion of the peak day, a second vessel en route to the berth, the first vessel completing its loading and departing, and the second vessel at berth for the remaining portion of the peak day. This scenario occurred several times in 2021/2022 and would reasonably occur during Phase 1.

    Propulsion engines operate during vessel transit but are typically turned off while at berth. Auxiliary engines operate both at berth and during transit. Auxiliary boilers typically operate at berth and during transit through two zones (i.e., inside the harbor and between the break-water and the precautionary zone). Because vessel transit uses propulsion engines, auxiliary engines, and boilers, it is more energy intensive and results in higher emissions than vessel hoteling, which uses only auxiliary engines and boilers. Therefore, to assess regional impacts, the analysis maximized vessel transit activities (i.e., approximately 6 hours for vessel transit through the SCAB over-water boundary); the remaining part of the 24-hour period was assumed to be spent hoteling at berth. Conversely, to assess localized impacts, the analysis maximized vessel hoteling and calculated emissions for a 24-hour period at berth.

Emissions were calculated as a function of vessel power demand, with energy expressed in kilowatt-hours (kW-hr), multiplied by an emission factor, expressed in terms of grams per kilowatt-hour (g/kWhr). Emission factors were adjusted for low propulsion engine loads. Engine characteristics (i.e., load factors, hoteling times, transit distance, emission factors, etc.) were obtained from vessel data provided by SA Recycling, the Port 2022 Emissions Inventory (POLA 2022b), and the 2023 San Pedro Bay Ports Emissions Inventory Methodology Report (POLA 2023b). Vessel characteristics are detailed in Appendix B, Tables A-7 through A-20.

- **Tugboats (engine exhaust).** Diesel tugboats have historically assisted vessels calling at Berths 210 and 211 in the harbor and during maneuvering at berth. Typically, two tugboats are needed to assist each vessel. Emissions were calculated for a peak day of vessel activity, discussed above.

  Emissions were calculated as a function of tugboat power demand in kW, activity in hours, and engine load factors multiplied by an emission factor expressed in terms of g/kWhr. Tugboat characteristics (i.e., engine size, load factors, emission factors, etc.) were obtained from the Port 2022 Emissions Inventory (POLA 2022b) and the 2023 San Pedro Bay Ports Emissions Inventory Methodology Report (POLA 2023b) and are detailed in Appendix B, Tables A-21 through A-26.

- **Trucks (exhaust, tire wear, brake wear, and road dust).** Table 2-1 in Chapter 2 shows average daily truck deliveries. However, more trucks visit the facility on a peak day than on an average day. On a peak-day basis, a total of 338 trucks called at the facility in 2021/2022. Of these, 319 were metal delivery trucks, 15 were vendor/other delivery trucks, and 4 were container trucks transporting non-ferrous metals from the facility. Truck activity and transit distances are presented in Appendix B, Table A-2. Exhaust emissions were calculated for idling, off-site transit, and on-site transit. Tire wear, brake wear, and entrained road dust emissions were calculated for off-site and on-site transit.

  All trucks were assumed to be diesel-fueled. Although the population of natural gas trucks may increase in future years and electric trucks are anticipated to increase, the population of these trucks is currently small, and diesel trucks still account for the majority of trucks. The use of all diesel trucks in the analysis is a conservative assumption because diesel fuel results in higher emissions for most pollutants and in particular for DPM.

  Emissions from exhaust, tire wear, and brake wear were calculated as a function of activity, represented by one-way trips, multiplied by the one-way transit distance, and then multiplied by an emission factor. Transit distances were provided by SA Recycling based on 2021/2022 operations. CARB's EMFAC 2021 (CARB 2021a), a computer-based mathematical model used by the state of California to calculate motor vehicle emissions, was used to obtain exhaust, tire wear, and brake wear emission factors for heavy-duty trucks. Emission factors are presented in Appendix B, Table A-30, and EMFAC Output is presented in Appendix B, Tables A-31 through A-35.

  Road dust emissions were quantified for both on-site and off-site transit using one-way transit distances and emission factors obtained from CARB's methodology for entrained road dust (CARB 2021b). CARB's methodology correlates emissions with silt loading, average weight of all vehicles on the roadway, and the fraction of transit along roadways defined in the methodology. Road dust emission factors are presented in Appendix B, Table A-36.

- **Worker vehicles (engine exhaust, tire wear, brake wear, and road dust).** Table 2-1 in Chapter 2 shows 280 average one-way employee trips; on a peak day, the number of workers at the facility would stay the same. Exhaust emissions were calculated for total exhaust off site, which includes idling and transit exhaust; worker vehicles would not

transit any appreciable distance on site. Tire wear, brake wear, and entrained road dust emissions were calculated for off-site transit.

Worker vehicles reflect the California fleet of gasoline, electric, plug-in hybrid, and a very small percentage of diesel vehicles obtained from CARB's EMFAC. Emissions were calculated using a similar approach to truck emissions, except that the transit distance of 18.5 miles was obtained from the California Emissions Estimator Mode (CalEEMod), and emission factors appropriate to automobiles were obtained by running CARB's EMFAC (CAPCOA 2022; CARB 2021a). Appendix B, Table A-37, shows the transit distance, and Table A-38 presents emission factors used in the analysis.

- **Locomotives (engine exhaust).** Table 2-1 in Chapter 2 shows that three rail cars were delivered on a peak day in 2021/2022. This activity is not expected to change in future years. The three rail cars would continue to be pulled by a diesel-fueled Pacific Harbor Line (PHL) switch locomotive, which picks up and drops off railcars and transports them to nearby rail yards for incorporation into trains. Switch locomotive emissions were based on the horsepower-hours (hp-hr) of work calculated from the locomotive fuel use, reported in the Port 2022 Emission Inventory and emission factors, expressed in grams per horsepower-hours (g/hp-hr) from the 2023 San Pedro Bay Ports Emissions Inventory Methodology Report (POLA 2023b). The emission factors in g/hp-hr were converted to grams per hour (g/hr) by multiplying by the PHL fleet average in-use horsepower (hp) of 203. The g/hr emission factors were then multiplied by the locomotive use of 3 hours per visit, which is based on the distance to nearby PHL rail yards. Locomotive activity and emission factors are presented in Appendix B, Tables A-39 through A-42.

- **Phase 1 On-Site Sources Subject to Annual Emissions Reporting (AER) (engine exhaust and fugitives).** Annual emissions from stationary material handling and material processing sources were quantified by SA Recycling and reported to SCAQMD as part of SCAQMD's AER program. Annual emissions reported in the AER were divided by 312 annual operating days to calculate peak day emissions. Although the facility is open 7 days per week, operations typically occur Monday through Friday, occasionally on Saturdays, and on Sundays only when a vessel is at the berth. The use of 312 days per year results in a conservative estimate of daily emissions. Emissions reported in the AER are provided in Appendix B, Table A-47 and include the following:
  - External combustion equipment such as the natural-gas RTO used as part of the shredder air quality control to destroy VOCs and CFCs, a propane-fueled heater, and a propane-fueled boiler
  - Internal combustion engines such as a stationary diesel-fueled emergency generator, a portable diesel-fueled engine, a portable gasoline-fueled engine, and a propane-fueled engine
  - Spray booth for metal coating
  - Aerosol degreaser
  - One diesel and one gasoline storage tank
  - Cement silos that store a cement blend used to stabilize non-ferrous MSR waste for subsequent transport to a landfill for use as alternative daily cover
  - Electric shredder stack and fugitive particulate emissions
  - Particulate emissions from metal shearing, non-ferrous material loading, MRP, welding, and storage pile management
- **Phase 1 On-Site Sources not Subject to AER Reporting (engine exhaust and fugitives).** Emissions from mobile equipment and loading/unloading activities, not subject to AER reporting, were calculated based on SA Recycling's 2021/2022 inventory of equipment, equipment size, equipment tier, and activity. Future activity is not expected to change from 2021/2022, although some equipment may be replaced with cleaner equipment due to regulatory requirements and the turnover of aging equipment. This analysis conservatively

assumed no turnover in future years beyond 2023. Equipment activity, size, engine tier, and activity provided by SA Recycling are presented in Appendix B, Table A-49.

Emissions were calculated for engine exhaust, road dust generated as equipment travels over paved facility areas, and fugitive dust emissions from material loading and handling. Exhaust emissions were calculated as the product of annual equipment activity in hours per year (hr/yr), engine size in horsepower, engine load factors, and emission factors. Peak day emissions were calculated by dividing annual emissions not related to vessel-loading by 312 days. Annual emissions, related to ship-loading, were divided by 89 days, which is the number of days a vessel was at Berths 210 and 211 in 2021/2022. As noted above, annual equipment activity and engine size were provided by SA Recycling. Engine load factors and emission factors were obtained from CalEEMod's Appendix G (CAPCOA 2022) and are presented in Appendix B, Table A-49.

Road dust emissions were calculated as the product of miles traveled by mobile equipment on site and emission factors developed by CARB for entrained road dust (CARB 2021b). Miles traveled were estimated by SA Recycling and are presented in Appendix B, Table A-49. Road dust emission factors are presented in Table A-36.

Fugitive dust emissions from material loading and handling activities are a function of the amount of material processed. Annual tons of material processed for specific activities were multiplied by emission factors. Peak day emissions were calculated by dividing annual emissions not related to vessel-loading by 312 days and those related to ship-loading by 89 days, as noted above. Emission factors for loading activities (i.e., truck loading, bucket crane loading) and material handling activities (i.e., handling of all materials except plates/structural steel and other non-shredded material as this material is too large to result in fugitive dust) were obtained from EPA's AP 42 Compilation of Emission Factors, Chapter 12.5 (EPA 1986). These emission factors are conservative because they reflect material sizes that are much smaller than material being loaded at SA Recycling. Emission factors for fugitive dust associated with operation of the mobile metal shear were assumed to be the same as those reported for the stationary metal shear process in the AER.

Loading and material handling activities utilize water spray, and facility roads are routinely swept to control fugitive dust. Control efficiencies of 90% for water spray and 16% for sweeping, obtained from the 2006 Western Regional Air Partnership Handbook (WRAP 2006), were used in the analysis.

Emissions were calculated for the following:

- Material handling equipment such as diesel-fueled bulldozers, backhoes, excavators, forklifts, trucks, loaders, manlifts, grapplers, shears, other material handlers, mobile cranes, a rail pusher, skid-steer loaders, sweepers, water trucks, and propane-fueled and electric forklifts
- Material handling activities such as loading/unloading of trucks and bucket crane

Summary of Phase 2 Activities and Analysis Methodology

Chapter 2 identifies that Phase 2 – Non-operational Restoration Period activities could take up to 5 years to complete. For the purposes of this analysis, it assumed that all required Phase 2 activities would occur over a 37-month period. This is a conservative assumption because it concentrates activities into fewer years and results in higher peak day emissions. During Phase 2, the facility would be decommissioned, buildings would be demolished, metal structures would be dismantled, and the metal would be sheared, loaded onto a dry-bulk vessel, and shipped out. The concrete slab that covers nearly the entire property and concrete structural foundations would be broken, stockpiled, crushed using a mobile concrete crusher, and trucked off site. Soil would be tested; contaminated soil would

be transferred to a hazardous waste landfill, whereas non-contaminated soil would either be reused on site or transferred to a non-hazardous landfill. Clean replacement soil would be trucked to the facility, and the site would be compacted and re-graded. Finally, ground cover (i.e., gravel, crushed aggregate base, etc.) would be trucked to and spread over the site. Table 2-1 in Chapter 2 shows the general level of activity associated with Phase 2.

Phase 2 activities, summarized above, would include sources of emissions from off-road equipment operating on site, material handling, and material transport. The following sources of emissions were considered in the analysis:

- **One dry-bulk vessel (engine exhaust) to transport metal from dismantled structures.** One vessel would be needed for 1 day to load and transport approximately 5,500 tons of processed metal from dismantled on-site structures. Vessel emissions were calculated using the same methodology discussed in Phase 1 for dry-bulk vessels. Since only 1 day would be needed to load and transport all the metal, peak regional and localized emissions were calculated for one vessel in transit for a portion of a 24-hour period (i.e., approximately 6 hours, the time it takes to transit through California's SCAB-boundary) and the same vessel at berth for the remainder of the same 24-hour period.
- **Tugboats (engine exhaust).** Two tugboats would be used to assist the vessel. The same methodology described in Phase 1 was used in the analysis of Phase 2 tugboats.
- **Diesel off-road equipment (engine exhaust).** Off-road equipment would be used to demolish and process metal structures, concrete, and soil. Emissions were quantified using the California Air Pollution Control Officers Association's CalEEMod model, described below.
- **Diesel trucks (engine exhaust, tire wear, brake wear, and road dust).** Trucks would be used to transport concrete and soil. Emissions were quantified using CalEEMod.
- **Worker vehicles (engine exhaust, tire wear, brake wear).** Emissions were quantified using CalEEMod.
- **Material handling dust from on-site activities.** Emissions were quantified using CalEEMod.

CalEEMod version 2022.1.1.13 was used to quantify emissions from Phase 2 non-vessel activities (CAPCOA 2022). The CalEEMod model is approved by SCAQMD and is well suited to many land development projects. The model uses emission factors for off-road equipment and on-road vehicles from the CARB emissions inventory and calculates emissions associated with each activity task; overlapping tasks, if any, are added to calculate maximum day emissions for each pollutant.

The activity schedule and equipment utilization, developed and provided by SA Recycling, were used as CalEEMod input and are included in Appendix B, Table A-55, CalEEMod Output. CalEEMod default values were used in instances where equipment utilization was unavailable from the project proponent or LAHD. The analysis assumed EPA Tier 4 off-road engines, which are required by LAHD's SCG as part of the Proposed Project. The actual schedule may differ slightly from the one used in the analysis, but any delay of activities would likely result in lower emissions than what was analyzed due to stricter regulatory standards and the turnover to cleaner engines in future years as compared to the analysis.

CEQA Baseline

The CEQA Baseline is discussed in detail in Section 2.4.7 in Chapter 2, Project Description. In summary, the CEQA Baseline for the Proposed Project is existing operation in Fiscal Year 2021/2022. CEQA Baseline emissions were calculated using the methodology discussed above and are presented in Table 3.1-4 below.

Table 3.1-4. Baseline, Peak Day Emissions (pounds per day)

Source Category	PM_{10}	$PM_{2.5}$	NO_x	SO_x	CO	VOC
Vessels - At Berth	5	5	276	13	25	10
Vessels – Transit	9	8	1,164	25	72	16
Vessels – Anchorage	0	0	0	0	0	0
Tugboats	2	1	54	0	37	3
Trucks	11	4	186	1	33	4
Rail	0	0	6	0	2	0
On-Site Equipment	29	5	87	0	268	6
Worker Vehicles	1	0	1	0	17	1
2021/2022 CEQA Baseline	**57**	**24**	**1,774**	**40**	**454**	**40**

3.1.5 THRESHOLDS OF SIGNIFICANCE

CEQA Guidelines Appendix G (14 CCR 15000–15387) recommends that significance criteria established by the applicable air quality management district or air pollution control district be relied upon to make determinations of significance and recommends consideration of the following in assessing impacts. Would the project:

(a) Conflict with or obstruct implementation of the applicable air quality plan?
(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?
(c) Expose sensitive receptors to substantial pollutant concentrations?
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The Initial Study/Notice of Preparation (IS/NOP) (Appendix A) eliminated CEQA Checklist items (a) and (d) from further consideration. The IS concluded that the Proposed Project would be required to comply with all applicable existing and developing air quality regulations ensuring that the Project's activities would not obstruct implementation of the AQMP or the CAAP. Subsequently, LAHD decided to reconsider item (a) in the SEIR analysis when the Phase 2 Non-operational Restoration activities were added to the Project description. As such, this criterion is discussed in this analysis.

The IS also concluded that odors from operation of the Proposed Project (item d) would be similar to odors produced from the surrounding uses as well as the distance from the nearest sensitive receptors would allow adequate dispersion of emission to below objectionable odor levels; however, a comment letter was received during the 30-day NOP scoping period expressing concern about odors from continued operations; therefore, this criterion is discussed further in this SEIR analysis.

The following criteria for determining the significance of impacts on air quality are based on the above considerations. Cumulative impacts are considered in Chapter 4. The significance thresholds were developed by SCAQMD (SCAQMD 2023). The Proposed Project would have a significant impact related to air quality if it would result in the following:

- AQ-1: Result in new emissions that exceed SCAQMD thresholds of significance in Table 3.1-5.

Table 3.1-5. SCAQMD Regional Thresholds, Peak Day Emissions (pounds/day)

Air Pollutant	Threshold
NOX	55
VOC	55
PM10	150
PM2.5	55
SOX	150
CO	550
Lead	3

Source: SCAQMD 2023 for operational thresholds.
Note: SCAQMD = South Coast Air Quality Management District; NO_x = nitrogen oxides; VOC = volatile organic compound; PM_{10} = particulate matter less than 10 microns in diameter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; SO_x = sulfur oxides; CO = carbon monoxide.

- AQ-2: Result in new ambient air pollutant concentrations that exceed NAAQS or CAAQS.

SCAQMD developed the Localized Significance Thresholds (LST) methodology to assist CEQA lead agencies in analyzing localized air quality impacts from proposed projects (SCAQMD 2009). The LST methodology is a screening methodology that allows users to determine, in lieu of conducting a dispersion modeling analysis, if a project would cause or contribute to an exceedance of the NAAQS or CAAQS. The LST methodology is based on maximum day on-site (i.e., local) emissions, the area over which emissions occur, the ambient air quality in the source receptor area (SRA), and the distance to the nearest exposed individual. The LST is set up as a series of look-up tables for emissions of NO_x, CO, PM_{10}, and $PM_{2.5}$. If proposed on-site emissions are below the LST look-up table emission levels, then the proposed activity is considered not to violate or substantially contribute to an existing or projected air quality standard. SCAQMD's LST methodology was used in this analysis to evaluate ambient air quality impacts from the Proposed Project's on-site activities. The CEQA Baseline was subtracted from Proposed Project emissions, and the incremental on-site emissions, per SCAQMD policy, were compared to the LST thresholds appropriate to the SRA, site acreage, and distance to the nearest receptor (SCAQMD 2009).

The LST analysis was based on a 5-acre area, with the closest residential receptor located 200 meters away, and the closest off-site worker receptor located 50 meters away. LST thresholds are presented in Table 3.1-6.

Table 3.1-6. SCAQMD Localized Significance Thresholds, Peak Day Emissions (pounds/day)

Air Pollutant		
	Residential Receptor	*Off-Site Worker Receptor*
PM10	22	N/A
PM2.5	10	N/A
NO2	141	118
CO	4,184	1,982

Notes: SCAQMD = South Coast Air Quality Management District; PM_{10} = particulate matter less than 10 microns in diameter; N /A = not applicable; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; NO_2 = nitrogen dioxide; CO =S carbon monoxide; LST = Localized Significance Threshold.
SCAQMD LST operational thresholds are based on: 5-acre site

200-meter separation distance to the closest residential/sensitive receptor. This results in a conservative threshold because the actual distance from the facility boundary to the closest receptor at the marina in East Basin is 250 meters and the distance from the stack and truck racks is over 500 meters.
50-meter separation distance to the closest off-site worker receptor.
Source Receptor Area: 4.

- AQ-3: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

  Per SCAQMD's CEQA thresholds (SCAQMD 2023), a project would be considered significant if it would create an odor nuisance pursuant to SCAQMD Rule 402.

- AQ-4: Expose receptors to significant levels of TACs per the following SCAQMD thresholds.
  - Maximum Incremental Cancer Risk (MICR) greater than or equal to 10 in 1 million
  - Noncancer-chronic Hazard Index (HIc) greater than or equal to 1.0
  - Noncancer-acute Hazard Index (HIa) greater than or equal to 1.0
  - Cancer Burden greater than 0.5 excess cancer cases in areas where the maximum incremental cancer risk for residential receptors is greater than 1 in 1 million
- AQ-5: Conflict with or obstruct implementation of an applicable air quality plan.

3.1.6 IMPACT DETERMINATION

3.1.6.1 Impact AQ-1: Would the Proposed Project result in new emissions that exceed an SCAQMD threshold of significance in Table 3.1-5?

Discussion of 1996 Certified EIR Findings

The 1996 Certified EIR calculated emissions based on a throughput of 1.3 million tons and determined that operational activities would exceed thresholds of significance for NO_x, CO, and VOC (1996 Final EIR; 1995 Draft EIR, Section 3.3.4.3). The 1996 Certified EIR concluded that although mitigation measures would reduce emissions, impacts would remain significant and unavoidable for NO_x, CO, and VOC and less than significant for PM_{10} and SO_x. The 1996 Certified EIR did not quantify or make a determination regarding $PM_{2.5}$ because at the time of preparation, SCAQMD had not yet developed a significance threshold for $PM_{2.5}$.

Impacts of the Proposed Project without Mitigation

Phase 1 - Continued Operation

Phase 1 activities would result in criteria pollutant emissions from engine exhaust and fugitive dust, DPM emissions from engine exhaust, and TAC emissions from on-site metal processing. Table 3.1-7 summarizes regional peak day criteria pollutant emissions by source category and shows that the CEQA increment (Proposed Project emissions minus the CEQA Baseline) for all pollutants would be below SCAQMD significance thresholds and that Phase 1 emissions would be less than the CEQA Baseline.

The table shows that truck and worker vehicle emissions would be reduced, in comparison to the CEQA Baseline, as older equipment is replaced with cleaner equipment, per existing regulatory requirements. Although it is anticipated that future tugboat engines would also turnover due to anticipated regulatory action, the analysis conservatively did not take credit for potential reductions. This conservative approach is discussed in Section 3.1.3.3, State Regulations and Agreements, under the discussion of CARB In-Use California Harbor Craft Regulations.

It should also be noted that the analysis calculated emissions for the first year of activity under the proposed 10-year lease and did not take credit for anticipated emission reductions in future years, due to existing regulatory requirements; future emissions were assumed to remain unchanged after the first year of the proposed 10-year lease. This is a conservative approach, as emissions would be reasonably expected to decrease in future years due to more stringent regulatory requirements.

In addition, emissions in Table 3.1-7 are substantially less than emissions calculated in the 1996 Certified EIR. Although the Proposed Project throughput would be 1.2 million tons, which is 92% of the 1.3 million tons assessed in the 1996 Certified EIR, Proposed Project emissions would be substantially less. Proposed Project emissions of PM_{10}, NO_x, SO_x, CO, and VOC would be 12%, 47%, 3%, 20%, and 4% of the 1996 Certified EIR emissions, respectively. The decrease in emissions compared to the 1996 Certified EIR, although due in part to the lower throughput, is primarily attributed to stricter regulatory requirements promoting the use of cleaner engines and sulfur content limits in diesel fuel. Appendix B, Table A-56, presents this comparison.

Phase 2 - Non-operational Restoration

Phase 2 activities would result in criteria pollutant emissions from engine exhaust and fugitive dust, and in DPM emissions from engine exhaust. Table 3.1-7 summarizes regional peak day criteria pollutant emissions by source category and shows that the CEQA increment (Proposed Project emissions minus the CEQA Baseline) for all pollutants would be below SCAQMD significance thresholds and that Phase 2 emissions would be less than the CEQA Baseline.

As discussed in Section 3.1.4, Methodology, Phase 2 non-vessel emissions were calculated, using CalEEMod, for each year of activity. Vessel emissions were calculated using the same methodology used to calculate emissions during Phase 1 activities. Peak day emissions for all pollutants, except PM_{10} in 2035, would occur when one vessel would transit in, hotel at the berth, and be loaded. The vessel would make only one transit in a 24-hour period and would be maneuvered to/from the berth by tugboats. In addition, on-site equipment would be used to transfer metal to the berth and load it to the bucket crane resulting in engine exhaust and dust emissions. Peak day PM_{10} emissions would occur in 2035 as a result of fugitive dust during concrete slab demolition.

Table 3.1-7. Proposed Project Peak Day Emissions (pounds/day)

Source Category	PM_{10}	$PM_{2.5}$	NO_x	SO_x	CO	VOC
2021/2022 Baseline						
Vessels - At Berth	5	5	276	13	25	10
Vessels – Transit	9	8	1,164	25	72	16
Vessels – Anchorage	0	0	0	0	0	0
Tugboats	2	1	54	0	37	3
Trucks	11	4	186	1	33	4
Rail	0	0	6	0	2	0
On-Site Equipment	29	5	87	0	268	6
Worker Vehicles	1	0	1	0	17	1
2021/2022 CEQA Baseline	**57**	**24**	**1,774**	**40**	**454**	**40**
Proposed Project - Phase 1						
Vessels - At Berth	5	5	276	13	25	10
Vessels – Transit	9	8	1,164	25	72	16
Vessels – Anchorage	0	0	0	0	0	0

Table 3.1-7. Proposed Project Peak Day Emissions (pounds/day)

Source Category	PM_{10}	$PM_{2.5}$	NO_x	SO_x	CO	VOC
Tugboats	2	1	54	0	37	3
Trucks	10	3	89	1	12	1
Rail	0	0	6	0	2	0
On-Site Equipment	29	5	87	0	268	6
Worker Vehicles	1	0	1	0	15	1
Proposed Project - Phase 1	**56**	**24**	**1,677**	**40**	**432**	**36**
CEQA Impacts - Phase 1						
CEQA Threshold	*150*	*55*	*55*	*150*	*550*	*55*
CEQA Increment	*-1*	*0*	*-98*	*0*	*-22*	*-3*
CEQA Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*
Proposed Project - Phase 2						
2034 Equipment Exhaust, Vehicle Exhaust, Dust	0.6	0.2	2.4	0.0	25.3	0.6
2035 Equipment Exhaust, Vehicle Exhaust, Dust	15.6	2.5	8.6	0.1	30.7	0.6
2035 Shipping Emissions						
Vessels - At Berth	5	5	276	13	25	10
Vessels – Transit	6	5	738	16	46	10
Vessels – Anchorage	0	0	0	0	0	0
Tugboats	1	1	33	0	23	2
Equipment Exhaust, Vehicle Exhaust, Dust - During Shipping	0	0	3	0	27	1
2036 Equipment Exhaust, Vehicle Exhaust, Dust	3	1	8	0	11	0
2037 Equipment Exhaust, Vehicle Exhaust, Dust	4	1	8	0	11	0
Proposed Project - Phase 2 (maximum of all years)	**16**	**11**	**1,050**	**29**	**120**	**22**
CEQA Impacts - Phase 2						
CEQA Threshold	*150*	*55*	*55*	*150*	*550*	*55*
CEQA Increment	*-41*	*-13*	*-725*	*-11*	*-334*	*-18*
CEQA Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Notes: PM_{10} = particulate matter less than 10 microns in diameter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; NO_x = nitrogen oxides; SO_x = sulfur oxides; CO = carbon monoxide; VOC = volatile organic compound; CEQA = California Environmental Quality Act; SCAQMD = South Coast Air Quality Management District.
Emissions may not add exactly due to rounding.
CEQA thresholds reflect SCAQMD's operational thresholds.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project would not result in any new significant impacts or in a substantial increase in the severity of previously identified impacts under Impact AQ-1.

3.1.6.2 Impact AQ-2: Would the Proposed Project result in new ambient air pollutant concentrations that exceed NAAQS or CAAQS or exceed an SCAQMD LST emissions threshold in Table 3.1-6?

Discussion of 1996 Certified EIR Findings

The 1996 Certified EIR qualitatively evaluated impacts to ambient air quality by observing that the Project, as part of Port expansion plans, was included in the emissions inventory forecasts that were used to develop the 1991 AQMP, the most recent AQMP at the time. The 1996 Certified EIR concluded that the Project would be consistent with the 1991 AQMP and would therefore not interfere with the attainment of ambient air quality standards.

Impacts of the Proposed Project without Mitigation

Phase 1 - Continued Operation

Methodology used to assess ambient air quality in the SCAB has changed since the time of the 1996 Certified EIR. SCAQMD recommends that projects quantitively evaluate potential impacts to ambient air quality by either conducting dispersion modeling or using SCAQMD's screening LST methodology described in Section 3.1.5.

Table 3.1-8 summarizes on-site Phase 1 peak day criteria pollutant emissions by source category and shows that the CEQA increment (Proposed Project emissions minus the CEQA Baseline) for all pollutants would be below SCAQMD's LST thresholds and that Phase 1 emissions would be either equal to or less than the CEQA Baseline.

Phase 2 - Non-operational Restoration

Table 3.1-8 summarizes on-site Phase 2 peak day criteria pollutant emissions by source category and shows that the CEQA increment (Proposed Project emissions minus the CEQA Baseline) for all pollutants would be below SCAQMD's LST thresholds and that Phase 2 emissions would be less than the CEQA Baseline.

Table 3.1-8. Proposed Project On-Site Peak Day Emissions (pounds/day)

Year	Peak Day Emissions – Residential				Peak Day Emissions - Occupational	
	PM_{10}	$PM_{2.5}$	NO_2	CO	NO_2	CO
2021/2022 Baseline						
Vessels at Berth	7	6	371	34	371	34
Tugboats at Berth	0	0	12	8	12	8
Trucks	1	0	7	0	7	0
Rail	0	0	2	1	2	1
On-Site Equipment	29	5	87	268	87	268
2021/2022 Baseline	**37**	**12**	**478**	**311**	**478**	**311**
Proposed Project - Phase 1						
Vessels at Berth	7	6	371	34	371	34
Tugboats at Berth	0	0	12	8	12	8
Trucks	1	0	5	0	5	0

Table 3.1-8. Proposed Project On-Site Peak Day Emissions (pounds/day)

Year	Peak Day Emissions – Residential				Peak Day Emissions - Occupational	
	PM_{10}	*$PM_{2.5}$*	*NO_2*	*CO*	*NO_2*	*CO*
Rail	0	0	2	1	2	1
On-Site Equipment	29	5	87	268	87	268
Proposed Project - Phase 1	**37**	**12**	**476**	**311**	**476**	**311**
CEQA Impacts - Phase 1						
LST Threshold	*22*	*10*	*141*	*4,184*	*118*	*1,982*
CEQA Increment	0	0	-2	0	-2	0
CEQA Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*
Proposed Project - Phase 2						
2034 Equipment Exhaust, Vehicle Exhaust, Dust	0	0	2	23	2	23
2035 Equipment Exhaust, Vehicle Exhaust, Dust	16	2	3	30	3	30
2035 Shipping Activities						
Vessels - At Berth	5	5	276	25	276	25
Tugboats - At Berth	0	0	12	8	12	8
Equipment Exhaust, Vehicle Exhaust, Dust	0	0	3	26	3	26
2036 Equipment Exhaust, Vehicle Exhaust, Dust	2	1	1	10	1	10
2037 Equipment Exhaust, Vehicle Exhaust, Dust	2	1	1	10	1	10
Proposed Project - Phase 2	**16**	**5**	**291**	**60**	**291**	**60**
CEQA Impacts - Phase 2						
LST Threshold	*22*	*10*	*141*	4,184	*118*	*1,982*
CEQA Increment	*-22*	*-7*	*-188*	*-251*	*-188*	*-251*
CEQA Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Notes: PM_{10} = particulate matter less than 10 microns in diameter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; NO_2 = nitrogen dioxide; CO = carbon monoxide; CEQA = California Environmental Quality Act; LST = Localized Significance Threshold; SCAQMD = South Coast Air Quality Management District

SCAQMD LST thresholds are based on:

5-acre site.

200-meter separation distance to the closest residential/sensitive receptor. This results in a conservative threshold because the actual distance from the facility boundary to the closest receptor at the marina in East Basin is 250 meters and the distance from the stack and truck racks is over 500 meters.

50-meter separation distance to the closest off-site worker receptor.

Source Receptor Area: 4.

PM_{10} and $PM_{2.5}$ LST thresholds are relevant to sensitive receptors reasonably likely to be present for 24 hours or more. Since off-site worker receptors are not expected to be present for this duration, significance for particulates has been omitted for off-site worker receptors.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project would not result in any new significant impacts or in a substantial increase in previously identified impacts under Impact AQ-2.

3.1.6.3 Impact AQ-3: Would the Proposed Project result in other emissions (such as those leading to odors) that adversely affect a substantial number of people?

Discussion of 1996 Certified EIR Findings

The 1996 Certified EIR concluded that any potential odors would be intermittent, typical of a highly industrialized area, and that impacts would be less than significant.

Impacts of the Proposed Project without Mitigation

Projects that use diesel and gasoline fuels may have the potential to generate odors. Some individuals may sense that diesel and gasoline emissions are objectionable. The Proposed Project would be considered significant if it would result in odors that would adversely affect a substantial number of people by creating a nuisance under SCAQMD Rule 402.

The existing industrial setting of the Proposed Project represents an already complex odor environment. Odors from Phase 1 and Phase 2 activities of the Proposed Project would be similar to odors produced from existing industrial activities and would be primarily associated with vessels berthed at the terminal and on-site mobile equipment exhaust. Within this context, the Proposed Project would not likely result in changes to the overall odor environment in the vicinity. The distances between Proposed Project emission sources and the nearest sensitive receptors, possible residents at the marina in the East Basin are far enough away to allow for adequate dispersion of these emissions to below objectionable odor levels.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project would not result in any new significant impacts or in a substantial increase than previously analyzed under Impact AQ-3.

3.1.6.4 Impact AQ-4: Would the Proposed Project expose receptors to significant levels of TACs per SCAQMD thresholds?

Discussion of 1996 Certified EIR Findings

The 1996 Certified EIR determined that activities would result in less-than-significant impacts for cancer risk, non-cancer chronic effects, and non-cancer acute effects at both sensitive and off-site worker receptors. Table 3.8-6 of the 1995 Draft EIR presents this information.

Impacts of the Proposed Project without Mitigation

Phase 1 – Continued Operation

Phase 1 activities would result in emissions from engine exhaust in the form of DPM and TAC emissions from on-site metal processing/handling. Phase 1 throughput and source activity would not change from the CEQA Baseline. Corresponding TAC emissions would also not change compared to the CEQA Baseline or in the case of DPM be lower than the CEQA Baseline as equipment engines turnover to cleaner engines or are electrified due to stricter regulatory requirements.

Phase 2 – Non-operational Restoration

Phase 2 activities would result in DPM emissions from engine exhaust. The greatest source of these emissions on site would be non-vessel activities, such as the dismantling of metal structures, concrete slab and foundation demolition, export of debris and soil, and import of clean cover. These emissions would be substantially less than Phase 1 non-vessel emissions. In addition, Phase 2 would require the use of only 1 vessel over the course of 1 day, compared to 28 annual vessels associated with Phase 1 and the CEQA Baseline. Therefore, Phase 2 activities would be considerably less intensive and result in substantially lower DPM emissions than both Phase 1 activities and the CEQA Baseline.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project would not result in any new significant impacts or in a substantial increase in previously identified impacts under Impact AQ-4.

3.1.6.5 Impact AQ-5: Would the Proposed Project conflict with or obstruct implementation of an applicable air quality plan?

Discussion of 1996 Certified EIR Findings

The 1996 Certified EIR determined that the Project, as part of Port expansion plans, was included in the emissions inventory forecasts that were used to develop the 1991 AQMP, the most recent AQMP at the time. The 1996 Certified EIR concluded that the Project would be consistent with the 1991 AQMP.

Impacts of the Proposed Project without Mitigation

Phase 1 and Phase 2 activities would result in emissions of nonattainment criteria pollutants, primarily from diesel combustion exhaust in vessels, tugboats, trucks, and on-site equipment. SCAQMD periodically updates the AQMP; the most recent update was adopted in December 2022 (SCAQMD 2022). The 2022 AQMP and prior iterations include emission reduction measures that are designed to bring the SCAB into attainment of the state and national ambient air quality standards. The 2022 AQMP contains attainment strategies that include mobile source control measures and clean fuel projects that are enforced at the state and federal levels on engine manufacturers and petroleum refiners and retailers. Phase 1 and Phase 2 activities would comply with these control measures. SCAQMD also adopts AQMP control measures into the SCAQMD rules and regulations, which are then used to regulate sources of air pollution in the SCAB. Compliance with these requirements would further ensure that the Phase 1 and Phase 2 activities would not obstruct implementation of the AQMP.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project would not result in any new significant impacts or in a substantial increase in previously identified impacts under Impact AQ-5.

3.1.6.7 Summary of Impact Determinations

Table 3.1-9 summarizes the impact determinations of the Proposed Project related to air quality and meteorology. This table is meant to allow for an easy comparison of the potential impacts of the Proposed Project with respect to this resource. Identified potential impacts may be based on federal, state, or City of Los Angeles significance criteria, LAHD criteria, and the scientific judgment of the report preparers.

For each type of potential impact, the table describes the impact, notes the impact determinations, describes any applicable mitigation measures, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

Table 3.1-9. Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts After Mitigation
Impact AQ-1: Would the Proposed Project result in new emissions that exceed an SCAQMD threshold of significance in Table 3.1-5?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact AQ-2: Would the Proposed Project result in new ambient air pollutant concentrations that exceed NAAQS or CAAQS or exceed an SCAQMD LST emissions threshold in Table 3.1-6?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact AQ-3: Would the Proposed Project result in other emissions (such as those leading to odors) that adversely affect a substantial number of people?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact AQ-4: Would the Proposed Project expose receptors to significant levels of TACs per SCAQMD thresholds?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur
Impact AQ-5: Would the Proposed Project conflict with or obstruct implementation of an applicable air quality plan?	No new or substantially more severe significant impacts would occur	No mitigation is required.	No new or substantially more severe significant impacts would occur

Impacts were found to be significant in the 1996 Certified EIR, and based on this analysis presented here, there would be no new or more substantial impacts than what was previously found in the 1996 Certified EIR.

3.1.7 SIGNIFICANT UNAVOIDABLE IMPACTS

3.1.7.1 Phase 1 - Continued Operation

There would be no new significant and unavoidable impacts or a substantial increase in the severity of previously identified effects.

3.1.7.2 Phase 2 - Non-operational Restoration

There would be no new significant and unavoidable impacts or a substantial increase in the severity of previously identified effects.

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Section 3.2

Cultural Resources

Summary of Section

This section addresses whether activities associated with the Proposed Project may impact cultural resources. This section includes the following:

- A description of the existing cultural resource conditions in the Proposed Project area;
- A discussion of the regulations and policies regarding cultural resources that are applicable to the Proposed Project;
- A discussion of the analysis methodology;
- A summary of the 1996 Certified EIR findings;
- Potential impacts to cultural resources associated with Proposed Project activities;
- A description of any applicable mitigation measures or standard conditions of approval proposed, as applicable; and
- Residual impacts after mitigation and significance under CEQA.

Key Points

Cultural Resources were scoped out of the 1996 Certified EIR.

Historic Resources

No new significant impacts or substantially more severe impacts than those previously identified would occur to historic resources during the Phase 1 - Continued Operations period because no structures would be altered, modified or demolished during this phase. Current operations would continue in an existing industrial facility that is already paved and highly disturbed.

Although the Phase 2 – Non-operational Restoration Period would involve the demolition/dismantling of all onsite structures and buildings, no historic resources are known to exist in the Proposed Project area and the area is ineligible as a historic resource under CEQA. Thus, no known historic resources would be disturbed or impacted as a result of the Proposed Project.

Archeological Resources

No new impacts or substantially more severe impacts than previously identified would occur to archeological resources during the Phase 1 - Continued Operations period because no subsurface disturbance would occur.

No new significant impacts or substantially more severe impacts than previously identified would occur to archeological resources during the Phase 2 – Non-operational Restoration period with adherence to applicable regulatory requirements.

Paleontological Resources or Unique Geological Features

No new significant impacts or substantially more severe impacts than those previously analyzed would occur to paleontological resources or unique during the Phase 1 - Continued Operations period because no subsurface disturbance would occur.

No new significant impacts or substantially more severe impacts than those previously analyzed would occur to paleontological resources during the Phase 2 – Non-operational Restoration Period as no prehistoric sites have been identified in the Project site or within a 0.25-mile radius of the site. Furthermore, the geologic formation within the Project site is human-made artificial fill created in the twentieth century, which has extensive previous construction activity that likely destroyed any unique resources and features, and the Project excavation would not occur on any geologic layer that could yield unique resources.

Human Remains

No new impacts or substantially more severe impacts than those previously identified would occur during the Phase 1 - Continuing Operations because no subsurface disturbance would occur.

No new or substantially more severe impacts than those previously identified would occur relating to the inadvertent discovery of human remains during Phase 2 - Non-operational Restoration Period with adherence to applicable regulatory requirements.

Mitigation measures are not required.

Standard conditions of approval have been added to the Proposed Project

The Proposed Project would not result in any new or substantially more severe significant impacts to cultural resources.

3.2.1 INTRODUCTION

This section of the Draft SEIR describes existing cultural resources conditions of the Proposed Project, identifies associated regulatory requirements, evaluates potential impacts on cultural resources that could result from implementation of the Proposed Project, and determines if mitigation measures are required for the implementation of the Proposed Project.

The following analysis is based, in part, on the following sources that address cultural resources:

- Previously certified environmental documents:
  - Hugo Neu-Proler Lease Renewal Project Draft EIR, 1995 (SCH No. 93071074)
  - SA Recycling Crane Replacement and Electrification Project Final Initial Study/Negative Declaration, 2016 (SCH No. 2016021009)
- Other documents reviewed:
  - Built Environment Evaluation Report for Properties on Terminal Island, Port of Los Angeles, California (SWCA 2011)

3.2.2 EXISTING CONDITIONS

Relevant information gleaned from the documents listed above and employed to inform the potential for impacts to cultural resources is summarized below.

Hugo Neu-Proler Lease Renewal Project Draft EIR, 1995 (SCH No. 93071074)

Cultural resources were scoped out of the 1996 Certified EIR; however, Section 3.1, Geology, of the 1995 Draft EIR includes a discussion of the subsurface conditions of the Proposed Project site. The consideration of subsurface conditions within a study area provides insight into the potential to

encounter subsurface intact cultural resources when reviewed against the proposed depths of construction activities for a project.

Section 3.1.1.3, Landfilled Materials of the 1996 Certified EIR stated that Terminal Island was subject to landfilling activities in the early 1900s. The sediment used to create Terminal Island was acquired through dredging the Dominguez Channel, located northeast of the Proposed Project site. Additionally, the Cerritos Channel, located immediately north of the present Proposed Project site, was constructed between Terminal Island and the mainland. The landfill that was placed within the Proposed Project site in the 1940s was documented in a site characterization report prepared in 1989 by Envirosphere, Inc. According to the 1996 Certified EIR, informed by the Envirosphere report, the landfill soils are characterized as consisting of gray to brown, fine to medium grained sand and silty sand with varying percentages of the shell fragments and mica between 5 to 10 feet in thickness (Envirosphere, Inc. 1989). In addition to the 1989 report, the 1996 Certified EIR also includes information from an environmental soils study completed in 1991 by Environmental Audit, Inc. According to the 1991 report, soil sampling was performed employing five trenches within the Proposed Project site varying in depth between 3.7 and 5.8 feet below surface. Soils encountered within each trench included between 4 to 12 inches of dark brown soil overlying up to 46 inches of beach sand. Underlying the beach sand is a "marine layer" defined as dredged soil used to construct the area that includes the Proposed Project site (Environmental Audit, Inc. 1991). The 1991 report further stated that the materials identified as overlying the beach sand/marine layer represent are a result of activities that occurred since the landfill soils were placed in the 1940s.

Based on the information above, the Proposed Project site is underlain with non-native landfill materials that extend from surface to depths between 4 to 10 feet. Current Proposed Project ground disturbing activities during the Phase 2 Nonoperational Restoration period involve the demolition of flat slabs and foundations to an average depth of 16 to 18 inches, and removal of contaminated soils with assumed maximum depths between 2 to 4 feet across the entire Proposed Project site. This suggests that the demolition and soil removal activities would occur within landfill soils (non-native and disturbed soils).

SA Recycling Crane Replacement and Electrification Project Final Initial Study/Negative Declaration, 2016 (SCH No. 2016021009)

Cultural resources were addressed in this previously certified Initial Study/Negative Declaration. The project analyzed within this environmental document involved infrastructure improvements, including the replacement of an existing diesel crane within the SA Recycling facility and Berths 210 and 211; both are within the present Proposed Project site. According to the proposed construction improvements, the project did not involve any demolition of existing structures. However, the proposed improvements necessitated the removal of concrete and trenching down approximately 3 feet from grade, for the installation of conduit and replacement of the removed concrete.

According to the impacts analysis for cultural resources, specifically assessing historical resources, no impacts were identified and no mitigation was required as it was determined that no historic[al] resources were identified within the site. Analysis conducted related to considering adverse impacts to archaeological resources, determined that since the project site was located on an existing industrial site and the limited proposed ground disturbance associated with the trenching activities for the installation of conduit (approximately 3 feet in depth), there was very little potential to encounter archaeological resources during project implementation. The analysis also determined that while the potential for unknown buried resources are unlikely, archaeological resources have been previously encountered within the Port of Los Angeles (Port or POLA). As a result, in lieu of mitigation measures, existing regulatory CEQA Guidelines (CCR Title 14, Section 15064.5) were referenced to ensure potential impacts to archaeological resources would be a less than significant. In addition to this

existing regulation, the Initial Study/Negative Declaration referred to the construction specifications, which require that if potentially significant cultural resources (50 years or older) are encountered during construction, construction in the area of the discovery shall immediately cease until authorized to resume by the engineer based on assessment, evaluation and imposed treatment by a qualified archaeologist in accordance with 36 CFR 800.11.1 and California Code of Regulations Title 14, Section 15064.5 (f).

Built Environment Evaluation Report for Properties on Terminal Island, Port of Los Angeles, California (SWCA 2011)

This report specifically addresses built environment resources on Terminal Island, including built resources within the present Proposed Project site, and provides a historic context. The information contained in the 2011 report is referenced in this section of the Draft SEIR, where appropriate, to inform on the analysis of historical resources. The study found the property present within the Proposed Project site ineligible for inclusion in the California Register of Historical Resources (CRHR or California Register) or the National Register of Historic Places (NRHP) but did not evaluate the property at the local level for eligibility as a City of Los Angeles Historic-Cultural Monument (LAHCM). Archaeological resources were not addressed in the 2011 report.

Summary

The Proposed Project site encompasses approximately 26.7 acres of waterfront and backland property at Berths 210 and 211 on Terminal Island (Proposed Project site). The Proposed Project site currently consists of an Office Building, Warehouse, Maintenance Shop, Motor Room, Shear Room, Shaker/Plate rooms, and two Covered Secondary Containment areas. Since the publication of the Proposed Project's Initial Study/Notice of Preparation (IS/NOP) (Appendix A), the Los Angeles Harbor Department (LAHD) has added restoration of the Proposed Project site through the demolition/dismantling of all on-site structures and buildings, removal of all pavement, excavation of soil from the site and restoration of the site. The Proposed Project would consist of two phases as follows: Phase 1 – Continued Operation, which would not involve the alteration, modification, or demolition of structures as no ground disturbing activities are anticipated. Current operations would continue in an existing industrial facility that is already paved and highly disturbed. Phase 2 – Non-Operational Restoration Period, as it pertains to ground disturbing activities, would involve the dismantling of the facility structures, demolition of flat slab concrete, pavement and foundations, and removal of hazardous (contaminated) soils.

The depth of ground disturbing activities involved with Phase 2 are as follows: an average depth of disturbance of 16 inches for the flat slab demolition work; an average depth of disturbance of 18 inches for the demolition of foundations; and an assumed maximum depth between 2 to 4 feet for the removal of contaminated soils.

The following section describes the existing conditions on the Proposed Project site, including its environmental and cultural setting and the results of the California Historical Resources Information System (CHRIS).

3.2.3 ENVIRONMENTAL SETTING

The Proposed Project site is located on Terminal Island, a primarily human-made area (made from imported/modern soils) initially developed around the early 1900s and incrementally based on the various demands of the Port. The Proposed Project site is within POLA in the City of Los Angeles, which is adjacent to the communities of San Pedro and Wilmington, and approximately 20 miles south of downtown Los Angeles (Figure 2-1, Regional Location). The Proposed Project site is generally bound

on the north by the East Basin Channel and Cerritos Channel, one the east by the Pasha Stevedoring Terminal, on the south by N. Seaside Avenue, and on the west by the Yusen Container Terminal.

3.2.3.1 Prehistoric Setting and Ethnographic Overview

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769). A detailed discussion of these time periods and the cultural resources dating from these periods was prepared by Dudek in a Memorandum of the Prehistoric and Ethnographic Setting (Dudek 2023). The Memorandum is on file with the LAHD.

3.2.3.2 Historic Setting

The following historic contexts are entirely based on the SWCA Report (SWCA 2011).

Early Harbor Development, 1771 – 1896

The Port began as a quiet natural harbor ringed with Gabrieleno villages. The establishment of the Mission San Gabriel Arcángel in 1771 brought the first to European development to the area (which was named San Pedro by that point). In the years that followed, members of the Portola Expedition were granted a series of land concessions in southern California, including the Rancho San Pedro, Rancho Los Cerritos, and Rancho Palos Verdes land grants which included the area of the present-day Port.

Within the Rancho San Pedro land grant was a sandy strip known in the mid to late nineteenth century as Rattlesnake Island. The island served as a natural breakwater protecting the mainland shore from errant waves and was a key component of the harbor. Owned by the Dominguez estate, it remained a largely undeveloped piece of land until the early 1890s.

In 1834, the Mexican government amended the Rancho San Pedro land grant to give a portion to the Sepulveda family, who subsequently built a dock and landing at the harbor. By the time California joined the United States in 1848, San Pedro was well established as a port of trade and a transportation hub.

Delaware native Phineas Banning arrived in San Pedro in 1851 and proceeded to spearhead much of the Port's development. After founding the town of New San Pedro (later renamed Wilmington) in 1857, Banning organized the Los Angeles and San Pedro Railroad, the first line to transport goods from the harbor to the city of Los Angeles. In 1871, Banning's political efforts resulted in Congressional approval of funds for major harbor improvements.

In the late 1880s to 1890s, the Los Angeles Terminal Railway purchased Rattlesnake Island from the Dominguez estate and constructed a new line along the Los Angeles River. From this point on, the island was known as Terminal Island (SWCA 2011).

Development and Occupation of the Harbor and Terminal Island, 1897–1918

By the latter part of the nineteenth century, the need for a deep-water port in the Los Angeles region had become increasingly urgent, and the federal government agreed to assist the City with a $3 million appropriation for its development. In 1897 the Board of Army Engineers finally decided that the harbor would be built at San Pedro.

The rapidly growing oil industry played a major part in Port activity during this period. As early as 1902, the Union Oil Company had a crude oil storage facility on the west bank of Terminal Island. By 1908, additional dredged fill provided Union Oil with enough surrounding land to construct five new storage tanks.

The growth of industrial facilities on Terminal Island was in large part due to the constantly expanding rail networks within the Port. In 1900, the Los Angeles and San Pedro Railroad purchased the Los Angeles Terminal Railway and integrated Terminal Island's rail facilities with the harbor's larger network. Its growth was further strengthened when the Union Pacific Railroad acquired the Los Angeles and Salt Lake Railroad.

Simultaneous with growth at the Port, Long Beach began industrial development of its harbor in 1906. The City of Long Beach annexed the east half of Terminal Island in 1907. In 1910, Southern California Edison constructed the region's first high-pressure steam turbine-operated electric generating station on the east end of Terminal Island.

Industrial development of the harbor proceeded apace in the early 1900s, in anticipation of the 1914 completion of the Panama Canal. The City of Los Angeles extended it boundaries to coastal tidewaters, annexing San Pedro in 1906 and Wilmington in 1909. In 1907, the City officially created the Los Angeles Harbor Commission and the Port of Los Angeles. The Port added a significant amount of dredged fill to the south side of Terminal Island. In 1914, the Port began dredging what would become Fish Harbor, a specialized area for fish processing and canning at Terminal Island. It was operational by 1915. The workforce was ethnically diverse and included Japanese, Italians, Mexicans, and Yugoslavian people. Many workers lived on the island, often in the old Brighton Beach area (generally called Terminal Island). The latter residential area was predominantly occupied by first and second generation (issei and Nisei, respectively) Japanese and Japanese Americans, who formed a distinctive island community.

World War I – World War II, 1919 - 1945

Only a few days before the official opening of the Panama Canal, World War I began in 1914, and the canal remained closed for the duration and several years afterward. The primary focus of the Port quickly changed, and every effort was devoted to winning the war. The U.S. Navy developed a base and training station in San Pedro. In addition, the Ports of both Los Angeles and Long Beach turned to shipbuilding. With the end of World War I, development of the Port increased rapidly. The Board of Harbor Commissioners began a number of improvement projects. Terminal Island nearly doubled in size. Deadman's Island, which had long been a shipping hazard at the mouth of the Main Channel, was dynamited. Its debris was combined with dredged fill to create the rectangular parcel now known as Reservation Point at the southwest corner of Terminal Island. New landfill on the east side of the Los Angeles portion of Terminal Island resulted in additional transportation options for the Port. Allen Field opened on June 20, 1928, as California's first combined land and sea airport, which included an oil-surfaced runway, a pier, and seaplane runway. In 1935, the U.S. Navy signed a 30-year lease with the Port. Another significant improvement that followed the end of World War I and the further development of Terminal Island was the initial planning and construction of a sewage system within the Port. These systems were necessary not only to accommodate a larger workforce, but also to process the waste of the growing fishing industry, which was rapidly polluting the bay. The ongoing

development and industrialization of the Port created the need for other improvements as well. Fire protection services were limited in the first 10 years following the City annexation of the harbor area. Within 3 years, fire protection at the Port had grown to include three fire boats, 10 land-based fire companies, and 205 firemen. The discovery of oilfields around the local basin in 1923 led to oil production becoming one of the largest contributors to Port commerce. Large regional companies like Standard Oil of California and Union Oil Company dominated Port production. On Terminal Island, the General Petroleum Corporation established a new storage facility at Berths 238–239.

Collectively, the improvements of the 1920s enabled Port commerce to expand into new import and export areas and strengthened the already robust businesses of oil, lumber, fish, and citrus. The varied shipping of products gave rise to direct trade with Asian markets and signaled a major shift to truck transportation of goods in addition to rail transportation.

With the crash of the stock market in 1929, commerce at the Port slowed greatly. While, harbor improvements were scaled back during the Great Depression, they continued nonetheless, assisted in part by the federal government's Works Progress Administration. Maintenance increased temporarily in 1933 as workers repaired damage from the Long Beach Earthquake.

On Terminal Island, several projects continued through the Great Depression, including the completion of the Terminal Island Treatment Plant in 1935 and improvements at Reeves Field in 1936.

Containerization and Other Postwar Developments, 1946 - Present

Following the end of World War II, the Port shifted gears once again as the military presence on Terminal Island scaled down. Over time, the small shipyards in the Port ceased operation completely. Commercial operations like metal scrapyards businesses occupied newly cleared areas of Terminal Island.

The Board of Harbor Commissioners launched a broad restoration program that included improving and constructing a number of facilities. One such improvement project was the Cannery Street Project, which in the early 1950s widened Cannery Street and repaved additional streets surrounding Fish Harbor.

Long Beach Harbor made a series of improvements to the east side of Terminal Island during this period. By 1947, Long Beach constructed a large breakwater along their portion of the southern shore of Terminal Island. The breakwater provided Long Beach Harbor with additional protected wharf space.

Oil continued to be a major source of revenue for the Port and a number of projects were undertaken in the following years to increase the harbor's storage capabilities for the product. In 1959, the Board of Harbor Commissioners completed the world's first completely protected supertanker terminal. The Mobil Oil Company constructed the world's largest pipeline across the Main Channel to its new tank farm on Terminal Island along Pilchard Street between 1961 and 1962.

The surge in business during this period led to the 1959 approval of a measure authorizing the Los Angeles Harbor Department to finance harbor improvements with revenue bonds. This lead to a large-scale replacement or renovation of older terminals. These improvements were carried out just in time for the advent of containerization, an innovation in which cargo is stored and moved from place to place in large, standardized containers. Containerization resulted in a significant change to the Port's operations. It required changes in port infrastructure: enormous cranes were built to move cargo, and wharves had to be substantially modified, enlarged, and strengthened to support the heavy, stacked cargo containers now being used at the Port.

Some of the Port's most visible resources were constructed during the 1960s, including the Vincent Thomas Bridge, which was built in 1963. In 1965, the Indies Terminal was completed on the Terminal

Island side of the Main Channel. By the late 1960s, the Ports of Los Angeles and Long Beach had converted their shipping infrastructure to adapt to containerization. This conversion resulted in significant and widespread changes to Terminal Island's built environment.

The 1960s also marked the beginning of the Fish Harbor cannery decline. By 1975, most of the Port's canneries had been bought out by multinational corporations, and by the mid-1980s many of their operations had moved out of Los Angeles.

While Terminal Island became heavily industrialized following World War II, a number of recreational facilities remained on the island into the following decades. The Los Angeles Yacht Club occupied its clubhouse at Fish Harbor for more than 65 years before moving to San Pedro in 1993.

Port development continued over the years, dominated by dredging the Main Channel to accommodate ever-larger cargo ships, and by constructing new container terminals. Multiple dredging and filling events led to significant physical changes at Terminal Island. The need for a harbor railhead closer to the harbor was met in the mid-1980s by the construction of the Intermodal Container Transfer Facility. The completion of the Terminal Island Container Transfer Facility in 1997 and the Alameda Corridor in 2002 also facilitated rail shipping.

Today, the Port constitutes a massive shipping center with multiple types of industrial and commercial occupants. Largely as a result of the conversion to containerization in the 1960s, much of the harbor's older historic character has been lost, and pre-1960s resources are increasingly scarce. However, one of this area's primary character-defining elements is its tendency to change and develop within an industrial context.

3.2.4 REGULATORY SETTING

3.2.4.1 Federal Regulations

The NRHP is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP.[1] For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

[1] The NRHP concepts of significance and integrity provide the foundation for evaluating resources for potential listing in the CRHR, as well as local registers of historic resources. While there are differences between the federal, state, and various local registers, there are sufficient similarities that make the preparation of evaluations under all three criteria (if all three criteria are applicable) a more efficient approach to managing resources and for planning purposes. Like many state and local agency projects, the current Proposed Project does not have a federal nexus and, therefore, there is no statutory or regulatory requirement for resource evaluations under NRHP criteria. However, by preparing a NRHP evaluation, the agency has an important planning tool warranting consideration in subsequent or future projects in the same area that have a federal nexus and will require the evaluation of the resource in accordance with the NRHP criteria outlined in 36 CFR § 60.4.

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects with integrity of location, design, setting, materials, workmanship, feeling, and association, and:

a. That are associated with events that have made a significant contribution to the broad patterns of our history; or
b. That are associated with the lives of persons significant in our past; or
c. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
d. That have yielded, or may be likely to yield, information important in prehistory or history.

In addition to significance, a resource must also possess integrity. Integrity is defined in NRHP Bulletin 15, "How to Apply the National Register Criteria for Evaluation," as "the ability of a property to convey its significance (NPS 1997, p. 44). The integrity evaluation is grounded in understanding a property's physical features and how they relate to the property's significance. Historic properties either retain integrity (that is, convey their significance), or they do not. To maintain integrity, a property will always possess several, and usually most, of the seven aspects of integrity (NPS 1997,pp 44-45):

a. **Location** is where the historic property was constructed or where the historic event occurred.
b. **Design** is the combination of elements that create the form, plan, space, structure, and style.
c. **Setting** is the physical environment of a historic property.
d. **Materials** are the physical elements combined or deposited during a particular period and in a specific pattern or configuration to form a historic property.
e. **Workmanship** is the physical evidence of crafts of a particular culture or people during any period in history or prehistory.
f. **Feeling** is the property's expression of a particular period's aesthetic or historic sense.
g. **Association** is the direct link between an important historic event or person and a historic property.

3.2.4.2 State Regulations

California Environmental Quality Act (CEQA)

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a Proposed Project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (California Public Resources Code Section 21083.2). If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (California Public Resources Code Section 21083.2[a]; CEQA Guidelines Section 15064.5[c][4]).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines Section 15064.5[b][1]; California Public Resource Code Section 5020.1[q]). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

1. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant (CEQA Guidelines Section 15064.5[b][3]).

California Register of Historical Resources

The CRHR (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (California PRC Section 5024.1[a]). The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation. The criteria for eligibility for the California Register are based upon National Register criteria (California Public Resources Code Section 5024.1[b]). Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Health and Safety Code Section 7050.5

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

California Public Resources Code (PRC)

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject.

Assembly Bill 52

California Assembly Bill (AB) 52, which took effect July 1, 2015, establishes a consultation process between California Native American Tribes and lead agencies to address tribal concerns regarding project impacts to "tribal cultural resources" (TCRs) and mitigation for such impacts. Public Resources Code PRC Section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either:

- Listed or eligible for listing in the CRHR or a local register of historical resources, or
- Determined by a lead agency to be a TCR.

LAHD sent certified AB 52 letters on November 25, 2019, to the Gabrieleno Band of Mission Indians-Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino-Tongva Tribe, and Gabrielino-Tongva Tribe. No responses were received within the 30-day consultation request period. To date, no TCRs have been identified in the Proposed Project area by the NAHC or local tribes.

3.2.4.3 Local Regulations

Los Angeles Historic Cultural Monuments

The City of Los Angeles has a historic preservation ordinance in place (Los Angeles Municipal Code, Section 22.17.7) for the designation of historical resources, called Historic Cultural Monuments (HCMs). An HCM is any site (including significant trees or other plant life located on the site), building

or structure of particular historic or cultural significance to the City of Los Angeles. A proposed HCM may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Los Angeles Historic Preservation Overlay Zones

As described by the City of Los Angeles Office of Historic Resources, the Historic Preservation Overlay Zone (HPOZ) Ordinance was adopted in 1979 and amended in 2004:

> *to identify and protect neighborhoods with distinct architectural and cultural resources, the City…developed an expansive program of Historic Preservation Overlay Zones . . . HPOZs, commonly known as historic districts, provide for review of proposed exterior alterations and additions to historic properties within designated districts.*

Regarding HPOZ eligibility, City of Los Angeles Ordinance Number 175891 (Los Angeles Municipal Code, Section 12.20.3) states the following:

Features designated as contributing shall meet one or more of the following criteria:

1. adds to the Historic architectural qualities or Historic associations for which a property is significant because it was present during the period of significance, and possesses Historic integrity reflecting its character at that time; or
2. owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
3. retaining the building, structure, Landscaping, or Natural Feature, would contribute to the preservation and protection of an Historic place or area of Historic interest in the City. (Los Angeles Municipal Code, Section 12.20.3)

Port Master Plan

Development Goals

Goal 5: Protect Historic Resources.

The Port shall identify and pursue the preservation of the historic resources within its jurisdiction. The history of the Port, including significant periods such as the era of shipbuilding, commercial fishing, and the Japanese American Fishing Village, should continue to be memorialized, as appropriate, through monuments and preservation of associated existing buildings and sites. Nothing stated herein shall be interpreted to impede the Port's ability to meet its mandates identified in the Coastal Act to operate as a commercial port and accommodate transportation, commercial, industrial and cargo handling activities. The Built Environment Historic, Architectural, and Cultural Resource Policy, adopted by the Board of Harbor Commissioners (POLA 2013), established the formal procedures to potentially adaptively reuse and preserve built historic, architectural and cultural resources.

The goal to adaptively reuse historic resources shall be included among other goals when considering a proposed use for the site. Further, the Port shall encourage the productive reuse of historic resources in the future by periodically reviewing, as needed, with stakeholder input, whether additional port related land uses in certain areas with identified historic resources would enhance the opportunity to the reuse vacant or underutilized historic resources.

3.2.5 METHODOLOGY

3.2.5.1 Background Research

CHRIS Records Search

On December 6, 2023, an in-person records search of the CHRIS database on file at the South Central Coast Information Center (SCCIC), located on the campus of California State University, Fullerton was conducted. The search included any previously recorded cultural resources and investigations within a 0.25-mile radius of the Proposed Project site. The CHRIS search also included a review of the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, and the California State Historic Resources Inventory list[2].

Previously Conducted Cultural Resource Studies

Results of the CHRIS database records search indicate that nine previous cultural resource studies have been conducted within the 0.25-mile records search area between 1974 and 2014. Of these studies, two reports (LA-02399 and LA-12808) are mapped as overlapping the Proposed Project site and one report (LA-04455) is mapped as adjacent to the north. The entirety (100%) of the Proposed Project site has been previously subjected to multiple cultural resource studies. A bibliography of all previous cultural resource studies within the Proposed Project's records search area is provided in Appendix C of this Draft SEIR. Brief summaries of the overlapping and adjacent reports are provided below.

Report LA-02399

Los Angeles-Long Beach Harbor Areas, Cultural Resources Survey (Weinman and Stickel 1978) presents the results of a cultural resource inventory of the Los Angeles-Long Beach Harbor Areas conducted in 1978, prepared for the United States Army Engineer District for the entirety of the present Proposed Project site and surrounding area. The report provides a regional cultural history, oral interviews, literature search and records search, site visits/survey, and discusses several historical and prehistoric resources. The purpose of the inventory was to locate and identify cultural resources within the Los Angeles-Long Beach Harbor Areas that might be affected by a project and provide a reliable statement on the significance of each site identified and recommendations for inclusion as historical monuments. A total of 18 prehistoric archaeological sites and 21 shipwrecks were identified as a result of the research conducted, and 30 historical resources were identified and addressed as part of the cultural resources survey. None of these resources were identified within the current Proposed Project site.

Report LA-04455

A Cultural Resource Study for the Los Angeles Harbor Deepening Project (Pierson 1980) presents the results of a cultural resource study, conducted in 1980, encompassing the navigable waters of the Los Angeles Harbor and prepared for the United States Army Los Angeles District Corps of Engineers.

[2] The confidential records search results which contains sensitive information related to the location of cultural sites is on file with the LAHD and is available for review by eligible individuals

The study area is adjacent to the north of the present Proposed Project site. The report reviewed existing files addressing the study area, including remote sensing data, historical and archaeological records, and published data for cultural resources identified within the study area. The purpose of the study was to identify and evaluate the significance of identified resources, evaluate the quality of the available data, and report on the findings followed by recommendations. A total of 22 previously recorded cultural resources were identified within the study area consisting of shipwrecks, sunken barges and vessels/structural elements, remnants of the early fishing industry, and piling stumps associated with an old pier; none of these resources were identified within the present Proposed Project site. The report provides two recommended approaches to complete the survey addressed in the report and all involve underwater testing methods and review of the results by a qualified marine archaeologist to inform on the mitigation plan developed for resources identified as significant.

Report LA-12808

Cultural Resources Study of the Wilmington Oil and Gas Field, Los Angeles County, California (Chasteen et al. 2014) presents the results of a cultural resource study/assessment encompassing the navigable waters of the Los Angeles Harbor, prepared in support of an EIR, that was completed in 2014 and includes the entirety of the present Proposed Project site. The cultural resource assessment relied on a CHRIS records search and literature review, a cultural sensitivity study, and project-specific management recommendations. The purpose of the study was to characterize known archaeological and built environment resources and determine the potential to encounter unknown resources during project implementation. It is important to note that a survey was not conducted as part of the assessment. The study determined that there are large areas within the study area that have a moderate to high probability of containing significant cultural resources. The CHRIS records search conducted in support of the 2014 study identified 327 previously recorded cultural resources, of which 270 were identified within the study area. Of the resources listed in the report, none are within the present Proposed Project site; however, three previously recorded resources (P-19-150271, P-19-150280, and P-19-167314) were identified within the present Project's records search area and are addressed in the following section for previously recorded cultural resources. Nevertheless, the area that includes the present Proposed Project site is noted to be an area of moderate sensitivity for archaeological resources. The report notes that while Terminal Island consists primarily of a human-made landmass, there is potential for historic period archaeological resources dating to the development of the Port of Los Angeles to exist, underlying fill soils.

The lengthy and detailed project-specific recommendations provided within the report include: retention of a qualified cultural resource specialist or other staff under the direction of the qualified specialist, to conduct a cultural resources inventory, evaluate resources and produce a Cultural Resources Management and Treatment Plan prior to an issuance of a permit; the cultural resources inventory and evaluation of cultural resources are to be submitted to relevant CEQA agencies for review and approval prior to the issuance of the required permits; development of a historic context; develop a cultural resources sensitivity predictability model for potentially significant archaeological and built environment resources that may be encountered within the study area; conduct a reconnaissance survey for built environment resources and an intensive-level archaeological pedestrian survey; conduct an underwater survey; field documentation of all cultural resources encountered and an evaluation of these resources; Native American coordination consisting of a Sacred Lands File search through the NAHC database and consultation with NAHC-listed individuals/tribal entities; a worker environmental awareness program training for all project personnel; cultural resources monitoring (both archaeological and Native American monitoring) for resources that may be potentially adversely impacted; reporting; curation of archaeological materials retained as a result of the project; and existing regulatory language for the inadvertent discovery of human remains. No cultural resources were identified within the present Proposed Project site as a result of this 2014 study.

Previously Recorded Cultural Resources

The SCCIC records indicate that four cultural resources have been previously recorded within a 0.25-mile radius of the Proposed Project site. The identified cultural resources include, two built environment resources, one structure, and one district. None of these resources were identified within the Proposed Project site. No historic period or prehistoric resources of Native American origin were identified within the Proposed Project or the 0.25-mile records search area. A bibliography of all previously recorded cultural resources within the Project's records search area is provided in Appendix C of this Draft SEIR.

Historical Built Environment Resources

A Department of Parks and Recreation (DPR) 523 form (DPR 523) was prepared for the Project site in 2011, which found the property ineligible for inclusion on the CRHR or the NRHP. However, the Project site was not evaluated at the local level for eligibility as a Los Angeles HCM. A DPR 523 update was completed to evaluate the Project site under LAHCM criteria. This evaluation found the subject property ineligible as a historical resource due to a lack of significant associations and architectural merit. This eligibility finding was based on the previously conducted research from 2011, aerial photographs, and an intensive survey to document any changes to the site since it was previously recorded. Both DPR forms are included in Appendix D.

3.2.5.2 Thresholds of Significance

The criteria for determining the significance for cultural resources impacts during both phases (Phase 1 - Continued Operations and Phase 2 - Nonoperational Restoration Period) under CEQA is discussed below.

CEQA Guidelines Appendix G

The significance criteria used to evaluate the Proposed Project impacts to cultural resources is based on CEQA Guidelines Appendix G. According to CEQA Guidelines Appendix G, a significant impact related to cultural resources would occur if the Proposed Project would:

> CR-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.
>
> CR-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following factors to evaluate cultural resources:

Historic Resources

If the project would result in a substantial adverse change in the significance of a historic resource, including demolition of a significant resource; relocation that does not maintain the integrity and significance of a significant resource, conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; and/or construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Archaeological Resources

If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;

If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;

If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind; and

If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it is at least 100 years old[3] and possesses substantial stratigraphic integrity.

The factors identified above from the L.A. CEQA Thresholds Guide will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

Paleontological Resources

According to CEQA Guidelines Appendix G, a significant impact related to paleontological resources would occur if the Proposed Project would:

> **CR-3:** Directly or indirectly destroy a unique paleontological resource or unique geological features.

The Los Angeles CEQA Thresholds Guide provides that an impact on paleontological resources would be considered significant if it would result in the permanent loss of, or loss of access to, a paleontological resources.

Human Remains

According to CEQA Guidelines Appendix G, a significant impact related to cultural resources would occur if the Proposed Project would:

> **CR-4**: Would the project disturb any human remains, including those interred outside of human cemeteries?

[3] Although the CEQA criteria state that "important archaeological resources" are those which are at least 100 years old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50 years old.

3.2.6 IMPACT DETERMINATION

3.2.6.1 Impact CR-1: Would the Proposed Project cause a substantial change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5?

No historical resources are known to exist in the Proposed Project area. The subject property is a scrap metal recycling facility first developed in 1963 with subsequent upgrades and additions in 1966, 1968, the 1990s, 2004, 2006, and 2009. Appendix D, to this Draft SEIR includes a DPR 523 form prepared in 2011 that finds the subject property ineligible for listing in the NRHP and CRHR and a DPR 523 update form that finds the subject property ineligible as at the local level as an HCM. The DPR 523 form includes building development and archival research; development of an appropriate historic context for the evaluation of the subject property; and the recordation and evaluation of the subject property for historical significance in consideration of the NRHP and CRHR. The DPR 523 update form includes the results of an intensive survey of the Project site by a qualified architectural historian and an evaluation of the subject property's historical significance and integrity in consideration of HCM designation criteria and integrity requirements. These evaluations found the subject property ineligible as a historical resource at the federal, state, and local levels. As such, the subject property is ineligible as a historical resource under CEQA.

Impacts of the Proposed Project

Phase 1 - Continued Operations

No new significant impacts or substantially more severe impacts than previously analyzed would occur to historic resources during the Phase 1 Continued Operations period because no structures would be altered, modified or demolished during this phase. Current operations would continue in an existing industrial facility that is already paved and highly disturbed.

Phase 2 - Nonoperational Restoration

Although the Phase 2 - Nonoperational Restoration Period would involve the demolition/dismantling of all onsite structures and buildings, as stated previously in this discussion, no historic resources are known to exist in the Proposed Project area and the subject property is ineligible as a historic resource under CEQA. Thus, no known historic resources would be disturbed or compromised as a result of the Proposed Project. No new significant impacts or substantially more severe impacts than previously analyzed would occur to historic resources during the Phase 2 – Non-operational Restoration Period.

Mitigation Measures Applicable to the Proposed Project

No mitigation is required.

Significance After Mitigation

No new significant impacts or substantial increase in the severity of impacts previously identified would occur with the implementation of the Proposed Project.

3.2.6.2 Impact CR-2: Would the Proposed Project cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA Guidelines Section 15064.5?

A CHRIS database records search and a review of previously certified environmental documents were conducted for the Proposed Project site. The CHRIS database search identified three built environment resources within the Proposed Project site's records search area. However, no historic period or prehistoric archaeological resources were identified within the Proposed Project site or 0.25-mile records search buffer. Additionally, while the CHRIS records indicate that the entirety of the Proposed Project site was subjected to previous investigations, including pedestrian surveys, these previous studies did not identify archaeological resources within the Proposed Project site. It is important to note that these previous surveys were performed after development and the placement of fills soils and therefore, did not provide for any observation of native/undisturbed ground soils.

A review of previous environmental documents that address the present Proposed Project site (Hugo Neu-Proler Lease Renewal Project Draft EIR, 1995 [SCH No. 93071074]) indicate that the Proposed Project site is underlain with non-native landfill materials that extend from surface to depths between 4 to 10 feet. Current Proposed Project ground disturbing activities during the Phase 2 Nonoperational Restoration period involve the demolition of flat slabs and foundations with an average depth of 16 to 18 inches, and removal of contaminated soils with assumed maximum depths between 2 to 4 feet across the entire Proposed Project site. This suggests that the demolition and soil removal activities would occur within landfill soils (non-native and disturbed soils).

During Phase 1 Continued Operations of the Proposed Project, no subsurface disturbance activity is proposed; therefore, no impact on archaeological resources are anticipated during the continued operations phase.

Impacts of the Proposed Project

Phase 1 - Continued Operations

No new impacts or substantially more severe impacts than previously identified would occur during the Phase 1 - Continued Operations because no subsurface disturbance would occur.

Phase 2 - Nonoperational Restoration

For the reasons discussed above, no new significant impacts or substantially more severe impacts than previously identified would occur during the Phase 2 - Nonoperational Restoration period of the Proposed Project with adherence to applicable regulatory requirements.

Mitigation Measures Applicable to the Proposed Project

No mitigation is required. Adherence to existing regulatory requirements as outlined above and the construction specifications for the inadvertent discovery of archaeological resources would ensure that no new or substantially more severe impacts than previously analyzed would occur to archaeological resources resulting from Phase 2: Nonoperational Restoration of the Proposed Project.

In the absence of new or substantially more severe significant impacts from implementation of the Proposed Project, mitigation is not required. However, the following standard condition of approval has been added to the Proposed Project.

SC CR-1 **Stop Work in the Area if Archaeological Resources Are Encountered.** In the unlikely event that any prehistoric artifact of historic period materials or bone, shell or nonnative stone is encountered during restoration 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.

Significance After Mitigation

No new or significant Impacts or substantial increase in impact previously identified would occur with the implementation of the Proposed Project. No mitigation is required.

3.2.6.3 Impact CR-3: Would the Project directly or indirectly destroy a unique paleontological resource or unique geological features.

No prehistoric sites have been identified in the Proposed Project site or within a 0.25-mile radius of the site. Furthermore, the geologic formation within the Project site is human-made artificial fill created in the twentieth century. The location is on Terminal Island which has been subject to extensive previous construction activity. This activity has likely destroyed any unique paleontological resources and any unique geologic features. The Project excavation would not occur on any geologic layer that could yield unique paleontological resources. Therefore, there would be no impact to unique paleontological resources or unique geologic features.

Phase 1 - Continued Operations

No new significant impacts or substantially more severe impacts than those previously analyzed would occur during the Phase 1 Continued Operations as no subsurface disturbance would occur.

Phase 2 - Nonoperational Restoration

For the reasons discussed above, the Proposed Project's Phase 2 would have no new or more substantially severe impacts than those previously analyzed.

Mitigation Measures Applicable to the Proposed Project

No mitigation is required.

Significance After Mitigation

No new significant impacts or substantially more severe impacts than those previously analyzed would occur during the implementation of the Proposed Project. No new mitigation is required.

3.2.6.4 Impact CR-4: Would the Proposed Project disturb any human remains, including those interred outside of formal cemeteries?

No prehistoric or historic period burials, within or outside of formal cemeteries, were identified within the Proposed Project site as a result of the CHRIS records search. In the event that human remains are inadvertently encountered during ground disturbing activities, they would be treated consistent with state and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the Project site or off-site improvement areas or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC that shall notify those persons believed to be the most likely descendant. The most likely descendant shall determine, in consultation with the property owner, the disposition of the human remains. Compliance with these regulations would ensure that impacts to human remains resulting from the Project would be less than significant.

Impacts of the Proposed Project without Mitigation

Phase 1 - Continued Operations

No new impacts or substantially more severe impacts than those previously identified would occur during Phase 1 - Continued Operations because no subsurface disturbance would occur.

Phase 2 - Nonoperational Restoration

For the reasons discussed above, no new or substantially more severe impacts than those previously identified would occur relating to the inadvertent discovery of human remains during the Proposed Project's Phase 2 - Non-operational Restoration period with adherence to applicable regulatory requirements.

Mitigation Measures Applicable to the Proposed Project

No mitigation is required. Adherence to existing regulatory requirements as outlined above would ensure that no new significant impacts or substantially more severe impacts than previously analyzed would occur to human remains resulting from Phase 2: Nonoperational Restoration of the Proposed Project.

In the absence of new or substantially more severe significant impacts from implementation of the Proposed Project, mitigation is not required. However, the following standard condition of approval has been added to the Proposed Project.

SC CR-2: **Stop Work in the Area if Human Remains are Encountered.** In the unlikely event that any human remains are encountered during restoration activities, excavation shall be immediately stopped, the area shall be secured, and no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted in order to determine proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further excavation activity until consultation with the MLD regarding their recommendations as required by California

Public Resources Code Section 5097.98 has been conducted. In addition, California Public Resources Code Section 5097.98, CEQA Guidelines Section 15064.5 and California Health and Safety Code Section 7050.5 shall be followed in the event that human remains are discovered.

Significance After Mitigation

No new impacts or substantially more severe impacts than those previously identified would occur with the implementation of the Proposed Project. No mitigation is required.

3.2.6.5 Summary of Impact Determinations

Table 3.2-1 provides a summary of the impact determinations of the Proposed Project related to cultural resources. This table is meant to allow easy comparison of the potential impacts of the Proposed Project.

For each type of potential impact, the table describes the impact, notes the impact determinations, describes any applicable mitigation measures, and notes the impact remaining after mitigation. All impacts, whether significant or not, are included in this table.

Table 3.2-1. Summary Matrix of Potential Impacts and Mitigation Measures/Standard Conditions for Cultural Resources Associated with the Proposed Project

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts After Mitigation
Impact CR-1: Would the Proposed Project have a significant impact on built environment historic resources?	No new or substantially more severe significant impacts would occur	No mitigation is required	No new or substantially more severe significant impacts would occur
Impact CR-2: Would the Proposed Project cause a substantial adverse change in the significance of an archeological or ethnographic resources?	No new or substantially more severe significant impacts would occur	No mitigation is required; however SC CR-1: Stop Work in the Area if Archaeological Resources are Encountered would be implemented	No new or substantially more severe significant impacts would occur
Impact CR-3: Would the Project directly or indirectly destroy a unique paleontological resource or unique geological features?	No new or substantially more severe significant impacts would occur	No mitigation is required	No new significant impacts or substantially more severe significant impacts would occur
Impact CR-4: Would the Proposed Project disturb any human remains, including those interred outside of formal cemeteries?	No new or substantially more severe significant impacts would occur	No mitigation is required; however, SC CR-2: Stop Work in the Area if Human Remains are Encountered would be implemented	No new or substantially more severe significant impacts would occur

3.2.6.6 Mitigation and Standard Conditions of Approval Monitoring

In the absence of new or more substantially more severe significant impacts from implementation of the Proposed Project, mitigation measures are not required. However, the following standard

conditions of approval (discussed under Impacts CR-2 and CR-4 in Sections 3.2.6.2 and 3.2.6.4 above) have been added to the Proposed Project.

SC CR-1: **Stop Work in the Area if Archaeological Resources Are Encountered.** In the unlikely event that any prehistoric artifact of historic-period materials or bone, shell or nonnative stone is encountered during decommissioning, 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 the California Office of Historic Preservation guidelines.

SC CR-2: **Stop Work in the Area if Human Remains are Encountered.** In the unlikely event that any human remains are encountered during restoration activities, excavation shall be immediately stopped, the area shall be secured, and no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted in order to determine proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further excavation activity until consultation with the MLD regarding their recommendations as required by California Public Resources Code Section 5097.98 has been conducted. In addition, California Public Resources Code Section 5097.98, CEQA Guidelines Section 15064.5 and California Health and Safety Code Section 7050.5 shall be followed in the event that human remains are discovered.

3.2.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No new significant and unavoidable impacts or a substantial increase in the severity of impacts identified relating to historical, archaeological, or paleontological resources or human remains would occur as a result of the Proposed Project.

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Section 3.3

Greenhouse Gas Emissions

Summary

This section evaluates the Greenhouse Gas (GHG) emissions and climate change impacts associated with Proposed Project activities. This section includes:

- A description of the existing setting as it relates to GHG emissions and climate change;
- A discussion of regulations and policies regarding GHG that are applicable to the Proposed Project;
- A discussion of the analysis methodology;
- A summary of 1996 Certified EIR findings;
- Potential GHG emissions and impacts to climate change associated with Proposed Project activities;
- A description of mitigation measures proposed to reduce significant impacts, as applicable; and
- Residual impacts after mitigation and significance under the California Environmental Quality Act (CEQA).

Key Points

- The Proposed Project would be consistent with plans and policies intended to reduce GHG emissions and climate change impacts.
- Proposed Project GHG emissions would be less than South Coast Air Quality Management District (SCAQMD) CEQA thresholds.
- Proposed Project emissions would be less than the CEQA Baseline.
- Mitigation measures are not required.
- The Proposed Project would not result in significant and unavoidable impacts to GHG and climate change.

3.3.1 INTRODUCTION

Section 2, Project Description, describes in detail activities associated with the Proposed Project. In summary, the Proposed Project seeks to amend Permit No. 750 to allow for an extension of the lease by up to 10 years (to 2024), during which time, Phase 1 - Continued Operation would continue without change to existing activities and throughput would remain at 1.2 million tons. At the end of the 10-year period, the facility would be decommissioned and restored during Phase 2 - Non-operational Restoration Period. Phase 1 and Phase 2 activities are described in detail in Section 2.5.1, and discussed in this section as they relate to GHG.

This section describes the environmental and regulatory setting for GHG. It also describes GHG impacts that may result from implementation of the Proposed Project and provides mitigation measures, where feasible and appropriate.

3.3.2 ENVIRONMENTAL SETTING

The Proposed Project site is located in the Harbor District of the City of Los Angeles, within the South Coast Air Basin (SCAB). The SCAB consists of the non-desert portions of Los Angeles, Riverside, and San Bernadino Counties and all of Orange County, and the adjacent offshore waters, shown in

Figure 3.3.1. The air basin covers an area of approximately 6,000 square miles and is bounded on the west by the Pacific Ocean; on the north and east by the San Gabriel, San Bernardino, and San Jacinto Mountains; and on the south by the San Diego County line.

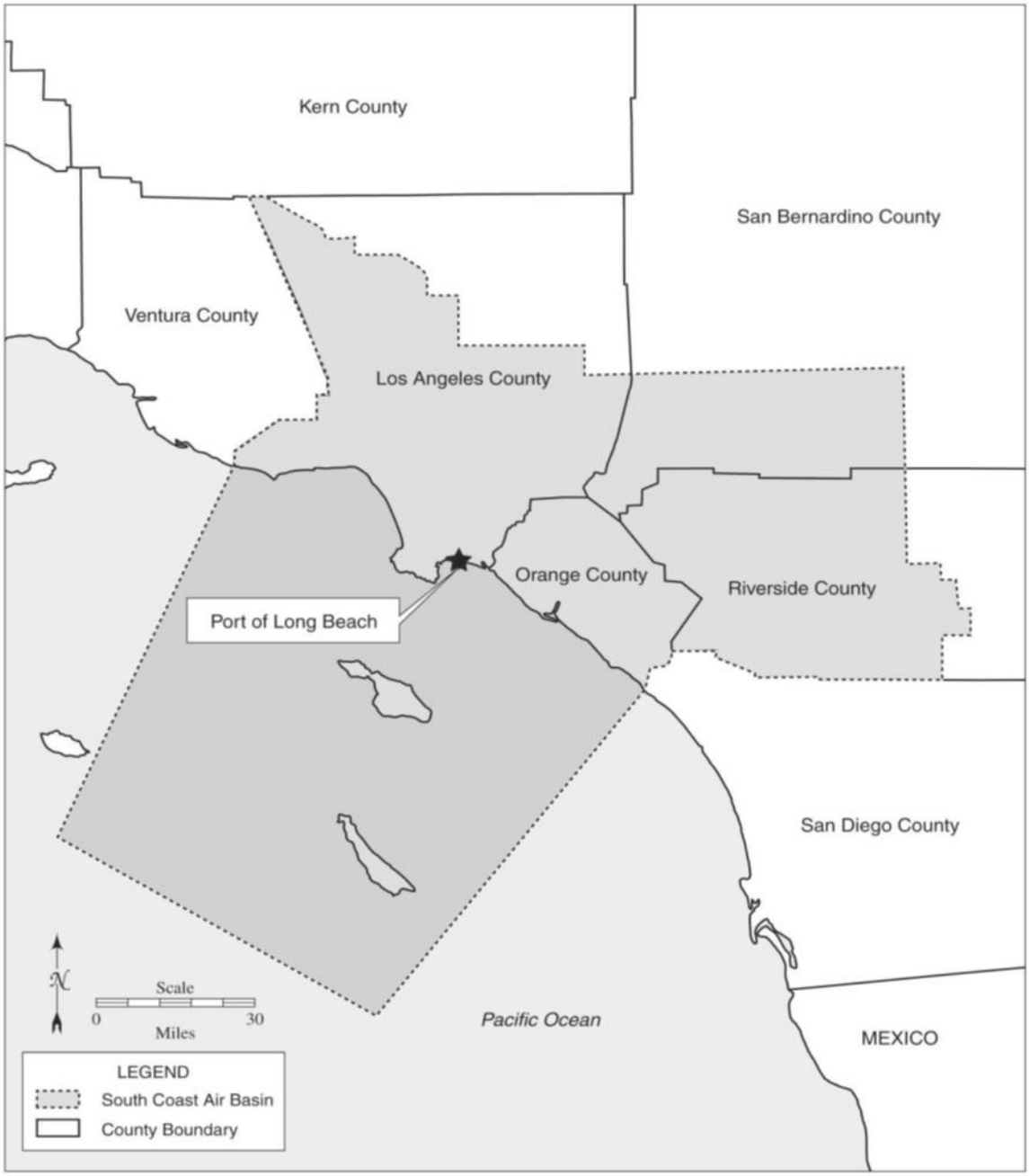

Figure 3.3.1. South Coast Air Basin

3.3.2.1 Greenhouse Gas Pollutants

GHGs are gases that trap heat in the atmosphere. The term GHGs includes gases that contribute to the natural greenhouse effect, such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O),

as well as gases that are only human-made and that are emitted through the use of modern industrial products, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). These last three families of gases, while not naturally present in the atmosphere, have properties that also cause them to trap infrared radiation when they are present in the atmosphere. Together, these six gases comprise the major GHGs that are recognized by the Kyoto Accords (United Nations 1997). There are other GHGs that are not recognized by the Kyoto Accords due either to the smaller role that they play in climate change or the uncertainties surrounding their effects. Atmospheric water vapor, for example, is not recognized by the Kyoto Accords because there is not an obvious correlation between water vapor concentrations and specific human activities. Water vapor appears to act as a positive feedback mechanism; higher temperatures lead to higher water concentrations, which in turn cause more global warming (IPCC 2013).

GHGs have long atmospheric lifetimes (1 year to several thousand years) and therefore remain in the atmosphere for time periods long enough to allow them to be dispersed around the globe. GHGs are therefore considered to be global pollutants and GHG impacts to global climate change are inherently cumulative.

The effect each of these gases has on global warming is a combination of the volume of their emissions and their 100-year global warming potential (GWP). GWP, a unitless quantity, indicates, on a pound-for-pound basis, how much a gas will contribute to global warming relative to how much warming would be caused by the same mass of CO_2. CH_4 and N_2O are substantially more potent than CO_2, with GWPs (100-year horizon) of 28 and 298, respectively (IPCC 2007). In emissions inventories, GHG emissions are typically reported in terms of metric tons (MT or mt); equivalent to 1000 kilograms of carbon dioxide equivalents (CO_2e), which are calculated as the product of the mass emitted of a given GHG and its specific GWP. In this document, the unit “metric tons” is used to report GHG emissions.

The most important GHG in human-induced global warming is CO_2. While many gases have much higher GWPs than CO_2, CO_2 is emitted in vastly higher quantities and accounts for approximately 78 percent of the GWP of all GHGs emitted by the United States (EPA 2021). Fossil fuel combustion, especially for the generation of electricity and powering of motor vehicles, has led to substantial increases in CO_2 emissions and thus substantial increases in global atmospheric CO_2 concentrations over the last century. The International Panel on Climate Change's (IPCC) Sixth Assessment Synthesis Report (IPCC 2023) identified that the global annual average CO_2 concentration reached 410 parts per million (ppm) in 2019. This value represents an increase of about 46 percent since the pre-industrial era. The buildup of CO_2 in the atmosphere is a result of increased emissions and its relatively long lifespan in the atmosphere of 50 to 200 years.

Concentrations of the second most prominent GHG, CH_4, have also increased due to human activities such as agriculture, degradation of waste in landfills, cattle farming, and natural gas mining. In 2019, the atmospheric level of CH_4 was more than double the pre-industrial level, up to 1,886 parts per billion (ppb) as compared to 715 ppb (IPCC 2013, 2023). CH_4 has a relatively short atmospheric lifespan of only 12 years, but it has a higher GWP potential than CO_2.

N_2O concentrations have increased from about 270 ppb in pre-industrial times to about 332 ppb by 2019 (IPCC 2014, 2023). Most of this increase can be attributed to agricultural practices (such as soil and manure management), as well as fossil-fuel combustion and the production of some acids. N_2O has a 120-year atmospheric lifespan, meaning that, in addition to its relatively large GWP, its influence is long lasting, which increases its role in global warming.

3.3.2.2 Climate Change

GHGs differ from criteria pollutants in that GHG emissions do not cause direct adverse human health effects. Rather, the direct environmental effect of GHG emissions is the increase in global temperatures, which in turn has numerous indirect effects on the environment and humans. For example, some observed changes include shrinking glaciers; thawing permafrost; later freezing and earlier break-up of ice on rivers, lakes, and oceans; and shifts in plant and animal ranges (IPCC 2023). Other, longer term environmental impacts of global warming include sea level rise (SLR); changing weather patterns with increases in the severity of storms and droughts; changes to local and regional ecosystems, including the potential loss of species; and a reduction in winter snowpack.

The current understanding of climate change and adaptation options in California is summarized in California's Fourth Climate Change Assessment, a coordinated effort between the Governor's Office of Planning and Research, Energy Commission, and the Natural Resources Agency. California's Fourth Climate Change Assessment is a compilation of scientific research studies projecting climate change impacts and exploring what those impacts mean for various sectors. These forty-four technical reports and seven external contributions are accessible through the California's Fourth Climate Change Assessment website (CCA 2018).

Cal-Adapt is the state's portal for climate projections developed for California's Climate Change Assessments. Cal-Adapt allows visualizations of climate scenarios at the local level and wildfire projections for the state. Current predictions suggest that in the next 25 years California will experience higher temperatures, uncertain precipitation, reduced snowpack, SLR, and increased wildfires. More specifically, California's Fourth Climate Change Assessment predicts the following (CalAdapt 2023):

- Temperature near the Port of Los Angeles (Port or POLA): CalAdapt data shows that temperature may increase by approximately 2.7 degrees Fahrenheit (°F) by 2050 and 3.2 °F by 2070.
- Precipitation near the Port: CalAdapt shows that precipitation projections do not show a consistent trend during the next century. The Mediterranean seasonal precipitation pattern is expected to continue, with most precipitation falling during winter from North Pacific storms. However, even modest changes would have a significant impact because California ecosystems are conditioned to historical precipitation levels and water resources are nearly fully utilized.
- Snowpack in California: CalAdapt indicates that if GHG emissions continue unabated, more precipitation will fall as rain instead of snow, and the snow that does fall will melt earlier, reducing the Sierra Nevada spring snowpack. How much snowpack will be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under wetter climate projections, the loss of snowpack would pose challenges to water managers and hamper hydropower generation.
- SLR near the Port: CalAdapt SLR estimates the fraction of a year during which sea level may exceed the historical maximum of 150 centimeters (cm). The middle emissions estimate of SLR projections shows that by 2070, sea level may exceed the historical maximum 1 percent of the year but may exceed it 27 percent by 2090. The high emissions estimate of SLR projections shows that by 2070, sea level may exceed the historical maximum 17 percent of the year but may it increase 78 percent by 2090.
- Wildfire in California: The frequency, severity, and impacts of wildfire are sensitive to climate change as well as development patterns, temperature increases, wind patterns, precipitation changes, and pest infestations. CalAdapt shows that much of California can expect an increased risk of wildfire, with a wildfire season that starts earlier, runs longer, and features more extreme fire events.

In addition to SLR information in California's Climate Assessment, the state prepared the Sea-Level Rise Guidance (SLR Guidance) in 2018. The guidance was prepared by the Ocean Protection Council, the California Natural Resources Agency, the Office of Planning Research, and the California Energy Commission (OPC 2018). The SLR Guidance presents a synthesis of available science on SLR projections, an approach for state agencies and local governments to evaluate those projections and related hazard information in decision making, and preferred coastal adaptation approaches. Table 30 of the SLR Guidance shows that coastal areas in Los Angeles may experience SLR between 3.8 to 8.4 millimeters (mm) for a high emissions scenario by 2050, 2.3 to 7.3 mm SLR between 2060 and 2080 for a low emissions scenario, and 5.5 to 13 mm SLR between 2060 and 2080 for a high emissions scenario.

Both CalAdapt and the SLR Guidance predict acceleration in SLR, but the rate of acceleration and inundation scenarios vary depending on global CO_2 concentrations and analysis year. In 2018, the POLA conducted the Seal Level Rise Adaptation study to assess the potential impacts of rising sea levels on the Port's infrastructure and operations (POLA 2018). Findings of the study are discussed in Section 3.3.6.3.

As stated above, climate change is predicted to lead to increases in the frequency, intensity, and duration of extreme heat events and heat waves in California. This is likely to increase the risk of mortality and morbidity due to heat-related illness on the elderly; individuals with chronic conditions such as heart and lung disease, diabetes, and mental illnesses; infants; the socially or economically disadvantaged; and those who work outdoors. The expected increase in temperatures and resulting increases in ultraviolet radiation due to climate change are likely to exacerbate existing air quality problems unless measures are taken to reduce GHGs as well as air pollutants and their precursors.

A 2008 study identified direct links between increased levels of CO_2 in the atmosphere and increases in human mortality (Jacobson 2008). The study determined the amounts of ozone and airborne particles that result from temperature increases in CO_2 emissions. The study showed two important effects:

- Higher temperatures due to CO_2 increased the chemical rate of ozone production in urban areas; and
- Increased water vapor due to CO_2-induced higher temperatures boosted chemical ozone production even more in urban areas.

The study further indicated that the effects of CO_2 emissions are most pronounced in areas that already have significant pollution, such as California. Many of the plans, policies, and regulations identified in the Regulatory Setting section of this document are directed at reducing these impacts.

3.3.3 REGULATORY SETTING

Climate change has been recognized as a threat to the global climate, economy, and population. As a result, the climate change regulatory setting – federal, state, and local - is complex and evolving. This section identifies key legislation, executive orders (Eos), and seminal court cases related to climate change germane to the Proposed Project.

Sources of air emissions in California are regulated by the U.S. Environmental Protection Agency (USEPA), the California Air Resources Board (CARB), and SCAQMD. In addition, regional and local jurisdictions play a role in GHG management. This section provides a summary of key EOs, regulations, and policies that potentially apply to the Proposed Project but is not intended to present an all-inclusive listing of applicable requirements.

3.3.3.1 Federal

April 2007 Supreme Court Ruling

In Massachusetts et al. v. Environmental Protection Agency et al. (549 U.S. 497), the U.S. Supreme Court ruled that GHGs were air pollutants within the meaning of the Clean Air Act (CAA) and that the act authorizes the EPA to regulate CO_2 emissions from new motor vehicles, should those emissions endanger the public health or welfare. The Court did not mandate that the EPA enact regulations to reduce GHG emissions but found that the only instances where the EPA could avoid taking action were if it found that GHGs do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHGs contribute to climate change. In 2009, the EPA Administrator signed two distinct findings regarding GHGs under CAA Section 202(a).

- Endangerment Finding: the EPA Administrator found that the current and projected concentrations of the six key GHGs (i.e., CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: the EPA Administrator found that the combined emissions of these GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that threatens public health and welfare.

The findings themselves did not impose requirements on industry or other entities. However, this action was a prerequisite to finalizing the EPA's proposed GHG emissions standards for light-duty vehicles (EPA 2009).

GHG Standards for Medium- and Heavy-Duty Vehicles

In 2011, EPA in coordination with National Highway Traffic Safety Administration (NHTSA) issued Phase 1 GHG emission and fuel economy standards for medium- and heavy-duty trucks manufactured in model years 2014 to 2018. In 2016, EPA and NHTSA jointly issued Phase 2 standards for medium- and heavy-duty vehicles through model year 2027 designed to further improve fuel efficiency and reduce CO_2 emissions.

In April 2023, EPA announced a proposal to revise existing standards to reduce GHG emissions from heavy-duty vehicles in model year 2027 and set new, more stringent standards for model years 2028 through 2032. This proposed program, known as Phase 3, would apply to heavy-duty vocational vehicles (i.e., delivery trucks, refuse haulers, public utility trucks, transit, shuttle, school buses, etc.) and tractors (i.e., day cabs and sleeper cabs on tractor-trailer trucks). These standards apply to vehicle manufacturers and would not require specific action on the part of the Proposed Project.

GHG Standards for Light Duty Vehicles

The EPA has implemented several regulatory frameworks for GHG emissions from vehicles. One key framework is the Corporate Average Fuel Economy (CAFE) standards, administered jointly by the EPA and the NHTSA. Under the CAFE standards, the EPA sets GHG emission standards for passenger cars and light-duty trucks, while the NHTSA sets fuel economy standards. These standards are designed to improve vehicle fuel efficiency and reduce GHG emissions from the transportation sector. The following is a summary of the key phases.

- Phase I (2012–2016): The EPA issued the first set of GHG emission standards for passenger cars and light-duty trucks for model years 2012 to 2016. These standards aimed to reduce GHG emissions and improve fuel efficiency.

- Phase II (2017–2025): The EPA and NHTSA jointly established more stringent GHG emission and fuel economy standards for passenger cars and light-duty trucks for model years 2017 to 2025. These standards require automakers to achieve increasingly lower emission levels and higher fuel economy over time.

These standards apply to vehicle manufacturers and would not require specific action on the part of the Proposed Project.

3.3.3.2 State

California has enacted a variety of laws that relate to climate change, many of which set aggressive goals for GHG reductions within the state and are based on executive orders issued by state governors. The discussion below provides an overview of the CARB and Office of Planning and Research documents and of the primary executive orders and legislation that relates to climate change and may affect the GHG emissions associated with the Proposed Project. Many of the plans, policies, and regulations in this section apply to state agencies and local governments and would not require specific action on the part of the Proposed Project; they are included here to highlight the GHG framework in California.

Executive Order S-3-05, Assembly Bill 32, 2008 Scoping Plan, and 2014 Scoping Plan Update

In 2005, Executive Order (EO) S-03-05 established the following state targets: (1) year 2000 levels by 2010; (2) year 1990 levels by 2020; and (3) 80 percent below 1990 levels by 2050. EO S-3-05 established state targets and directed the state legislature to develop legislation to address those targets.

In 2006, Assembly Bill (AB) 32 codified the first two targets of EO S-3-05 into state law. AB 32 directed state regulatory agencies to develop rules and regulations to meet the 2020 state targets, required CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions, and required CARB to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG reductions.

In 2008, CARB adopted the AB 32 Scoping Plan, which set forth the framework for facilitating the state's AB 32 GHG goals. The Scoping Plan's GHG reduction actions included direct regulations, compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. In 2014, CARB adopted an update to the 2008 Scoping Plan that built upon the initial Scoping Plan with new strategies to achieve the third AB 32 state target, 1990 emission levels by 2020.

The 2008 Scoping Plan and 2014 Scoping Plan Update envisioned that reductions in GHG emissions would come from virtually all sectors of the economy and be accomplished from a combination of policies, planning, direct regulations, market approaches, incentives, and voluntary efforts. These efforts target GHG emission reductions from cars and trucks, electricity production, fuels, and other sources.

EO B-30-15, Senate Bill 32, and 2017 Scoping Plan Update

In April 2015, EO B-30-15 established an interim, Statewide GHG emissions-reduction target of 40 percent below 1990 levels by 2030 and directed state legislature to develop legislation to address this state target. This interim target was established in order to ensure the state meets the EO S-3-05 target of reducing GHG emissions to 80 percent below 1990 levels by 2050.

In 2016, Senate Bill (SB) 32 codified the EO B-30-15 target and directed state regulatory agencies to develop rules and regulations to meet the target. CARB adopted the 2017 Scoping Plan Update to

align with the EO B-30-15 target. The 2017 Scoping Plan Update focused on the transportation sector, aiming to reduce its significant contribution to GHG emissions; measures included expanding zero-emission vehicle adoption, improving public transit, promoting sustainable land use planning, and encouraging alternative fuels and vehicle technologies. The Scoping Plan also highlighted the importance of expanding renewable energy generation and improving energy efficiency across sectors and developed strategies to promote energy efficiency and low-carbon technologies. The Scoping Plan also introduced strategies to reduce Short-Lived Climate Pollutants (SLCP), such as methane and black carbon, which have significant near-term warming effects.

EO B-55-18, AB 1279, and 2022 Scoping Plan Update

In 2018, EO B-55-18 established the following GHG emission reduction targets for California state agencies: 1) Carbon neutrality by 2045; and 2) 85 percent reduction below 1990 levels by 2045. AB 1279 codified these targets.

In 2022, CARB released the 2022 Scoping Plan Update to assess progress towards achieving the SB 32 2030 target of 40 percent below 1990 emission levels and lay out a path to achieve carbon neutrality in 2045 to align with EO B-55-18 and AB 1279. The Scoping Plan expands upon earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The Scoping Plan also incorporated an approach to decarbonize every sector of the economy and reduce petroleum demand by 94 percent.

Idling Restrictions

CARB set regulations to restrict idling from commercial vehicles (Title 13 California Code of Regulations [CCR], Section 2485) and off-road equipment such as construction equipment (Title 13, CCR, Section 2449) to 5 minutes primarily to control airborne toxic emissions from diesel fuel combustion. However, idling restrictions have the co-benefit of also reducing GHG emissions.

Low Carbon Fuel Standard

CARB identified the Low Carbon Fuel Standard (LCFS) as a Discrete Early Action item under AB 32 and adopted the standard in 2009 (17 California Code of Regulations [CCR] 95480–95490). The LCFS intended to reduce GHG emissions by reducing the carbon intensity of transportation fuels used in California by 10 percent by 2020. CARB extended the LCFS program to 2030, making changes to the design and implementation of the program including doubling the statewide carbon intensity reduction to 20 percent by 2030. The extension also added new crediting opportunities to promote zero-emission vehicle adoption and advanced technologies to achieve decarbonization in the transportation sector. Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the “lifecycle” of a transportation fuel. This program applies to fuel providers and would not require specific action on the part of the Proposed Project.

Advanced Clean Truck Program

CARB developed and the Office of Administrative Law (OAL) approved the Advanced Clean Truck (ACT) Program in 2021. ACT is intended to increase the penetration of zero-emission heavy-duty trucks into the market. A key feature is a zero-emission vehicle (ZEV) truck sales mandate that would begin in 2024 and increase to up to 75 percent ZEV by 2035 depending on truck gross vehicle weight rating. This program applies to vehicle sales and would not require specific action on the part of the Proposed Project.

Advanced Clean Cars Program

CARB adopted and OAL approved the Advanced Clean Cars II regulations in 2022, imposing the next level of low-emission and zero-emission vehicle standards for vehicle model years 2026–2035. The program aims to help meet federal ambient air quality ozone standards and California's carbon neutrality targets. A key feature is ZEV passenger cars, trucks, and SUVs sales mandate that would ramp up to 100-percent ZEV sales by 2035. This program applies to vehicle sales and would not require specific action on the part of the Proposed Project.

Ocean-Going Vessels At-Berth Regulation

CARB approved the original Ocean-Going Vessels At-Berth Regulation in 2007, setting control requirements for emissions from container, refrigerated cargo (reefer), and cruise vessels while hoteling at berth. The At-Berth Regulation was amended on December 30, 2020, increasing its requirements for already-covered vessel types, and expanding its requirements to include auto carriers (roll-on/roll-off vessels) and tanker ships to control hoteling emissions at-berth starting in 2025 for POLA and the Port of Long Beach. Even though this regulation is meant to curtail local criteria pollutant emissions, it may have some co-benefits for reducing GHGs if controlled in conjunction with renewable-based electricity. It must be noted that the bulk vessel category, the type of vessels that would be part of the Proposed Project and its alternatives, do not have requirements under the current ruling.

Renewable Portfolio Standard, SB 100 & EO B-55-18

California's Renewable Portfolio Standard (RPS) established California's renewable electricity procurement target of 33 percent by 2020. The RPS was revised, and its goals accelerated in 2015, increasing California's renewable electricity procurement target to 50 percent by 2030. The latest revisions were promulgated via SB 100 and EO B-55-18 in 2018. EO B-55-18 and SB 100 were signed on the same day. EO B-55-18 setting the new state-wide goal to achieve carbon neutrality (zero-net GHG emissions) by 2045. Specifically, it set a 2045 goal of powering all retail electricity sold in California and state agency electricity needs with renewable and zero-carbon resources, including those such as solar and wind energy that do not emit climate-altering GHGs. SB 100 increased the RPS target to 60 percent by 2030 and required that 100 percent of the state's electricity come from carbon-free resources by 2045. The RPS applies to power providers and would not require specific action on the part of the Proposed Project.

3.3.3.3 Local

The Sustainable City pLAn / LA Green New Deal pLAn

The 2015 City of Los Angeles Sustainable City pLAn (pLAn) outlined the City's long-term sustainability goals and targets across various sectors, including energy, transportation, water, waste, and environmental justice through 2035. The pLAn was revised in 2019 as LA's Green New Deal pLAn, which extended the roadmap through 2050. Some key features include 100 percent renewable energy by 2045, 100 percent net-zero carbon new buildings by 2050, and 100 percent ZEVs by 2050. In addition, the Green New Deal pLAn set a target aimed to reduce Port-related GHG emissions by 80% by 2050 via the following:

- Incorporating sustainable practices in tenant lease agreements at cargo terminals by 2030;
- Developing technology and pilot at-berth controls for liquid bulk vessels by 2028;
- Deploying 50-100 zero emission trucks in a clean truck pilot by 2035; and,
- Implementing an updated Clean Truck Program with prioritization on zero emission trucks.

City policies and plans typically apply to City agencies, local governments, or are Port-wide actions and would not require specific action on the part of the Proposed Project; they are included here to highlight the GHG framework in California.

Port of Los Angeles Policies

Port Climate Action Plan (CAP)

The 2007 Green LA Plan led the Los Angeles Harbor District (LAHD) to develop an individual CAP to explore opportunities to reduce GHG emissions from municipal operations (such as Port buildings and Port workforce operations). The CAP outlines specific steps that the LAHD has taken and will take on global climate change. These steps include specific actions for energy audits, green building policies, onsite photovoltaic solar energy, green energy procurement, tree planting, water conservation, alternative fuel vehicles, increased recycling, and green procurement.

The CAP also identifies San Pedro Bay Ports Clean Air Action Plan (CAAP) measures that have significant GHG reduction co-benefits, such as the Vessel Speed Reduction Program (VSRP) and Alternative Marine Power (AMP). GHG reduction needs from Port's tenant activities are recognized in the CAP, but are deferred to the CAAP, which addresses tenant operations.

In addition, the June 2008 Port of Los Angeles Sustainability Assessment contains an assessment of existing programs and policies against the eight goals that were identified in Executive Directive No. 10 on Sustainability Practices in the City of Los Angeles. LAHD has also completed annual GHG inventories of the Port's municipal activities and reported these to third-party registries since 2006. LAHD's Annual Inventory of Air Emissions has also included GHG estimates for transportation activities associated with goods movement for ocean-going vessels (OGVs), harbor craft, trucks, locomotives, and cargo handling equipment since 2006. LAHD expanded the GHG inventories to include an expanded geographical delineation for OGVs, trucks, and locomotives. These annual inventories and their methodology reports can be found on the Port's website (POLA 2022, POLA 2023). The CAP applies to Port-wide sources and would not require specific action on the part of the Proposed Project.

San Pedro Bay Ports Clean Air Action Plan

The Port, in conjunction with the Port of Long Beach and with the cooperation of SCAQMD, CARB, and EPA, adopted the CAAP in 2006, adopted an updated CAAP in 2010, and in 2017 (LAHD 2006-2017). The CAAP is a sweeping plan designed to reduce the health risks posed by air pollution from all port-related emissions sources, including ships, trains, trucks, terminal equipment, and harbor craft. In addition, the 2017 CAAP Update aligns with the California Sustainable Freight Action Plan, supports the zero-emissions and freight efficiency targets set by the state and other agencies, and contains the following GHG reduction goals:

- Reduce GHGs from Port related sources to 40 percent below 1990 levels by 2030; and
- Reduce GHGs from Port related sources to 80 percent below 1990 levels by 2050.

In addition, other CAAP Update strategies not directly related to GHG reduction (i.e., criteria pollutant and cancer risk reduction strategies) may result in GHG reductions as older technologies are replaced with newer, more fuel-efficient ones.

Port of Los Angeles Actions to Reduce GHG Emissions by 2050

In September 2014, LAHD prepared Actions to Reduce GHG Emissions by 2050 and submitted the document to the City of Los Angeles (POLA 2014). The document presents a summary of the actions

being undertaken by LAHD to reduce GHG emissions associated with LAHD operations, as well as its leadership role to help the maritime industry reduce its emissions occurring in the Port area. The document shows that quantifiable progress has been made in reducing GHG emissions reductions from 1990 to 2013 and outlines actions/strategies that are either being implemented or evaluated for possible implementation, in an effort to continue to reduce GHG emissions. While not a legal mandate, the plan establishes a Port-wide goal of 35 percent reduction by 2035 and 80 percent reduction by 2050.

LAHD Sustainable Construction Guidelines

The LAHD adopted the Sustainable Construction Guidelines (SCG) in 2009. As part of LAHD's overall environmental goals and CAAP strategies, any construction at the Port must follow the SCG. The guidelines reinforce and require sustainability measures under construction contracts, addressing a variety of emission sources that operate at the Port. In addition, the LAHD Construction Guidelines include Best Management Practices based on CARB-verified best available control technology (BACT), designed to reduce air emissions from construction sources. The SCG would apply to all sources, such as construction equipment and construction trucks, associated with the Proposed Project.

Additional Rules, Regulations and Policies

In addition to the above, rules, regulations, and policies, discussed in Chapter 3.1, Air Quality that reduce fuel consumption and increase energy efficiency, would have the co-benefit of also reducing GHG emissions.

3.3.4 METHODOLOGY

This section summarizes the methodology used to quantify GHG emissions from continued operation (Phase 1) and non-operational restoration (Phase 2) activities. Phase 1 and Phase 2 activities are described in detail in Section 2.5.1 of this SEIR. The analysis assumptions, source characteristics, activity, emission factors, and other supporting information are presented in a tabular format Appendix B, Air Quality and GHG Calculation Tables.

Annual GHG emissions were calculated for CO_2, CH_4, and N_2O associated with Phase 1 and Phase 2 activities. Emissions were converted to CO_2e using the 100-year horizon GWPs of 28 for CH_4 and 298 for N_2O from the 4th IPCC Assessment Report (IPCC 2007). The 4th IPCC Assessment Report was chosen for this analysis because it is consistent with the Port's 2023 Emissions Inventory Methodology Document and the EPA's 2021 Inventory of U.S. Greenhouse Gas Emissions and Sinks (POLA 2023, EPA 2021).

Impacts were determined by subtracting the CEQA Baseline, which is discussed at the end of this section, from the maximum of Phase 1 and Phase 2 emissions, and comparing the resulting increment to SCAQMD significance thresholds, discussed in Section 3.3.5 Thresholds of Significance.

The emissions quantified in this analysis were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. The numerical results presented in the tables of the report were rounded, often to the nearest whole number, for presentation purposes. As a result, totals presented in the tables may not add exactly.

The activity descriptions and activity data used in the GHG emission calculations for baseline and the Proposed Project are the same as described in Section 3.1, Air Quality and Meteorology, are not repeated here. The methodologies used to quantify GHG emissions are also very similar to those discussed in Section 3.1 and are not repeated here. However, in cases where the GHG methodologies

differ slightly from those discussed in Section 3.1, they are discussed here. The following summarizes the methodology for quantifying GHG emissions by source type.

Summary of Phase 1 Activities and Analysis Methodology

- Phase 1 Material Transport Sources.
  - Dry-bulk vessels (engine exhaust) - Activity and methodology are essentially the same as those discussed in detail in Section 3.1.4, Air Quality, Methodology, Summary of Phase 1 Activities and Methodology. Annual activity reflects 28 vessels. The only key difference from the methodology discussed in Section 3.1.4 is that GHG emissions were calculated for vessels transiting beyond the SCAB over-water boundary of approximately 50 nautical miles, to the California border of approximately 170 nautical miles.
  - Tugboats (engine exhaust) - Annual activity reflects 2 tugboats per vessel, necessary to assist 28 annual vessels, and is the same as that discussed in Section 3.1.4, Air Quality, Methodology, Summary of Phase 1 Activities and Methodology. Emission factors are different from those discussed in Section 3.1.4 and reflect zero-hour emission factors reported in the Port's 2023 Emissions Inventory Methodology Document (POLA 2023). Zero-hour emission factors are appropriate because engine deterioration does not significantly affect GHG emission factors (per POLA 2023 Emissions Inventory Methodology Report Table 3.2). Tugboat emission factors are presented in Appendix B, Table A-23.
  - Trucks (exhaust) - Annual activity reflects 93,566 truckloads and transit distances provided by the SA Recycling (Applicant) based on 2021/2022 activity and is not expected to change in the future. Truck activity and transit distance are presented and referenced in Appendix A, Table A-2. Emission factors were obtained from CARB's Emission Factors Model (EMFAC) model discussed in Section 3.1.4 and the emission methodology is the same as that discussed in detail in Section 3.1.4 (CARB 2021).
  - Worker vehicles (engine exhaust) - Annual activity was calculated by multiplying the 140 average number of daily workers, provided by the Applicant, by 365 annual operating days. This is a conservative assumption because the facility typically operates Monday through Saturday; activities on Sunday occur on days a ship is at berth. The transit distance is the same as that discussed in Section 3.1.4. Activity and transit distance are presented and referenced in Appendix B, Table A-2. Emission factors were obtained from CARB's EMFAC model, also discussed in Section 3.1.4. The emission methodology is the same as that discussed in detail in Section 3.1.4.
  - Locomotives (engine exhaust) – The Applicant reported 599 annual rail cars were delivered to the facility in 2021/2022 and that 3 rail cars were brought to the facility at any one time. It was assumed that one locomotive was required per visit. Therefore, a total of 200 annual locomotive visits were calculated to have occurred and would continue to occur in the future. Based on the distance from nearby rail yards, it was estimated that 3 hours would be needed per each locomotive visit and therefore, 600 hours of annual locomotive use. The emission methodology is the same as that discussed in detail in Section 3.1.4.
  - Phase 1 On-Site Sources Subject to Annual Emissions Reporting (AER) (engine exhaust). As discussed in Section 3.1.4, annual emissions of criteria pollutants from stationary material handling and material processing sources were quantified by the Applicant and reported to the SCAQMD as part of the SCAQMD's AER program. Although GHG emissions are not subject to the AER program, annual fuel use was reported by equipment and fuel type. GHG emissions were calculated as the product of annual fuel use and emissions factors reported in The Climate Registry (TCR). GHG emissions associated external combustion sources were calculated as the product of fuel use and emission factors

specific to each fuel type. Emission factors were obtained from TCR Tables 1.1 and 1.7. GHG emissions associated with internal combustion sources were calculated using emission factors from the TCR Tables 1.1 and 2.7.

- Phase 1 On-Site Sources not Subject to AER Reporting (engine exhaust). Emissions from mobile equipment and loading/unloading activities, not subject to AER reporting, were calculated based on the Applicant's 2021/2022 inventory of equipment and fuel use. GHG emissions associated external combustion sources, all the sources in this category, were calculated as the product of fuel use and emission factors specific to each fuel type. Emission factors were obtained from TCR Tables 1.1 and 1.7.
- Phase 1 Indirect GHG Emissions (electricity use). Indirect GHG emissions were calculated based on Phase 1 electricity use. Electricity use is directly linked to material throughput and was provided by the Applicant for 2021/2022 activities. 2021/2022 activity and associated electricity use would not change for Phase 1 activities. Emissions were calculated as the product of electricity use and emission factors where emission factors were obtained from TCR, Table 3.1. Emission factors are presented and referenced in Appendix B, Table A-53.

Summary of Phase 2 Activities and Analysis Methodology

- Phase 2 One Dry-Bulk Vessel (engine exhaust). One vessel would be needed for one day to load and transport approximately 5,500 tons of processed metal from dismantled on-site structures. Vessel emissions were calculated using the same methodology discussed in Phase 1 for dry-bulk vessels.
- Phase 2 Tugboats (engine exhaust). Two tugboats would be used to assist the vessel. The same methodology described in Phase 1 was used in the analysis of Phase 2 tugboats.
- Phase 2 Equipment Exhaust, Vehicle Exhaust, and Indirect Emissions from Electricity Use. The same methodology as discussed in Section 3.1.4 was used to calculate GHG emissions associated with Phase 2 non-shipping emissions. In summary, California Emissions Estimator Model (CalEEMod) version 2022.1.1.13 model was used to quantify emissions from Phase 2 non-vessel activities (CAPCOA 2022). The CalEEMod model is approved by the SCAQMD and is well suited to many land development projects. The model uses emission factors for off-road equipment and on-road vehicles from the CARB emissions inventory. The activity schedule and equipment utilization, developed and provided by the Applicant, were used as CalEEMod input, and are included in Appendix B, Table A-55, CalEEMod Output. CalEEMod default values were used in instances where equipment utilization was unavailable from the project proponent or LAHD.

CEQA Baseline

The CEQA Baseline is discussed in detail in Section 2.4.7 of Chapter 2, Project Description. In summary, the CEQA Baseline for the Proposed Project is existing operation in Fiscal Year 2021/2022. CEQA Baseline emissions were calculated using the methodology discussed above and are presented in Table 3.3-1 below.

Table 3.3-1. CEQA Baseline, GHG Emissions (metric tons per year)

Source Category	CO_2	CH_4	N_2O	CO_2e
Vessels - at Berth	1,190	0	0	1,209
Vessels – Transit	2,174	0	0	2,208
Vessels – Anchorage	358	0	0	364
Tugboats	94	0	0	95

Table 3.3-1. CEQA Baseline, GHG Emissions (metric tons per year)

Source Category	CO_2	CH_4	N_2O	CO_2e
Trucks	9,308	0	1	9,751
Rail	82	0	0	83
Onsite Equipment	4,268	0	0	4,374
Worker Vehicles	608	0	0	615
Indirect GHG Emissions from Electricity Use	3,999	0	0	4,015
2021/2022 CEQA Baseline	**22,082**	**1**	**2**	**22,714**

Notes:
Emissions may not add exactly due to rounding.
CO_2 equivalent (CO_2e) is the product of the emissions of a given GHG and its specific GWP. See Section 3.3.4, Methodology.

3.3.5 THRESHOLDS OF SIGNIFICANCE

CEQA Guidelines Appendix G (California Code of Regulations [CCR] Title 14, Division 6, Chapter 3, Section 15000–15387) recommends that significance criteria established by the applicable air quality management district or air pollution control district be relied upon to make determinations of significance and recommends consideration of the following in assessing impacts. In addition, CEQA also affords the lead agency discretion to evaluate the significance of GHG emissions quantitatively or qualitatively, to select the model or methodology it considers appropriate for doing so, provided it supports its decision with substantial evidence, and recommends consideration of the following in assessing GHG impacts:

Would the project:

a. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions?

The Initial Study/Notice of Preparation (IS/NOP) addressed both questions and determined that the first question would be evaluated further in the SEIR and that the second question would be discussed further in the SEIR as an informational item. Therefore, in accordance with the determination made in the IS/NOP, this assessment provides additional review in Section 3.3.6.1 on whether the Proposed Project would generate GHG emissions, either directly or indirectly, and on Section 3.3.6.2 on whether implementation of the Proposed Project would produce any new impacts regarding consistency with relevant plans, policies and regulations.

The CEQA guidelines do not specify significance thresholds and allow lead agencies discretion in how to address and evaluate significance based on these criteria. To provide guidance to local lead agencies regarding determining significance for GHG emissions in CEQA documents, SCAQMD in 2008 adopted a threshold of 10,000 metric tons per year (mty) of CO_2e for industrial projects. This threshold has been included as part of the SCAQMD Air Quality Thresholds since 2008 (SCAQMD 2008, SCAQMD 2023).

Finally, CEQA Guidelines Section 15126.2(a) identifies the need to evaluate potential impacts of locating development in areas that are vulnerable to climate change effects. The EIR "should evaluate any potentially significant impacts of locating development in other areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas)." Although no quantitative significance thresholds are defined for evaluating the potential impacts of locating development in areas that are

vulnerable to climate change effects, the analysis addresses this evaluation qualitatively under the subsections on sea level rise in Section 3.3.6.3.

3.3.6 IMPACT DETERMINATION

3.3.6.1 Impact GHG-1: Would the Proposed Project generate GHG emissions, either directly or indirectly, that would exceed the SCAQMD 10,000 mty CO_2e threshold?

Discussion of 1996 Certified EIR Findings

The 1996 Certified EIR did not evaluate GHG impacts because the document predates CEQA Guidelines recommending consideration of GHG impacts.

Impacts of the Proposed Project without Mitigation

Phase 1 and Phase 2 activities would result in direct GHG emissions from engine exhaust and indirect GHG emissions from electricity use. Table 3.3-2 summarizes GHG emissions by source category. The CEQA increment was determined by subtracting the CEQA Baseline from the maximum of Phase 1 and Phase 2 annual emissions. Table 3.3-2 shows that the CEQA increment would be below the SCAQMD significance threshold and that emissions would be less than the CEQA Baseline.

The table shows that Phase 1 truck and worker vehicle emissions would be reduced, in comparison to the CEQA Baseline, as older vehicles are replaced with more fuel efficient and electric vehicles, per existing regulatory requirements. This reduction is incorporated into CARB's EMFAC model and is reflected in the analysis. Conversely, although it is anticipated that future indirect GHG emissions associated with electricity use would be reduced in accordance with California's RPS, which set a 60 percent renewable electricity procurement target by 2030, as discussed in Section 3.3.3.2, the anticipated reduction was conservatively not accounted for in the analysis. It should also be noted that the analysis calculated emissions for the first year of activity under the proposed 10-year lease and did not take credit for anticipated emission reductions, due to existing regulatory requirements beyond the first year; future emissions were assumed to remain unchanged after the first year of the proposed 10-year lease. This is a conservative approach, as emissions would reasonably be expected to decrease in future years due to more stringent regulatory requirements.

As discussed in Section 3.1.4, Methodology, Phase 2 non-vessel emissions were calculated, using CalEEMod, for each year of activity. Vessel emissions were calculated using the same methodology used to calculate emissions during Phase 1 activities.

As discussed in Section 3.3.4, Methodology, the CEQA increment was determined by subtracting the CEQA Baseline from the maximum of Phase 1 and Phase 2 emissions, and comparing the resulting increment to SCAQMD significance thresholds, discussed in Section 3.3.5 Thresholds of Significance. Since Phase 1 has the higher emissions, it was used for determining potential impacts.

Table 3.3-2. Proposed Project Annual GHG Emissions (metric tons/year)

Source Category	CO_2	CH_4	N_2O	CO_2e
2021/2022 Baseline				
Vessels - at Berth	1,190	0	0	1,209
Vessels – Transit	2,174	0	0	2,208

Table 3.3-2. Proposed Project Annual GHG Emissions (metric tons/year)

Source Category	CO_2	CH_4	N_2O	CO_2e
Vessels – Anchorage	358	0	0	364
Tugboats	94	0	0	95
Trucks	9,308	0	1	9,751
Rail	82	0	0	83
Onsite Equipment	4,268	0	0	4,374
Worker Vehicles	608	0	0	615
Indirect GHG Emissions from Electricity Use	3,999	0	0	4,015
2021/2022 Baseline	**22,082**	**1**	**2**	**22,714**
Proposed Project - Phase 1				
Vessels - at Berth	1,190	0	0	1,209
Vessels – Transit	2,174	0	0	2,208
Vessels – Anchorage	358	0	0	364
Tugboats	94	0	0	95
Trucks	9,299	0	1	9,734
Rail	82	0	0	83
Onsite Equipment	4,268	0	0	4,374
Worker Vehicles	585	0	0	591
Indirect GHG Emissions from Electricity Use	3,999	0	0	4,015
Proposed Project - Phase 1	**22,050**	**1**	**2**	**22,673**
Proposed Project - Phase 2				
2034 Equipment Exhaust, Vehicle Exhaust, Electricity Use	199	0	0	200
2035 Equipment Exhaust, Vehicle Exhaust, Electricity Use	780	0	0	791
2035 Shipping Emissions				
Vessels - at Berth	10	0	0	10
Vessels – Transit	106	0	0	107
Vessels – Anchorage	0	0	0	0
Tugboats	3	0	0	3
2036 Equipment Exhaust, Vehicle Exhaust, Electricity Use	1,183	0	0	1,233
2037 Equipment Exhaust, Vehicle Exhaust, Electricity Use	863	0	0	897
Proposed Project - Phase 2 (max annual)	**1,183**	**0**	**0**	**1,233**
CEQA Impacts				
CEQA Threshold				*10,000*
CEQA Increment	*-32*	*0*	*0*	*-41*
CEQA Significant Impact?				*No*

Notes:
Emissions may not add exactly due to rounding.
CO_2 equivalent (CO_2e) is the product of the emissions of a given GHG and its specific GWP. See Section 3.3.4, Methodology.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project would not result in any new significant impacts under Impact GHG-1.

3.3.6.2 Impact GHG-2: Would the Proposed Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Discussion of 1996 Certified EIR Findings

The 1996 Certified EIR did not evaluate GHG impacts because the document predates CEQA Guidelines recommending consideration of GHG impacts.

Impacts of the Proposed Project without Mitigation

Table 3.3-3 summarizes the consistency of the Proposed Project with key relevant GHG reduction plans, policies or regulations.

Table 3.3.-3. Consideration of State and Local GHG-Reducing Plans and Policies

Plan or Policy	Plan/Policy Measure	Discussion
Standards for Medium- and Heavy-Duty Vehicles	Phases 1, 2, and 3 set GHG emission and fuel economy standards for medium- and heavy-duty vehicles.	*No Conflict.* The standards require vehicle manufacturers to achieve increasingly lower emission levels and higher fuel economy over time. Medium- and heavy-duty vehicles would be subject to these standards. No element of the Proposed Project would conflict with the standards.
California GHG Reduction Targets	AB32 Targets: Year 2000 levels by 2010 Year 1990 levels by 2020 80% below 1990 levels by 2050 SB32 Target: 40 percent below 1990 levels by 2030 AB1279 Targets: Carbon neutrality by 2045 85% reduction below 1990 levels by 2045 CARB Scoping Plans 2008, 2014, 2017, 2022 developed strategies to achieve California's GHG reduction targets.	*No Conflict.* California established statewide goals but did not identify measures directly applicable at a project-level. The Proposed Project's vehicle, ship, tugboat, and off-road equipment use and associated fuels would be subject to State's regulations and requirements that are designed to accelerate the transition to zero-emission technologies. No element of the Proposed Project would impede California's progress toward transition to low- or zero-emission vehicles and low-carbon and alternative fuels. Electricity would be sourced from the Los Angeles Department of Water and Power (LADWP), which is subject to the RPS requirements. Therefore, electricity used at the site would comply with state electricity sector GHG reduction strategies. No element of the Proposed Project would impede California's progress toward renewable energy goals.
Low Carbon Fuel Standard	Set latest statewide carbon intensity reduction to 20 percent by 2030.	*No Conflict.* This regulation applies primarily to California's fuel providers. No element of the Proposed Project would conflict with this regulation.
RPS	RPS established California's renewable electricity procurement targets:	*No Conflict*: Electricity would be sourced from LADWP, which is subject to the RPS requirements. Therefore, electricity used at the site would comply with state electricity sector GHG

Table 3.3.-3. Consideration of State and Local GHG-Reducing Plans and Policies

Plan or Policy	Plan/Policy Measure	Discussion
	33% by 2020 50% by 2030 Carbon neutrality (zero-net GHG emissions) by 2045	reduction strategies. No element of the Proposed Project would impede California's progress toward renewable energy goals.
Advanced Clean Truck/Advanced Clean Car Regulations	CARB established ZEV sales mandates to increase the penetration of ZEV trucks and automobiles into the market.	*No Conflict.* These regulations set sales mandates. Proposed Project vehicles would be subject to California's sales mandates and as such would not conflict with these regulations. No element of the Proposed Project would conflict with the standards.
Limited Idling Time for Commercial Vehicles and Off-Road Equipment	Both regulations restrict idling to 5 minutes.	*No Conflict.* Commercial vehicles (e.g., equipment and delivery trucks) would be subject to lease measures during Phase 1. Equipment idling would comply with the idling restriction via the LAHD Sustainable Construction Guidelines imposed on the contractor during Phase 2.
City of Los Angeles Green New Deal Sustainability pLAn (2019)	The pLAn set the following goals for 2050: zero carbon grid, zero carbon transportation, zero carbon buildings, zero waste, and zero wasted water. Goals and measures identified below, although not directly applicable at a project-level, are most relevant to the Proposed Project and Action Alternative.	*No Conflict.* The Proposed Project would not impede the City's achievement of pLAn goals as discussed below.
	pLAn-1. Renewable Energy:	Electricity would be sourced from LADWP, which is subject to the RPS requirements. Therefore, electricity used at the site would not conflict with the pLAn's renewable energy strategies. No element of the Proposed Project would impede the City's progress toward renewable energy goals.
	pLAn-2. Local Water: Sourcing water locally uses less energy than purchasing water.	Water would be sourced from LADWP, which is subject to the State and City requirements.
	pLAn-4. ZEVs:	The Proposed Project's vehicle use would be subject to State vehicle regulations and requirements that are designed to accelerate the transition to zero-emission and low-emission vehicles.
	Reduce port-related GHG emissions by 80% by 2050.	Tugboats and on-site equipment would be subject to CARB's harbor craft and mobile equipment requirements and as such would not conflict with pLAn measures.
City of Los Angeles Construction and Demolition (C&D) Waste Recycling Ordinance	The City of Los Angeles approved a Citywide construction and demolition waste recycling ordinance in 2010. This ordinance requires all	*No Conflict.* This would include demolition waste generated by the Proposed Project. Los Angeles Sanitation District (LASAN) is responsible for the C&D waste recycling policy. All haulers and contractors responsible for handling C&D waste must obtain a Private Waste Hauler Permit from LASAN prior to collecting, hauling and transporting C&D waste, and C&D waste

Table 3.3.-3. Consideration of State and Local GHG-Reducing Plans and Policies

Plan or Policy	Plan/Policy Measure	Discussion
	mixed C&D waste generated within City limits be taken to City-certified C&D waste processors.	can only be taken to City certified C&D processing facilities. The Proposed Project would comply with City of Los Angeles C&D Ordinance.
City of Los Angeles General Plan – Mobility Element	The City of Los Angeles General Plan Mobility Element was developed to improve the way people, goods, and resources are moved in Los Angeles.	*No Conflict.* The Proposed Project, by using designated truck routes to and from the facility, would be consistent with this General Plan Element.
San Pedro Bay Ports CAAP: 2007, 2010 Update, 2017 Update	The 2006 CAAP and 2010 Update were primarily designed to reduce criteria pollutants and air toxics. However, many of the CAAP strategies would also reduce GHG emissions. The CAAP 2017 Update furthers the goals of the previous CAAPs and includes the following targets for GHG reduction: Reduce GHGs from port-related sources to 40% below 1990 levels by 2030. Reduce GHGs from port-related sources to 80% below 1990 levels by 2050.	*No Conflict.* The Proposed Project would not impede the Port's achievement of CAAP goals. The following CAAP initiatives related to GHG emission reductions would apply to Proposed Project activities: Vessel Speed Reduction Program – Approximately 95% of vessels visiting the Berths 210/211 complied with VSRP and would continue to do so in the future. Trucks used to bring metal to the facility are subject to the Port's Clean Truck Program. The facility uses Pacific Harbor Line (PHL) switcher locomotives to bring rail cars to the facility. PHL is required by the CAAP to maintain the cleanest available locomotives and to limit idling to 15 minutes. The facility uses a hybrid electric crane for ship loading.
LAHD 2009 Sustainable Construction Guidelines	All construction at the Port must adhere to the LAHD's 2009 Sustainable Construction Guidelines. The guidelines reinforce and require sustainability measures under construction contracts, addressing a variety of emission sources that operate at the Port during construction.	*No Conflict.* The Proposed Project is required to implement LAHD's Sustainable Construction Guidelines under a construction contract.

As shown in Table 3.3-1 above, the implementation of the Proposed Project would not conflict with any of the applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project's implementation would not create any new significant impacts under Impact GHG-2.

3.3.6.3 Informational Assessment: SLR

CEQA is concerned with SLR impacts on the physical environment. Thus, this SLR discussion has been included for informational purposes and no significance determination is made regarding SLR.

Global warming is a cumulative effect resulting in part from the accumulation of GHGs in the atmosphere. SLR refers to the long-term increase in the average level of the Earth's oceans and coastal areas and is primarily driven by global warming. Warmer temperatures cause glaciers and ice sheets, such as those in Greenland and Antarctica, to melt at an accelerated rate. The resulting meltwater flows into the oceans, contributing to SLR.

The rate and extent of SLR can vary regionally due to factors such as local land subsidence, oceanic circulation patterns, and gravitational effects. Although SLR is a global phenomenon and no single project can affect its overall trend, localized SLR, whether permanent or temporary, may affect coastal erosion, increased frequency of coastal flooding, saltwater intrusion into coastal aquifers, and threats to coastal ecosystems and infrastructure.

Recent estimates of SLR are discussed in Section 3.3.2.2, Climate Change as part of Section 3.3, Environmental Setting. All estimates predict some acceleration in SLR, but the rate of acceleration and inundation scenarios vary depending on global CO_2 concentrations and analysis year. Perhaps the best study of SLR effects at the Port is the Sea Level Rise Adaptation Study conducted by the Port of Los Angeles in 2018 to assess the potential impacts of rising sea levels on the Port's infrastructure and operations (POLA 2018). The Study assessed the Port's vulnerability to SLR, examined potential impacts of several SLR scenarios on critical port infrastructure, and identified adaptation strategies to manage the risks.

The Study assessed several SLR scenarios that represent a range of scenarios for planning and adaptation purposes. These scenarios included an SLR of 12 inches by the year 2030, 24 inches by the year 2050, and 37 inches by the year 2100. Additionally, each SLR scenario was assessed under two tide conditions: daily tidal levels and the 100-year storm tide, representing permanent inundation and temporary flooding, respectively. Since the Proposed Project is proposing a 10-year lease extension followed by an up to 5-year non-operational restoration period, the 12 inches in year 2030 would be the most relevant scenario for the Proposed Project. Furthermore, since the Study did not assess scenarios between 2030 and 2050, the 24 inches in year 2050 was also evaluated in this analysis.

Figure E-4 of the study shows that the Proposed Project site would remain free of inundation and flooding if sea level rises by 12 inches in the year 2030 and by 24 inches in the year 2050.

3.3.6.2 Summary of Impact Determinations

Table 3.3-4 provides a summary of the impact determinations of the Proposed Project related to GHG emissions. This table is meant to allow easy comparison of the potential impacts of the Proposed Project.

For each type of potential impact, the table describes the impact, notes the impact determinations, describes any applicable mitigation measures, and notes the impact remaining after mitigation. All impacts, whether significant or not, are included in this table.

Table 3.3-4. Summary Matrix of Potential Impacts and Mitigation Measures for GHG Emissions Associated with the Proposed Project

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts After Mitigation
Impact GHG-1: Would the Proposed Project generate GHG emissions, either directly or indirectly that would exceed the SCAQMD 10,000 mty CO_2e threshold.	No new significant impact would occur	Mitigation is not required	No new significant impact would occur
Impact GHG-2: Would the Proposed Project conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions	No new significant impact would occur	Mitigation is not required	No new significant impact would occur

3.3.6.3 Mitigation Monitoring

No mitigation is required.

3.1.7 SIGNIFICANT UNAVOIDABLE IMPACTS

Implementation of the Proposed Project would not cause any new significant and unavoidable impacts.

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Section 3.4

Hazards

Section Summary

This section addresses the potential impacts of hazards and hazardous materials related to the Proposed Project and discusses related impacts to the environment. This section also describes impacts on public health and safety that could result from implementation of the Proposed Project.

Section 3.4, Hazards, provides the following:

- A description of the existing environmental setting in the Port of Los Angeles (POLA or Port) area;
- A description of the existing hazards/hazardous substances handled at the Project site;
- A discussion on the methodology used to determine whether the Proposed Project would adversely change the existing physical conditions or increase impacts related to hazards and hazardous materials;
- An impact analysis of the Proposed Project; and
- A description of any mitigation measures proposed to reduce any potential impacts and residual impacts, as applicable.

Key Points

The previous 1996 Certified EIR evaluated the potential for fire, explosion, or accidental release of hazardous materials during operations and the risk of soil and groundwater contamination. Risks were found to be acceptable and no mitigation was recommended.

The proposed Phase 1 – Continued Operations Period could result in future degradation of the existing concrete and asphalt cap, which could create a new significant hazard to the public or environment. Mitigation in the form of a maintenance plan for the existing cap (MM-HAZ-1) would be required to ensure the cap is appropriately maintained. No new significant impact would occur with the implementation of this mitigation.

The proposed Phase 2 – Non-operational Restoration Period would include demolition of all site structures that could contain hazardous building materials. This could potentially result in a release of hazardous materials during routine demolition activities, creating a new significant impact to the public and on-site workers. Mitigation in the form of a pre-demolition hazardous materials survey (MM-HAZ-2) and abatement plan would be required. No new significant impact would occur with the implementation of this mitigation.

The Proposed Project would not result in any other new or substantially more severe significant impacts or any significant and unavoidable impacts related to hazards.

3.4.1 INTRODUCTION

The Initial Study/Notice of Preparation (IS/NOP) prepared for the Proposed Project in March 2023 found that the Proposed Project would need to be analyzed under recent regulations with regard to the routine transport, use or disposal of hazardous materials, and additional analysis would be conducted to determine if new significant or cumulatively considerable impacts could occur. The IS/NOP also found that the Proposed Project needs to be further analyzed to determine if it could result in reasonably

foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Finally, the IS/NOP also found that the Proposed Project is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and the issues related to this listing would be further evaluated with regard to potentially significant hazards to the public or the environment. These findings were based on a review of existing operations, current regulations, and ongoing remediation actions under regulatory oversight (see Appendix A, IS/NOP, of this Draft SEIR). This section evaluates the significance of these potential impacts.

This section is based on the findings of the Hazardous Materials Technical Report prepared for the Applicant's Facility and Proposed Project (Dudek 2024).

3.4.2 ENVIRONMENTAL SETTING

3.4.2.1 Hazardous Materials

Hazardous materials are the raw materials for a product or process that, according to Department of Transportation are capable of posing significant risk to health, safety, or property when transported. The State of California classifies hazardous materials as "any material that, because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or the environment if released into the workplace or environment" (HSC 25260). Classes of hazardous materials that may be used at or transported to the Proposed Project site include flammable materials, toxic materials, and corrosive materials. Examples of these hazardous materials, as described in the stormwater pollution prevention plan (SWPPP; Maine and Peterson 2021) include diesel fuel, gasoline, hydraulic oil, lead-acid batteries, polychlorinated biphenyl (PCB) capacitors and ballasts, and alkaline batteries. These hazardous materials are removed from recyclable materials before they're processed.

3.4.2.2 Hazardous Wastes

In addition to hazardous materials, hazardous wastes can be generated at the site as part of daily operations at the site. Hazardous wastes are defined in the Health and Safety Code (HSC) 25141 as wastes that, due to the concentrations, quantity, or characteristics may cause mortality or significant, irreversible illness, and/or pose a present or potential hazard to human health or the environment. These are further defined in California Code of Regulations (CCR) Title 22 Article 3, "Characteristics of Hazardous Waste," Sections 66261.20 through 66261.24. These may include toxic, flammable, corrosive, or radioactive materials. There are also universal wastes, such as light ballasts and batteries. Hazardous wastes generated by the Proposed Project typically are associated with wastes found in scrapped materials, which may include waste oils, waste batteries, waste coolants, spent dust collector filters, and non-Resource Conservation and Recovery Act (RCRA) hazardous wastes.

Operations also create treated auto shredder residue, also defined as chemically treated metal shredder residue (CTMSR). In the late 1980s, the Department of Health (predecessor of the Department of Toxic Substances Control [DTSC]) determined that the metal treatment fixation process of metal shredder waste (i.e., CTMSR) was capable of lowering soluble concentrations of contaminants of concern in metal shredder residue such that the waste was rendered insignificant as a hazard to human health and safety, livestock, and wildlife. Seven facilities applied for and were granted nonhazardous waste classification letters by the Department of Health (and later DTSC), so long as they continued to use fixation technologies for metal shredder residue. The authority was issued under CCR Title 22 Section 66260.200(f), and the authorization is known as an (f) letter. With this (f) letter authorization, CTMSR is considered non-hazardous waste.

3.4.2.3 Current and Historical Site Uses

The Proposed Project site is located on Terminal Island, which was originally tidelands along a strip of land called Rattlesnake Island. Beginning in the early 1900s, the area was filled with dredged materials to create Terminal Island. During World War II (the 1930s and 1940s), the site and surrounding area was used for naval vessel construction. In 1946, the dry docks used for ship construction were dismantled and the area was further filled with dredged sediments; sediments were laid on top of dismantling debris and likely miscellaneous material from open dumping (Mittelhauser 1994). Ship dismantling occurred on the site after World War II (late 1940s) through the early 1960s.

Multiple oil and gas wells were drilled on the Proposed Project site in the 1950s. The wells were owned by Exxon Corporation (now Exxon Mobil Corporation) and drilled under oil lease "TUA-1". Well numbers included TUA-1 171 through TUA-1 181. In 1991, permits were issued to abandon the wells; abandonment was completed in 1992 during Hugo Neu-Proler's occupancy, as discussed in the next paragraph.

As described in Section 2.4.5 of this SEIR, the Proposed Project site is currently operated as a scrap metal recycling facility. Scrap metal recycling operations began in 1962 under Hugo Neu-Proler. In October 2005, Hugo Neu Corporation (owner/operator of the Hugo Neu-Proler Site) was acquired by Sims Group Limited. The company applied for a subsidiary name change from Hugo Neu-Proler to Sims Hugo Neu West in October 2005. In September 2007, Sims Group merged with Adams Steel, creating SA Recycling. SA Recycling (the Applicant) continued operations at the site beginning as of September 1, 2007 (DTSC 2011). As part of the Proposed Project, scrap metal recycling operations would continue for up to 10 years.

As noted in Section 3.4.2.2 and discussed in the Hazardous Materials Technical Memo (Sections 5 and 3.3, Dudek 2024), metal shredding activities at the site are covered under an (f) letter authorization, which was issued to Hugo Neu-Proler and transferred to the Applicant when they took over operations in 2007.

3.4.2.4 Previous Environmental Investigations and Site Conditions

As outlined in the Hazardous Material Technical Report (Dudek 2024), multiple historical and ongoing environmental investigations, monitoring, and remedial actions have occurred on the Proposed Project site. In summary, these actions include:

- A site characterization, remedial action plan (RAP), and feasibility study for remediation of soil contamination (March 1994).
- Soil remediation under Waste Discharge Requirement (WDR) No. 96-020 issued by Los Angeles Regional Water Quality Control Board (LARWQCB), with concurrent monitoring and reporting of groundwater conditions under monitoring and reporting program (MRP) No. 7656 (1996 through 2003).
- Ongoing monitoring and remediation of a free phase hydrocarbon contamination plume (also referred to as a light non-aqueous liquid [LNAPL] plume) on groundwater beneath the Project site under LARWQCB File 90-47 (1988 through present day).
- Investigation outlined in a Site Characterization Work Plan prepared in accordance with Section 8(c)(2) of Permit 750, approved by LARWQCB on July 14, 2023, and DTSC on September 7, 2023 (GSI 2023a). The results of the investigation were summarized in a Site Characterization Report, submitted to both POLA and DTSC in November 2023 (GSI 2023b).

In addition, DTSC issued the Applicant an Enforcement Order for Corrective Action ("Corrective Action Order" or CAO) identifying both on and off-site impacts associated with release of hazardous material

constituents (as defined item 1.4 of the CAO and CCR Title 22 Section 66261.24). This CAO, Docket No. HWCA-FY20/21-015, was issued in October 2021, and stated that hazardous waste or hazardous waste constituents are present both on and off site and are caused by ongoing operations. While the facility operates under an (f) letter authorization, which allows characterization of CTMSR as non-hazardous waste for disposal purposes, DTSC's CAO claims additional hazardous waste constituents have been identified due to on-site operations and, therefore, must be appropriately mitigated and managed.

Following issuance of the CAO, the Applicant and DTSC entered into a Consent Order, Docket No. HWCA 20187418, issued on December 12, 2023 (included herein as Appendix E-1), which supersedes the CAO. The Consent Order alleges violations to the health and safety code (HSC) observed at the Project site by DTSC, including improper/unlawful stockpiling/storage of materials with hazardous waste constituents, resulting in potential releases to the environment (Violations 3.1 and 3.2); off-site migration of hazardous material constituents (Violations 3.3 and 3.4); improper handling of on-site water in the water treatment system, resulting in potential release of hazardous materials on site (Violations 3.5 and 3.6); acceptance, treatment, storage, and disposal of hazardous wastes without a permit or authorization (Violation 3.7); and on-site accumulation of materials with hazardous waste constituents, failing to minimize possible releases of hazardous wastes to the environment (Violations 3.8, 3.9, and 3.10). The Applicant admitted to alleged violations 3.3, 3.4, 3.8, 3.9, and 3.10. Compliance requirements are outlined in the Consent Order, including Exhibit A. Alleged off-site violations have been addressed by investigation and cleanup/removal of off-site CTMSR (light fibrous material (LFM)) as outlined in the Off-Site LFM Investigation Work Plan (Appendix E-2). Continuing evaluation and cleanup of any off-site releases will occur as described in the Off-site LFM Investigation Work Plan and Off-Site LFM Cleanup/Removal Work Plan (Appendix E-3). The Applicant has come into compliance with some of the alleged violations, and agreed to come into compliance with all alleged violations and provide DTSC with evidence of changes within the schedule outlined in the Consent Order. Exhibit A requires interim and permanent corrective actions and measures to prevent the disposal of hazardous substances and wastes, and preparation and submittal of a current conditions report within 90 days. Exhibit A also includes procedural provisions required for ongoing operations, including preparation of California Environmental Quality Act (CEQA) documentation, land use covenants, operations and maintenance plans, health and safety plans, a community profile, and a selected remedy for remediation of contamination identified in the recent site investigation as necessary (GSI 2023b) (discussed further below). Exhibit A also requires, as part of the site investigation (GSI 2023a, 2023b), an investigation for per- and polyfluoroalkyl substances (PFAS) in soil and groundwater.

The aforementioned investigations have resulted in the following findings. These findings, summarized below, are discussed in further detail in the Hazardous Materials Technical Report (Dudek 2024):

- Historical operations have resulted in impacts to soil and groundwater at the site, including an existing LNAPL plume, which is currently undergoing monitoring and remediation (LARWQCB File 90-47). The plume is limited to the area beneath the stormwater treatment area and warehouse, and monitoring results indicate diesel and volatile organic compounds (VOC) concentrations are decreasing over time. The LARWQCB Case is a Leaking Underground Storage Tank (LUST) case that occurred in 1988 and is currently open.
- Soil remediation has occurred on the site under WDR Order No. 96-020, which consisted of excavation of soils impacted with petroleum hydrocarbons, VOCs, semi-volatile organic compounds (SVOCs), PCBs, and metals; off-site disposal of said soils; and placement of a concrete cap (cap) across the site. WDR Order No. 96-020 was terminated in 2012 following completion of soil remediation, placement of a concrete cap over remaining impacted soils, and groundwater monitoring efforts. However, cleanup levels specified in the WDR Order,

issued in 1996, are no longer deemed protective, and are not likely to meet present-day regulatory screening levels.

- The existing concrete cap is at least 6 inches thick (up to 24 inches thick) with only minor cracks and no evidence of degradation causing exposure of underlying soils (GSI 2023b). Present-day soil conditions meet cleanup levels established in the 1996 WDR (except mercury in one location at 27 mg/kg, above the WDR cleanup level of 20 mg/kg) (LARWQCB 1996). However, concentrations of arsenic, lead, mercury, and PCBs (Aroclor 1260) in select locations are above present-day screening levels for commercial/industrial use (DTSC screening levels for commercial/industrial soil [DTSC 2022]) (GSI 2023b). Similarly, present-day groundwater samples have concentrations of arsenic, beryllium, and molybdenum above present-day screening levels for tap water (DTSC screening level for tap water [DTSC 2022]), in addition to the LNAPL plume (GSI 2023b). Concentrations of arsenic and molybdenum are slightly higher than those observed during monitoring for the WDR (Clayton Environmental 2002). Present-day soil and groundwater screening levels are lower than those established for the WDR in 1996, resulting in observed exceedances as noted above. The impacted soils are beneath a concrete cap that is at least 6 inches thick, and groundwater beneath the Project site is not used for drinking water.
- As outlined in the Consent Order, on- and off-site samples collected by DTSC between 2017 and 2022 have identified wastes stored on the site that exhibit characteristics of hazardous waste due to exceedances of the toxicity criteria defined under CCR Title 22 Section 66261.24, and there was evidence of off-site migration of these hazardous waste constituents. The Consent Order legally requires the Applicant to address the alleged violations identified by DTSC, and includes both on-site and off-site corrective actions and a schedule of implementation. Corrective actions include completion of a supplemental site investigation (to supplement the 2023 Site Investigation [GSI 2023b]), and selection of remedies for contamination identified both the 2023 Site Investigation and any supplemental investigations.

3.4.3 REGULATORY SETTING

3.4.3.1 Federal Regulations

U.S. Environmental Protection Agency

Title 40 USC, Chapter 1, Subchapter I, Parts 260-265 – Solid Waste Disposal Act/Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the RCRA, establishes requirements for the management of solid wastes (including hazardous wastes), landfills, underground storage tanks, and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; and research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 USC, Chapter 1, Subchapter I, Part 273 – Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 USC, Chapter 1, Subchapter D, Part 112 – Oil Pollution Prevention

Oil Pollution Prevention regulations require the preparation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan if oil is stored in excess of 1,320 gallons in aboveground storage (or have a buried capacity of 42,000 gallons). SPCC regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names asbestos-containing material (ACM) as one of these materials. ACM use, removal, and disposal are regulated by United State Environmental Protection Act (USEPA) under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

Title 42 U.S. Code of Federal Regulations, Chapter 116 – Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) provides for public access to information about chemical hazards. The EPCRA and its regulations included in Title 40 U.S.C. Parts 350-372 establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. USEPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Title 15 USC, Chapter 53, Subchapter I, Section 2601 et seq. – Toxic Substances Control Act of 1976

The Toxic Substances Control Act (TSCA) of 1976 empowers USEPA to require reporting, record-keeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and also sets requirements for the use, handling, and disposal of ACM as well as for lead-based paint (LBP) waste. As discussed above, USEPA has also established National Emission Standards for Hazardous Air Pollutants (NESHAP), which govern the use, removal, and disposal of ACM as a hazardous air pollutant and mandate the removal of friable ACM before a building is demolished and require notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of PCBs and sets standards for the use and disposal of existing PCB-containing equipment or materials.

Title 42 U.S. Code of Federal Regulations, Section 9601 – Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101 – Definitions

CERCLA provides for the cleanup of uncontrolled or abandoned hazardous wastes sites as well as accidents, spills, and other emergency releases of hazardous substances. CERCLA Section 101 [42 U.S.C. Section 9601] provides definitions for terms used throughout CERCLA, including *hazardous substance*, *toxic pollutants, hazardous air pollutants, hazardous waste,* and *release.*

Hazardous Substance: CERCLA Section 101(14) defines "hazardous substance" by reference to lists of substances designated under specific authorities. The CERCLA list of hazardous substances (40 Code of Federal Regulations [CFR] part 302.4) is currently comprised of the following lists:

- Clean Water Act (CWA) Hazardous Substances per CWA Section 311(b)(2) [40 CFR 116.4; 33 U.S.C. 1321(b)(2)]

- CWA Toxic Pollutants per CWA Section 307(a) [40 CFR 401.15, 40 CFR part 423 Appendix A, and 40 CFR 131.36; 33 U.S.C. 1317(a)]
- CAA Hazardous Air Pollutants per CAA Section 112(b) [33 U.S.C. 7412(b); P.L. 102-187 December 4, 1991; 70 FR 75047, December 19, 2005; 69 FR 69320, November 29, 2004; 61 FR 30816, June 18, 1996; 65 FR 47342, August 2, 2000, and 87 FR 393, January 5, 2022]
- RCRA Hazardous Wastes per RCRA Section 3001 [40 CFR part 261 Subpart D – Lists of Hazardous Wastes; 42 U.S.C. 6921]

Release: CERCLA Section 101(22) defines "release" as any "…spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant)."

Title 42 U.Sb. Code of Federal Regulations, Section 9602 – CERCLA Section 102 – Reportable Quantities

CERCLA Section 102 authorizes the Administrator to revise the substances specified as hazardous under CERCLA Section 102 and designate additional hazardous substances. Furthermore, CERCLA Section 102 assigns a Reportable Quantity of one pound to each hazardous substance and authorizes USEPA to promulgate regulations to revise the statutory Reportable Quantity. The Reportable Quantity identifies the quantities of substances that if released require notification and sets forth the notification requirements for releases of these substances.

The CERCLA List of Hazardous Substances and their Reportable Quantities are found in 40 CFR part 302, Table 302.4

Regional Screening Levels (RSLs)

The federal USEPA provides RSLs for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision-making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, the DTSC Human and Ecological Risk Office (HERO) incorporated the USEPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment (HHRA) Note 3, which incorporates HERO recommendations and DTSC-modified screening levels (DTSC-SLs) based on review of the USEPA RSLs. The DTSC-SL should be used in conjunction with the USEPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 USC, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.

Title 29 USC, Part 1910 et seq. – Occupational Safety and Health Standards

Under this regulation, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training; inventory safety equipment relevant to potential hazards; have knowledge on safety equipment use; prepare an illness prevention program; provide hazardous substance exposure warnings; prepare an emergency response plan; and prepare a fire prevention plan.

U.S. Department of Transportation

Title 49 USC, Part 172, Subchapter C – Shipping Papers

The Department of Transportation established standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes, as well as training requirements for personnel completing shipping papers and manifests.

3.4.3.2 State Regulations

California Unified Program for Management of Hazardous Waste and Materials

California HSC, Division 20, Chapter 6.11, Sections 25404- 25404.9 Sections– Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the California Environmental Protection Agency (CalEPA), the DTSC and Enforcement and Emergency Response Program (ERP) administer the technical implementation of California's Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (DTSC 2019). Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards. This program was established under the amendments to the California HSC made by Senate Bill 1082 in 1994. The programs that make up the Unified Program are:

- Aboveground Petroleum Storage Act (APSA) Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans, or HMBPs)
- Hazardous Material Management Plan (HMMP) and Hazardous Material Inventory Statements (HMIS)
- Hazardous Waste Generator and On-Site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the Project site is the Los Angeles County Fire Department.

Title 19 CCR, Chapter 2, Subchapter 3, Sections 2729-2734/California HSC Division 20, Chapter 6.95, Sections 25500–25520

This regulation requires the preparation of an HMBP by facility operators. The HMBP identifies the hazards, storage locations, and storage quantities for each hazardous chemical stored on site. The HMBP is submitted to the CUPA for emergency planning purposes. The Project site is currently subject to these requirements and there is an HMBP in place.

Hazardous Waste Management

Title 22 CCR, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste

In the State of California, the DTSC regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31 – Waste Minimization, Article 1 – Pollution Prevention and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every 4 years and, as applicable, select and implement viable source reduction alternatives. This Act does not apply to non-typical hazardous waste, including ACMs and PCBs, among others.

Title 22 California HSC, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

Human Health Risk Assessment Note 3 –DTSC-Modified Screening Levels (DTSC-SLs)

HHRA Note Number 3 presents RSLs (derived from the USEPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-SL should be used in conjunction with the USEPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

Chapter 50, Article 1, Section 68400.5 and Chapter 51, Article 2, Sections 69020 through 69022.

DTSC's HHRA guidance and process also allows the calculation of site-specific screening levels for individual cleanup sites, based on site-specific characteristics, human health and ecological exposure scenarios, and toxicity criteria.

Aboveground and Underground Petroleum Storage Tanks

Title 22 California HSC, Division 20, Chapter 6.67, Sections 25270 to 25270.13 – Aboveground Petroleum Storage Act

This law applies if a facility is subject to SPCC regulations under Title 40 U.S.C. Part 112, or if the facility has 10,000 gallons or more of petroleum in any or combination of above ground storage tanks and connecting pipes. If a facility exceeds these criteria, it must prepare a SPCC plan.

Low-Threat Underground Storage Tank Case Closure Policy

This policy applies to petroleum underground storage tank sites subject to Chapter 6.7 of the HSC. This policy establishes both general and media-specific criteria. If both the general and applicable media-specific criteria are satisfied, then the LUST case is generally considered to present a low threat to human health, safety and the environment. This policy recognizes, however, that even if all of the specified criteria in the policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the policy inappropriate.

Regional Water Boards and local agencies have been directed to review all cases in the Petroleum Underground Storage Tank Cleanup Program using the framework provided in this policy. These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each underground storage tank case meets the criteria in this policy or is otherwise appropriate for closure based on a site-specific analysis.
2. If the case does not satisfy the criteria in this policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.
3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site in a format acceptable to the Executive Director.

Environmental Cleanup Levels

Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs were developed by San Francisco Bay Regional Water Quality Control Board; however, they are used throughout the state. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California currently use the ESLs (as opposed to RSLs). In general, the ESLs could be used at any site in the State of California, provided all stakeholders agree (SFBRWQCB 2019). In recent experience, regulatory agencies in various regions use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to a LUST; those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

California Department of Transportation/California Highway Patrol

Title 13 CCR, Division 2, Chapter 6

California regulates the transportation of hazardous waste originating or passing through the state. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakage and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP. CHP conducts regular inspections of licensed transporters to ensure regulatory compliance. Caltrans has emergency chemical spill identification teams at locations throughout the state.

Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

Occupational Safety and Health

Title 8 CCR – Safety Orders

Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration (CalOSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the CCR. CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances. The hazard communication program also requires that Material Safety Data Sheets be available to employees and that employee information and training programs be documented.

In Division 1, Chapter 4, Subchapter 4 – Construction Safety Orders of Title 8, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

CalOSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations 8 CCR 1529. Only a CalOSHA-Certified Asbestos Consultant (CAC) can provide asbestos consulting (as defined by the Business and Professions Code, 7180–7189.7, and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement project design, contract administration, supervision of site surveillance technicians, sample collection, preparation of asbestos management plans, and clearance air monitoring.

Asbestos and Air Quality

Enforcement of the NESHAP Regulation, HSC Section 39658(b)(1)

The California Air Resources Board (CARB) is responsible for overseeing compliance with the federal Asbestos NESHAPs in Los Angeles County. The Asbestos NESHAP Program enforces compliance with the federal NESHAP regulation for asbestos and investigates all related complaints, as specified by HSC Section 39658(b)(1). Of the 35 air districts in California, 16 of these districts do not have an asbestos program in place. In these “non-delegated” districts, a demolition/renovation notification is required for compliance with the Asbestos NESHAP. (This notification is not equivalent to a permit.) CARB reviews and investigates the notifications. The program also administers two annual statewide asbestos NESHAP task force meetings for air districts and USEPA to facilitate communication and enforcement continuity, and assists USEPA in training district staff to enforce the asbestos NESHAP.

Contractors State License Board

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

LBP

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner. The specific regulations are as follows:

California Health & Safety Code Section 105250

Establishes a program to accredit lead-related construction training providers and certify individuals to conduct lead-related construction activities.

California Civil Code Sections 1102 to 1102.16

Requires the disclosure of known LBP hazards upon sale of a property.

California Labor Code Sections 6716 to 6717

Provides for the establishment of standards that protect the health and safety of employees who engage in lead-related construction work, including construction, demolition, renovation, and repair.

California Health & Safety Code Sections 116875 to 116880

Requires the use of lead-free pipes and fixtures in any installation or repair of a public water system or in a facility where water is provided for human consumption.

California Health & Safety Code Sections 105185 to 105197

Establishes an occupational lead poisoning prevention program to register and monitor laboratory reports of adult lead toxicity cases, monitor reported cases of occupational lead poisoning to ascertain lead poisoning sources, conduct investigations of take-home exposure cases, train employees and health professionals regarding occupational lead poisoning prevention, and recommended means for lead poisoning prevention.

California Accidental Release Prevention Program

Similar to the USEPA Risk Management Program, the California Accidental Release Prevention (CalARP) Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit a HMBP to the local CUPA via the California Environmental Reporting System. As part of the HMBP, a facility is further required to specify applicability of other state regulatory programs. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the USEPA Risk Management Program, which was established pursuant to the Clean Air Act Amendments.

California Dig Alert

CA Government Code 4216

In accordance with CA Government Code 4216.2, an excavator planning to conduct an excavation shall notify the appropriate regional notification center of the intent to excavate between 2 and 14 calendar days prior to excavation activities. When the excavation is proposed within 10 feet of a "high priority subsurface installation," which includes high pressure natural gas and petroleum pipelines, the operator of the high priority subsurface installation shall notify the excavator of the existing of the installation and set up an on-site meeting to determine actions required to verify location and prevent damage to the installation. The excavator shall not begin excavating until the on-site meeting is complete.

3.4.3.3 Local Regulations

South Coast Air Quality Management District (SCAQMD)

Rule 1403: Work Practice Requirements for Asbestos

SCAQMD Rule 1403 governs work practice requirements for asbestos in all renovation and demolition activities. The rule includes requirements for asbestos surveying, notifications, ACM removal procedures, schedules, handling and clean-up procedures, and storage, disposal, and landfill requirements for waste materials. All operators are also required to maintain records and use appropriate labels, signs, and markings.

Rule 1466: Control of Particulate Emissions from Soils with Toxic Air Contaminants

SCAQMD Rule 1466 is designed to minimize the amount of off-site fugitive dust emissions containing toxic air contaminants by reducing particulate emissions in ambient air during earth-moving activities. The rule applies to any owner or operator conducting earth-moving activities of soil with toxic air contaminants. Operators must apply appropriate management practices to reduce potential air emissions.

Rule 403: Dust Control Information

SCAQMD Rule 403 applies to any activity capable of generating fugitive dust, including earth-moving activities, and requires best available dust control measures to be applied during activities capable of generating fugitive dust. Operations on properties of 50 or more acres, or any earth-moving activities with daily throughput of 3,850 cubic meters ore more three times in one 365-day period are considered large operations, and have additional requirements, including notifications and reports to be submitted to SCAQMD, and require trained personnel to oversee operations.

Rule 1166: Volatile Organic Compound Emissions from Decontamination of Soil

SCAQMD Rule 1166 sets requirements to control the emissions of VOCs during excavation, grading, handling and treating VOC-contaminated soil. Persons who plan to excavate underground storage tanks or associated piping shall follow requirements set forth in the Rule, including permitting, notification, and air monitoring. Additionally, rules apply to persons handling VOC-contaminated soils, including segregation, wetting to reduce dust, and visual inspections of stockpiles.

Los Angeles County Methane Zones

Los Angeles County Code Title 26, Sections 110.3, 110.4, and 110.5, amended by Ordinance No. 2019-0056: Methane Mitigation Standards

The County of Los Angeles, Department of Public Works has developed methane policies and mitigation standards for construction within designated methane zones. Policies include construction and mitigation requirements when potential gas hazards are within 1,000 feet of fill sites containing disposable materials, within 300 feet of a nearby oil and gas wells, or on contaminated soils. The policies also include standard specifications for methane gas mitigation.

City of Los Angeles Methane Mitigation Standards

Los Angeles City Ordinance 180619 and 175790, Methane Code

The City of Los Angeles has established methane codes for new construction, including the requirement for mitigation within a methane zone or methane buffer zone. The Los Angeles Building Department has authority to withhold permits on projects located within methane zones or methane buffer zones if plans do not properly show adequate protection against flammable gas incursion by installation of methane mitigation systems.

3.4.4 METHODOLOGY

Hazards and hazardous materials impacts were evaluated based on current operations and the findings of the Hazardous Materials Technical Report (Dudek 2024). This section evaluates the presence of hazards and hazardous materials as they relate to the proposed Phase 1 - Continued Operation of the Proposed Project for up to an additional 10 years and the up to 5-year Phase 2 - Non-operational Restoration Period of the Proposed Project

3.4.5 THRESHOLDS OF SIGNIFICANCE

The significance criteria used to evaluate the Project impacts related to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hazards and hazardous material would occur if the Project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. 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.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as result, would it create a significant hazard to the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

As discussed in Section 3.4.1, Introduction, the IS/NOP (Appendix A) identified less-than-significant impacts related to threshold 3) emission of hazardous materials within 0.25 miles of a school, threshold 5) safety or noise hazards near an airport, threshold 6) impairment of emergency response or evacuation plans, and threshold 7) wildfire risks. As such, these are not discussed in the subsequent sections.

3.4.6 IMPACT DETERMINATION

3.4.6.1 Impact HAZ-1: Would the Proposed Project create a significant hazard to the public through the routine transport, use or disposal of hazardous materials?

Findings in the 1996 Final EIR

The previous 1996 Certified EIR evaluated the potential for fire, explosion, or accidental release of hazardous materials during operation of the 1996 Approved Project. The 1996 Approved Project included improvements to site operations and layout, including new fire suppression equipment, new aboveground fuel storage tanks, shredder residue storage facilities, and implementation of written contingency and inspection plans. Operations included inspection and sorting of incoming materials to identify and separate hazardous materials for appropriate disposal. The analysis determined the potential for an accidental release was categorized as catastrophic, but the risk was categorized as acceptable, and no mitigation was recommended.

Impacts of the Proposed Project

As discussed in the Hazardous Materials Technical Report (Dudek 2024) and in the Consent Order (Appendix E-1), evidence of off-site migration of hazardous waste and hazardous waste constituents (as defined in CCR Title 22 Section 66261.24) was documented in multiple on-site inspections and sampling events conducted by DTSC between February 2017 and January 2022. Interim investigations and cleanup actions were completed by the Applicant (GSI 2022a), and further inspections conducted by DTSC from January 2022 to present did not result in findings of additional violations. As outlined in the Consent Order, the Applicant is required to implement further investigation and cleanup actions, as outlined in the Off-Site LFM Investigation Work Plan (Appendix E-2) and Off-Site LFM Cleanup and Removal Action Work Plan (Appendix E-3), which would investigate and evaluate for the presence of CTMSR (LFM) within a 0.5-mile radius and remove off-site materials that contain hazardous waste constituents. Remedial actions are currently underway, as outlined in the Work Plans, and DTSC can legally enforce these actions under the Consent Order.

Phase 1 Continued Operations

Hazardous Waste Violations

Operations would continue during Phase 1 in accordance with all applicable permits and authorizations, including Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, National Pollutant Discharge Elimination System (NPDES) permits (reference Section 3.5, Hydrology and Water Quality), and air discharge permits under Title V (reference Section 3.1, Air Quality and Meteorology). As outlined in the Consent Order (Appendix E-1), response actions are required and legally enforceable by DTSC, which will address the alleged hazardous waste violations identified in the CAO and Consent Order, including off-site migration of hazardous waste constituents and on-site hazardous waste handling procedures (hazardous waste as defined in CCR Title 22 Section

66261.24). Consent Order Section 9 outlines the Applicant's required compliance actions to address all alleged violations noted by DTSC (Violations 3.1 through 3.10), which are summarized as follows:

- Violations 3.1 and 3.2 (improper/unlawful stockpiling/storage of materials with hazardous waste constituents, resulting in potential releases to the environment) have been corrected.
- Violations 3.3 and 3.4 (off-site migration of hazardous material constituents) have already undergone corrective actions (GSI 2023a) will be further evaluated and corrected as outlined in Exhibit A of the Consent Order.
- Violations 3.5 and 3.6 (improper handling of on-site water in the water treatment system, resulting in potential release of hazardous materials on site) will be corrected either through installation of a filter press in the water treatment system, which will be Permit by Rule authorized, or by otherwise capturing the water dripping from the gridded sieve bins.
- Violation 3.7 (acceptance of loads with hazardous waste constituents) will be corrected through preparation and implementation of an acceptance policy and quality control procedures for determination of acceptable loads.
- Violations 3.8 through 3.10 (on-site accumulation of materials with hazardous waste constituents, failing to minimize possible releases of hazardous wastes to the environment) will be corrected as outlined in Exhibit A of the Consent Order.

With implementation of legally enforceable action items outlined in the Consent Order (Appendix E-1), including implementation of off-site investigations and cleanup actions (Appendices E-2 and E-3), no new or substantially more severe impacts associated with hazardous waste and hazardous material handling violations would occur.

Asphalt and Concrete Cap

As discussed in the Hazardous Materials Technical Report (Dudek 2024) and in Section 3.4.2.4, Previous Environmental Investigations and Site Conditions, remedial actions that took place on the Project site under WDR Order No. 96-020 are no longer deemed protective of human health and the environment as they do not meet current regulatory screening criteria. Additionally, while recent evaluation determined the cap to be in good condition (GSI 2023b), there are no requirements in the WDR termination (LARWQCB 2012), nor are there BMPs in the SWPPP to address potential degradation of the existing cap originally placed in 2002 to contain remaining contaminated soils. The Phase 2 non-operational restoration of the Proposed Project, as discussed below, would remove the existing cap and require excavation of contaminated soils. Soils, concrete, and asphalt materials (parking lot) removed would be characterized and disposed of in accordance with applicable federal and state rules and regulations. While remediation and restoration would ultimately mitigate future impacts and the Project would ultimately result in a positive impact by removing contaminated soils, ongoing use without appropriate maintenance of the existing cap over the proposed 10-year operating period could result in future degradation of the existing cap and releases of contaminated soils prior to remediation, which could create a new significant hazard to the public or environment. Mitigation would be required.

Groundwater Contamination

The groundwater contamination plume beneath the site is undergoing remediation, and the size of the plume continues to decrease. Continued operation of the Proposed Project would include continued remediation and monitoring of the groundwater contamination plume under LARWQCB File 90-47, which is scheduled to continue until the groundwater reaches cleanup criteria established in the 1997 RAP (Clayton Environmental 1997) and/or as deemed complete by the regulatory agency and the Los Angeles Harbor Department (LAHD). As such, continued operation of the Proposed Project may result

in a reduced impact due to the groundwater contamination plume, and no new significant impacts would occur.

The Site Characterization (GSI 2023a, 2023b) also included investigation of groundwater, as discussed in Section 3.4.2.4. Exhibit A of the Consent Order states DTSC has received the Site Characterization Report for review and comment. Under the Consent Order, DTSC will review the Site Characterization Report along with other submitted data (including the 90-day progress report required by the Consent Order) and determine data gaps and additional investigation or measures required at the Project site.

Phase 2 Non-operational Restoration Period

Fugitive Dusts and Emissions of Toxic Air Pollutants

Restoration activities during the Phase 2 Non-operational Restoration Period have the potential to cause fugitive dusts and emissions of toxic air pollutants due to excavation of contaminated soils. SCAQMD Rules 1466, 1166, and 403 require dust and VOC control measures and monitoring to prevent impacts to public health or the environment. Excavation activities may also fall under WDRs specific to the Los Angeles region, which would be determined by LARWQCB. As outlined in Chapter 2, Project Description, excavation of soils would occur until remaining soils meet established regulatory cleanup goals for the site based on proposed future land use. The excavated areas would be backfilled with clean soil that, at a minimum, meets clean fill criteria set forth in LAHD's Environmental Guidance for Industrial Fill Material. Removal, transportation, and disposal of hazardous wastes and materials with hazardous waste constituents, and handling of hazardous materials during construction activities, would all be conducted in accordance with federal, state, and local rules and regulations. These rules and regulations include reporting, safety measures, and spill prevention techniques to reduce the potential for impacts to public safety or the environment. No new significant impacts or substantially more severe impacts beyond those previously analyzed would occur.

Hazardous Building Materials

The Phase 2 - Non-operational Restoration activities of the Proposed Project would include demolition of all site structures. Based on the age of the structures, asbestos, lead-based paint, and other hazardous building materials could be present. Although SCAQMD Rule 1403 requires all demolition projects undergo an inspection for asbestos and appropriate abatement of identified materials, demolition of these structures without proper abatement would potentially result in a release of hazardous materials during routine demolition activities, creating a new significant impact to the public and on-site workers. Mitigation would be required.

Mitigation Measures Applicable to the Proposed Project

MM-HAZ-1: **Maintenance of the Existing Cap.** The existing cap shall, at all times during the continued operations of the Proposed Project, prior to the deconstruction activities, meet the requirements of A.6 of the WDR, which includes a minimum of 6 inches of concrete pavement over a minimum of 8 inches of base rock or base material. A maintenance schedule shall be prepared and implemented that addresses ongoing maintenance and repair of the concrete cap. The schedule shall be reviewed and approved by LAHD. Inspections will be conducted by the site operator; inspection reports will be submitted to LAHD for review prior to finalization and/or submittal to any regulatory agency. Additionally, LAHD shall have authority to conduct regular cap inspections as outlined in the maintenance schedule to verify cap integrity and confirm the maintenance and repair schedule is being appropriately implemented. In addition

to LAHD oversight, a workplan must be submitted to and approved by DTSC if corrective actions associated with the Consent Order require removal of pavements overlying contaminated soils.

MM-HAZ-2: **Pre-Demolition Hazardous Materials Survey and Abatement.** A hazardous materials survey will be conducted on the Project site prior to demolition or other deconstruction activities. Demolition or renovation plans and contract specifications shall incorporate abatement procedures for the removal of materials containing hazardous materials, as defined at the time of the activity. All abatement work shall be done in accordance with federal, state, and local regulations and requirements, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District.

Significance After Mitigation

Phase 1 Continued Operations

New impacts related to off-site deposition of hazardous waste constituents during operation would be reduced to less than significant with mitigation incorporated.

Implementation of **MM-HAZ-1** requires preparation and implementation of a cap maintenance program that would result in ongoing maintenance and inspection of the concrete cap during the continued operations phase (Phase 1). Regular inspections would be conducted by the site operator and inspection report would be submitted to LAHD for review prior to finalization and/or submittal to any regulatory agency. This would reduce or eliminate the potential for degradation of the existing engineered cap and subsequent releases of impacted/contaminated soils. New impacts to the public through routine continued operations would be reduced to a less than significant level with the implementation of this mitigation.

Implementation of Mitigation Measure **MM-HAZ-1** and adherence to federal, state, and local rules and regulations, would also further reduce potential impacts related to groundwater contamination.

Phase 2 Non-operational Restoration Period

Mitigation measure **MM-HAZ-2** would require a survey for and abatement of other hazardous building materials prior to demolition of on-site structures. The survey would evaluate universal wastes, lead-based paints, PCB-containing materials, and other hazardous materials that may be present on the Project site, such as drums, tanks, and totes containing hazardous liquids or residues that would be characterized as hazardous wastes. Once these materials are properly abated and removed, permitted demolition of the buildings in accordance with federal, state, and local rules and regulations would not release hazardous materials to the environment. New potential impacts related to hazardous building materials would be less than significant with implementation of this mitigation.

3.4.6.2 Impact HAZ-2: Would the Proposed Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Findings in the 1996 Final EIR

As discussed above in Section 3.4.6.1, the 1996 Certified EIR analysis determined the potential for an accidental release was categorized as catastrophic, but the risk was categorized as acceptable, and no mitigation was recommended.

Impacts of the Proposed Project

Phase 1 Continued Operations

As discussed in the August 2021 Addendum to the Applicant's Extension Project EIR (Harris & Associates 2021), the air pollution control system (APCS) underwent improvements following an explosion that occurred in 2007. The improved design of the shredder directly addressed the cause of past explosions and preventive measures have been implemented. As such, future risk due to explosion is not anticipated.

As discussed in Section 3.4.6.1, evidence of off-site migration of hazardous waste and hazardous waste constituents was documented in multiple on-site inspections and sampling events conducted by DTSC between February 2017 and January 2022. Corrective actions have been implemented, and continued operations will include further evaluation and correction of off-site impacts under the Consent Order between DTSC and the Applicant (Appendix E-1). With implementation of these legally enforceable corrective actions during the operational phase of the Proposed Project, hazardous waste impacts would be corrected, and no new or substantially more severe impacts would result from the implementation of Phase 1.

Phase 2 Non-operational Restoration Period

As discussed in Section 3.4.6.1, potential releases of hazardous materials could occur due to demolition and restoration activities. New impacts for upset and accident conditions involving releases of hazardous materials during the demolition phase would be potentially significant, and mitigation is required.

Mitigation Measures Applicable to the Proposed Project

Both **MM-HAZ-1** and **MM-HAZ-2** would be required as outlined in Section 3.4.6.1.

Significance After Mitigation

Implementation of **MM-HAZ-1** would result in the development and implementation of an ongoing maintenance and repair program of the asphalt cap during the operational phase, which would prevent degradation and release of contaminated soils. This program would require routine inspections and out maintain the cap's integrity while reducing the potential for contaminated soils to be released to the environment. As such, new impacts to the public or environment due to potential upset or accident conditions would be reduced to a less than significant level with mitigation incorporated.

Implementation of **MM-HAZ-2** would result in proper abatement of hazardous building materials during Phase 2's demolition activities, and would result in removal of said materials prior to demolition of

on-site structures. This would remove the potential for upset or accident conditions, as protective measures would be required and implemented by licensed and certified personnel trained to handle hazardous building materials. With the implementation of this mitigation, and adherence to SCAQMD Rules 1403, 14666, 1166 and 403, new impacts to the public or environment due to potential upset or accident conditions would be reduced to a less than significant level.

3.4.6.3 Impact HAZ-3: Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Findings in the 1996 Final EIR

The 1996 Certified EIR discusses the known soil and groundwater contamination that was present at the time of certification. A risk assessment was prepared and accepted by California Office of Environmental Health Hazard Assessment that determined soil and groundwater posed no unacceptable threat to either on-site workers or persons outside the boundaries of the facility. Remediation options were evaluated for proposed future construction related to site improvements. Risks associated with these options were determined to be acceptable with air pollution controls and implementation of health and safety plans. No mitigation measures were proposed.

Impacts of the Proposed Project without Mitigation

The Project site is listed on the LUST database, which is a hazardous materials site pursuant to Government Code Section 65962.5 (Cortese List Site). The groundwater contamination plume associated with this listing is undergoing remediation and monitoring under LARWQCB File 90-47. As discussed above, remediation is ongoing until cleanup criteria established in the RAP are achieved and/or as deemed complete by the regulatory agency and LAHD. As such, continued operations would reduce impacts associated with the groundwater contamination plume, and no new impacts or substantially more severe impacts than those previously analyzed would occur.

Phase 1 - Continued Operations

As discussed in Sections 3.4.6.1 and 3.4.6.2, operation of the Proposed Project would include remedial activities required under LARWQCB File 90-47, which would ultimately reduce impacts associated with the site's listing on a Cortese List database, as regulatory requirements and remedial activities would further reduce impacts associated with this listing. Completion of remedial activities and closure of the regulatory file is required under state regulation, and as such no new or substantially more severe groundwater impacts associated with the Cortese List site would occur.

Phase 2 - Non-operational Restoration Period

The Phase 2 - Non-operational Restoration Period would further reduce impacts by removing impacted soils and replacement with clean fill. While soil contamination was previously addressed under WDR 96-020, the previous cleanup levels do not meet current regulatory standards, and therefore are no longer protective of human health or the environment. Restoration actions would remove remaining impacted concrete/asphalt and soils, and remaining soils and clean fill would meet present-day regulatory standards and those established by LAHD. The Applicant has also entered into a Consent Order with DTSC, under which remedial activities would also be required following review of the Site Investigation Report (GSI 2023b) and supplemental site investigation report (Appendix E-1). As such, no new or substantially more severe impacts would occur with implementation of the Proposed Project.

Mitigation Measures Applicable to the Proposed Project

No mitigation is required.

3.4.6.4 Summary of Impact Determinations

Table 3.4-1 summarizes the Proposed Project's impacts with respect to hazards. As presented in Table 3.4-1, the Proposed Project's impacts would include both newly significant impacts and no new significant or substantially more severe impacts than previously analyzed.

For each type of potential impact, the table describes the impact, notes the impact determinations, describes any applicable mitigation measures, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

Table 3.4-1
Summary Matrix of Potential Impacts and Mitigation Measures for Hazards Associated with the Proposed Project

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts After Mitigation
Impact HAZ-1: Would the Proposed Project create a significant hazard to the public through the routine transport, use or disposal of hazardous materials?	New significant impacts would occur	**MM-HAZ-1** Maintenance of Existing Cap and **MM-HAZ-2** Pre-Demolition Hazardous Materials Survey and Abatement	Less than significant impacts would occur with the implementation of new mitigation measures.
Impact HAZ-2: Would the Proposed Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	New significant impacts would occur	**MM-HAZ-1** Maintenance of Existing Cap and **MM-HAZ-2** Pre-Demolition Hazardous Materials Survey and Abatement	Less than significant impacts would occur with the implementation with new mitigation measures.
Impact HAZ-3: Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No new or substantially more severe significant impacts would occur	No mitigation is required	No new or substantially more severe significant impacts would occur

3.4.6.5 Mitigation Monitoring

MM-HAZ-1 **Maintenance of the Existing Cap.** The existing cap shall, at all times during the continued operations of the Proposed Project, prior to the deconstruction activities, meet the requirements of A.6 of the WDR, which includes a minimum of 6 inches of concrete pavement over a minimum of 8 inches of base rock or base material. A

maintenance schedule shall be prepared and implemented that addresses ongoing maintenance and repair of the asphalt cap. The schedule shall be reviewed and approved by LAHD. Inspections will be conducted by the site operator; inspection reports will be submitted to LAHD for review prior to finalization and/or submittal to any regulatory agency. Additionally, LAHD shall have authority to conduct regular cap inspections as outlined in the maintenance schedule to verify cap integrity and confirm the maintenance and repair schedule is being appropriately implemented. In addition to LAHD oversight, a workplan must be submitted to and approved by DTSC if corrective actions associated with the Consent Order require removal of pavements overlying contaminated soils.

MM-HAZ-2 **Pre-Demolition Hazardous Materials Survey and Abatement.** A hazardous materials survey will be conducted on the Project site prior to demolition or other deconstruction activities. Demolition or renovation plans and contract specifications shall incorporate abatement procedures for the removal of materials containing hazardous materials, as defined at the time of the activity. All abatement work shall be done in accordance with federal, state, and local regulations and requirements, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District.

3.4.7 SIGNIFICANT UNAVOIDABLE IMPACTS

3.4.7.1 Phase 1 Continued Operations Impacts

The Proposed Project will not result in any new significant and unavoidable impacts or a substantial increase in the severity of impacts previously identified effects.

3.4.7.2 Phase 2 Non-operational Restoration Period Impacts

The Proposed Project will not result in any new significant and unavoidable impacts with mitigation incorporated.

Section 3.5

Hydrology and Water Quality

Section Summary

This section evaluates whether the Proposed Project would cause a new or substantially more severe significant adverse environmental impact related to hydrology and water quality from the impacts that were previously identified and found to be less than significant in Section 3.4 of 1996 Certified Environmental Impact Report (EIR) (SCH No. 93071074). (Pub. Resources Code, Section 21166; California Environmental Quality Act (CEQA) Guidelines, Section 15162.) Specifically, as discussed herein, there are no new reasonably foreseeable significant impacts or substantially more severe impacts related to the Proposed Project from either a substantial change to the Project or the circumstances under which the site would continue to be operated under the Project (see CEQA Guidelines, Section 15162, subds. (a)(1)-(2)), nor has there been new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the prior EIR, discovered to warrant a new significant impact conclusion (see CEQA Guidelines, Section 15162, subdivision (c)).

Section 3.5, Hydrology and Water Quality, provides the following:

- A description of the existing hydrological environmental setting in the Port of Los Angeles (POLA or Port) area
- A description of the existing drainage control measures implemented at the Project site
- A description of applicable program and regulations regarding water quality
- A discussion on the methodology used to determine whether the Proposed Project would adversely change the existing physical conditions (e.g., drainage patterns) or increase potential sources of pollution in runoff
- An impact analysis of the Proposed Project
- A description of any mitigation measures proposed to reduce new significant adverse impacts, if any.

Key Points

The 1996 Certified EIR did not identify any significant impacts, and no mitigation was required related to hydrology and water quality.

Operations under the Proposed Project's Phase 1 - Continued Operation would continue as under existing conditions, which include implementation of a Stormwater Pollution Prevention Plan (SWPPP) and the stormwater drainage control system.

The facility operations are currently regulated by the National Pollution Discharge Elimination System (NPDES) Industrial General Permit, which regulates discharges from the site.

The Phase 2 - Non-operational Restoration Period would include remediation via removal of contaminated soils currently present at the site, which should remove source contaminants that are adversely affecting groundwater quality and be an improvement to existing conditions.

Mitigation measures are not required.

The Proposed Project would not result in any new or substantially more severe significant impacts to hydrology or water quality.

3.5.1 INTRODUCTION

This section evaluates whether the Proposed Project would cause a new or more severe significant adverse environmental impact related to water quality and hydrology from the impacts that were previously identified and found to be less-than-significant in the 1996 Certified EIR based on the proposed changes under which the Project would continue to be operated.

The Initial Study/Notice of Preparation (IS/NOP) that was completed in March 2023, indicated that the Proposed Project has the potential to result in a significant impact related to water quality standards, waste discharge requirements, and the potential presence of emerging chemicals (i.e., per- and poly-fluoroalkyl substances [PFAS]) have the potential to adversely affect water quality of surface or groundwater. The IS/NOP also found that the Proposed Project has the potential to cause significant environmental impacts and may result in a substantially increased public health and safety concerns as a result of the accidental release, spill, or explosion of hazardous materials due to a tsunami or seiche if cleanup of the Proposed Project site is needed in the event of site inundation. This section evaluates the significance of these potential impacts.

3.5.2 ENVIRONMENTAL SETTING/CEQA BASELINE

3.5.2.1 Surface Water

The Proposed Project is located within POLA, which is in San Pedro Bay in the City of Los Angeles, California. The Proposed Project area is in the Dominguez Watershed (State Water Resources Control Board [SWRCB] Hydrologic Unit 405.12), which encompasses an area of 133 square miles of land and water. The watershed is bordered by the City of Inglewood on the north, the City of Torrance on the west, and the federal breakwaters of Los Angeles and Long Beach Harbors (LA/LB Harbors) on the south. Approximately 93% of the land within the watershed is developed, and 62% of stormwater runoff from these lands drains to the Dominquez Channel, which drains into the Los Angeles Harbor. The remaining runoff drains into retention basins.

The Dominguez watershed comprises five subwatersheds: the Upper Channel, Lower Channel, Machado Lake, retention basins, and Harbors sub-watersheds. The Proposed Project occurs within the Harbors sub-watershed, which has an area of 36.7 square miles and covers portions of the cities of Los Angeles, Long Beach, Rancho Palos Verdes, and Rolling Hills. The Harbors sub-watershed drains directly into the LA/LB Harbors.

The Los Angeles Harbor has been physically modified through past dredging and filling projects, as well as by the construction of breakwaters and other structures. Los Angeles Harbor is adjacent to Long Beach Harbor, and they function oceanographically as one unit. This is due to an inland connection via Cerritos Channel and because they share Outer Harbors behind the San Pedro, Middle, and Long Beach breakwaters. In addition, an opening in the causeway leading to Pier 400 was designed to enhance circulation.

3.5.2.2 Water Quality

The waters of LA/LB Harbor are governed by federal, state, and local regulations. Water quality in San Pedro Bay has improved greatly over the last 40 years through compliance with these regulations, better pollution-source control, and dredging that has removed accumulated contaminants in harbor

sediment. However, legacy contaminants flow into the harbor from port land, and upstream sources in the watershed well beyond the ports' boundaries. The *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) specifies beneficial uses that apply to water bodies with the potential to be affected by the Proposed Project, as shown in **Error! Reference source not found.**. A beneficial use is one of the various ways that water can be used for the benefit of people and/or wildlife. The 303(d)-listed impairments for the Los Angeles/Long Beach Inner Harbor, where the Proposed Project is located, are shown in **Error! Reference source not found.** and are based on the 2020/2022 California Integrated Report.

Table 3.5-1. Existing Beneficial Uses for Surface Waters of Water Bodies with Potential to Be Affected by the Project

Water Body	Designated Beneficial Uses
Los Angeles: Long Beach Harbor (Inner Areas)	IND; NAV; COMM; MAR; RARE a; SHELL; REC-1 b; REC-2

Source: Los Angeles RWQCB 2014.

[a] One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.

[b] Potential beneficial use.

COMM= Commercial and Sport Fishing; IND= Industrial Service Supply; MAR = Marine Habitat; NAV = Navigation; RARE=Rare; Threatened or Endangered Species; REC-1=Water Contact Recreation; REC-2=Non-contact Water Recreation; RWQCB = Regional Water Quality Control Board; SHELL = Shellfish Harvesting.

Table 3.5-2. Water Quality Impairments within the Project Area: Los Angeles/Long Beach Inner Harbor

Listed 303(d) Impairments	Potential Sources	EPA TMDL Report Completion
Copper	Source Unknown	March 23, 2012
DDT	Source Unknown	March 23, 2012
PCBs	Source Unknown	March 23, 2012
Toxicity	Source Unknown	March 23, 2012
Zinc	Source Unknown	March 23, 2012
Benthic Community Effects	Source Unknown	March 23, 2012
Benzo(a)pyrene	Source Unknown	March 23, 2012
Chrysene	Source Unknown	March 23, 2012

Source: SWRCB 2022.

DDT = Dichlorodiphenyltrichloroethane; EPA=U.S. Environmental Protection Agency; PCBs = Polychlorinated biphenyls; TMDL=total maximum daily load.

In accordance with Section 303 (d)(1)(C), states are required to develop a TMDL for pollutants not meeting the effluent limitations and at a level necessary to implement the established water quality standards. A TMDL represents the maximum amount of a pollutant a waterbody can receive and still meet water quality standards. The *Total Maximum Daily Load for Toxic Pollutants in Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters* (Harbor Toxics TMDL) became effective on March 23, 2012. The Harbor Toxics TMDL was promulgated to protect and restore fish tissue, water, and sediment quality in Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters (including Consolidated Slip and Greater Harbor Waters).

Compliance with the Harbor Toxics TMDL includes assessment of water quality chemistry concentrations performed twice every 5 years by the Regional Monitoring Coalition. Most recent water quality monitoring was conducted during three separate events: one dry event conducted in summer

of 2021 and two wet weather events: October 2021 and December 2021, respectively (Anchor 2022). Analytical results were compared to CTR Criteria for the Protection of Aquatic Life – Saltwater Chronic (CTR criteria [aquatic life]) and CTR Criteria for the Protection of Human Health – Consumption of Organisms Only (CTR criteria [human health]). In general, analytical results showed concentrations at nondetectable levels or below applicable water quality criteria, with the exception of dissolved copper, total PCBs, and total DDT at one or more stations in one or more sampling events (a detailed review of these exceedances are presented in the following sections).

General water quality physical parameters are characterized during the Biological Surveys of the Los Angeles and Long Beach Harbors and have been summarized in the latest 2018 surveys. Parameters described below included water temperature, dissolved oxygen (DO) concentration, water clarity and turbidity, pH, salinity, and chlorophyll-a concentration (as a measure of planktonic algae).

Water temperatures varied by season and depth, with summer surface temperatures reaching 21.9° C. Surface temperatures did not show large differences between Inner Harbor and Outer Harbor, although bottom temperatures in spring and summer were lower at Outer Harbor Stations compared to Inner Harbor and Shallow Water Habitat stations. The past three Biosurveys (2000, 2008, and 2013) occurred during cool oceanic regimes, according to the Oceanic Niño Index and sea-surface temperature records for the last 20 years in San Pedro Bay. Conversely, the 2018 Biosurvey occurred during a warm regime, in addition to following a large marine heatwave event that persisted in the Southern California Bight from 2014-2016. The signal from the marine heatwave within the Port Complex was also recorded in monthly monitoring from 2008-2018 within POLA at Inner and Outer Harbor stations at the surface and the bottom.

DO concentrations were above the Basin Plan water quality objective of 5.0 milligrams per liter (mg/L) at every station in all three seasons with two exceptions: the concentration at the bottom of the water column at the Fish Harbor station was 3.6 mg/L in spring and summer. Fish Harbor has a history of low DO concentrations at depth, which have been attributed to restricted circulation and the presence of historical fish processing wastes in the sediments.

Water clarity at Outer Harbor stations showed little variation with either season or depth, but at some Inner Harbor stations clarity fell to as low as 20% light transmittance, as opposed to typical values elsewhere in the Port Complex of 60%–80%. According to monthly monitoring surveys within POLA from 2009–2018, Inner and Outer Harbor stations showed modest improvement in average water clarity (measured as transmittance and turbidity) in 2015–2018 compared to 2010–2014.

PH values in the Port Complex varied little with season, depth, or location, and were consistent with typical coastal ocean waters. The average pH values harbor wide across all seasons ranged from 8.09–8.47.

Salinity in the Port Complex varied little in spring and summer with depth or location, and values were typical of the nearshore coastal ocean (33.5 practical salinity unit (PSU)). In winter, however, lower salinity occurred in the surface layers at numerous stations as a result of stormwater runoff from the Los Angeles Basin, with salinity ranging from 30.9-33.4 PSU.

Chlorophyll concentrations were similar in summer and winter throughout the Port Complex (1.2-2.1 micrograms per liter (µg/L)), but values were higher in spring (average of 3.7 µg/L) at the surface and 4.4 µg/L near the bottom), reflecting the typical “spring bloom” of planktonic algae. As would be expected in a coastal embayment such as San Pedro Bay, concentrations were generally somewhat higher than in nearby open coastal waters, which average 1-2 µg/L.

3.5.2.3 Project Site Hydrology

The Project site is almost entirely paved and impervious with the only exceptions being the relatively small, landscaped areas by the office building. The concrete and asphalt pavement is considered a cap, regulated by the Los Angeles Regional Water Quality Control Board (LARWQCB) to address the underlying contaminants of concern in the soil and groundwater (discussed in more detail below). As part of the regulatory oversight by the LARWQCB, the Project site undergoes inspections on a regular basis and any signs of degradation or cracks to the existing cap are repaired, as needed. There is an existing stormwater collection system on site that is designed to capture all stormwater and dust control water from the yard operations for reuse on site in accordance with the SWRCB General Permit to Discharge Storm Water Associated with Industrial Activity (General Permit No. CAS000001), adopted by the LARWQCB on April 1st, 2014, Order No. 2014-0057-DWQ as amended in 2015 and 2018.

Stormwater collected on site is directed to underground detention basins throughout the site, with a total capacity of approximately 90,000 gallons. There are also 10 aboveground storage tanks on site, each with a capacity of 42,000 gallons. The drainage system employs a multi-stage chemical treatment process to provide water treatment prior to any off-site discharges. This process 1) effectively reduces the concentrations of contaminants of concern, 2) does not rely on significant changes in pH or other basic parameters, and 3) is consistent with the Best Available Technology (BAT) Economically Achievable and Best Conventional Pollutant Control Technology (BACT) mandate established in the existing NPDES Industrial General Permit that has been issued for the site. All stormwater exposed to industrial activity (i.e., receiving, shredding, depollution, dismantling, welding, torch-cutting, materials storage and recovery) is captured and reused, or treated prior to off-site discharge. In rare instances, when stormwater cannot be contained for use on site, it is chemically treated and discharged to either of two storm drains, one near the site entrance and one on adjacent Los Angeles Harbor District (LAHD) property. Both drains connect to the Cerritos Channel.

3.5.2.4 Groundwater

The Proposed Project site is within the Coastal Plain of Los Angeles – West Coast groundwater basin, which covers an area of approximately 91,300 acres. The basin is bound on the north by the Ballona Escarpment, to the east by the Newport-Inglewood fault zone, and on the south and west by the Pacific Ocean and consolidated rocks of the Palos Verdes Hills. The Department of Water Resources (DWR) considers the West Coast Basin a very low priority basin pursuant to the Sustainable Groundwater Management Act, due to its adjudication (DWR 2023). In the West Coast subbasin, the most critical issue is high concentrations of total dissolved solids (TDS), an indicator of salt content, along the Pacific Ocean coast due to seawater intrusion. Recharge occurs primarily by injection of imported water and reclaimed water into wells of the seawater intrusion barrier and by underflow from the Central Basin. Groundwater flow directions are controlled by the engineered recharge and by groundwater pumping from the numerous wells distributed across the region (Fram and Belitz 2012).

Groundwater beneath the Project site would have high TDS concentration levels due to its location and is not a viable source of water supply. In addition, as also discussed in Section 3.4, Hazards, multiple groundwater monitoring wells have been constructed on the site related to an investigation regarding a petroleum hydrocarbon release at the site that occurred in 1988. There are 15 groundwater monitoring wells still present on the site; 5 are actively used for groundwater monitoring associated with the leaking underground storage tank case, and 11 wells are used for semi-annual gauging of groundwater levels. Groundwater at the site is between 6 and 11 feet below ground surface and adversely affected by the past release of diesel fuel, which occurs as free phase petroleum product (floating on top of the groundwater table). Groundwater sampling has been conducted at the site semiannually beginning in 2012 and are ongoing. As of June 2023, free product recovery is still being

conducted, but the amount recovered has been decreasing over time. Recovery utilizes passive skimmers installed in 4 on-site wells, absorbent socks in 1 well, and by manual bailing in another well as part of the cleanup being administered through the 1997 Remediation Action Plan (Clayton Environmental 1997). Monitoring data indicated that diesel and VOC concentrations were generally decreasing over time.

3.5.2.5 Flooding

The Federal Emergency Management Agency (FEMA) has determined that the Project site is not located within a flood hazard zone, which is defined as having an 1% annual chance of flooding (also known as the 100-year flood zone) (FEMA 2023).

3.5.2.6 Tsunamis and Seiche Waves

A seismic sea wave or tsunami is produced by a large displacement of the ocean bottom and can move at velocities of up to 500 miles per hour in deep ocean water. In the deep ocean, tsunamis can be only a few feet high. As the tsunami reaches shallower coastal waters, it travels much slower and wave energy is compressed, which can lead to a rapid and dramatic increase in wave height. Generally, a tsunami is not a single wave but a series of waves, and the first wave may not be the largest. Tsunami waves are often destructive, leading to property damage and sometimes loss of life. In some cases, the coastal waters are drawn out into the ocean just before the tsunami strikes. When this occurs, more shoreline may be exposed than even at the lowest tide.

Typically, hazardous tsunamis along the California coastline are associated with seismic events and are caused by vertical displacement of submarine faults. They can also occur as a result of submarine landslides that may or may not occur in conjunction with seismic activity. According to mapping compiled by the California Geological Survey, the entire Port including the Proposed Project site is considered to be within a tsunami hazard zone that could be subject to inundation (CGS 2023).

3.5.2.7 Sea Level Rise

Scientific evidence indicates the potential for sea level rise (SLR) due to the rapidly accelerating and irreversible ice loss that could result in upwards of 6–10 feet of SLR sometime into the future (CCC 2021 and OPC 2018). A Sea Level Rise Adaptation Study was conducted by the Port of Los Angeles in 2018 to assess the potential impacts of rising sea levels on the Port's infrastructure and operations. The study assessed the Port's vulnerability to SLR, examined potential impacts of several SLR scenarios on critical port infrastructure, and identified adaptation strategies to manage the risks. The study assessed several SLR scenarios that represent a range of scenarios for planning and adaptation purposes. These scenarios included an SLR of 12 inches by the year 2030, 24 inches by the year 2050, and 37 inches by the year 2100. Additionally, each SLR scenario was assessed under two tide conditions: daily tidal levels and the 100-year storm tide, representing permanent inundation and temporary flooding, respectively. Since the Proposed Project is proposing a 10-year lease extension followed by an up to 5-year non-operational restoration period, the 12 inches in year 2030 would be the most relevant scenario for the Proposed Project.

Figure E-4 of the study shows that the Proposed Project site would remain free of inundation and flooding if the sea level rises by 12 inches in the year 2030 and by 24 inches in the year 2050.

3.5.3 REGULATORY SETTING

3.5.3.1 Federal Regulations

Clean Water Act

Increasing public awareness and concern for controlling water pollution led to the enactment of the Federal Water Pollution Control Act Amendments of 1972. As amended in 1977, this law became commonly known as the Clean Water Act (CWA) (33 USC 1251 et seq.). The objective of the CWA is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. The CWA established basic guidelines for regulating discharges of pollutants into the waters of the United States. The CWA requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA. The CWA establishes several major integrated regulatory programs, standards, and plans, which include the following:

- National Pollutant Discharge Program
- National and Local Pretreatment Standards (Section 307)
- Dredge or Fill Discharge Permit Program (Section 404)
- Sewage Sludge Use and Disposal Program (Section 405)
- Water Quality Management (Sections 106, 205(j), non-construction management 205(g), 208, 303 and 305)

Section 401 of the Clean Water Act (Water Quality Certification)

Section 401 of the CWA requires that an applicant for any federal permit (e.g., a U.S. Army Corps of Engineers Section 404 permit) obtain certification from the state, requiring that discharge to waters of the United States would comply with provisions of the CWA and with state water quality standards. For example, an applicant for a permit under Section 404 of the CWA must also obtain water quality certification per Section 401 of the CWA. Section 404 of the CWA requires a permit from the U.S. Army Corps of Engineers prior to discharging dredged or fill material into waters of the United States unless such a discharge is exempt from CWA Section 404. For the Project area, the LARWQCB must provide the water quality certification required under Section 401 of the CWA.

Section 402 of the Clean Water Act (NPDES)

The CWA was amended in 1972 to provide that the discharge of pollutants to waters of the United States from any point source is unlawful unless the discharge is in compliance with an NPDES permit. The NPDES permit program, as authorized by Section 402 of the CWA, was established to control water pollution by regulating point sources that discharge pollutants into waters of the United States (33 USC 1342). In California, the Environmental Protection Agency (EPA) has authorized the SWRCB permitting authority to implement the NPDES program.

In accordance with the CWA, the EPA issued its 2022 Construction General Permit for stormwater discharges during construction activities on January 18, 2022.

Section 404 of the CWA

Section 404 of the CWA established a permitting program to regulate the discharge of dredged or fill material into waters of the United States, which include wetlands adjacent to national waters (33 USC 1344). This permitting program is administered by the U.S. Army Corps of Engineers and enforced by the EPA.

3.5.3.2 State Regulations

California Porter-Cologne Water Quality Control Act

Since 1973, the California SWRCB and its nine RWQCBs have been delegated the responsibility for administering permitted discharge into the waters of California. The Project site falls within the jurisdiction of the LARWCQB. The Porter-Cologne Water Quality Act (California Water Code Section 13000 et seq.; California Code of Regulations, Title 23, Division 3, Chapter 15) provides a comprehensive water-quality management system for the protection of California waters. Under the Act, "any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state" must file a report of the discharge with the appropriate RWQCB. Pursuant to the Act, the RWQCB may then prescribe "waste discharge requirements" that add conditions related to control of the discharge. Porter-Cologne defines "waste" broadly, and the term has been applied to a diverse array of materials, including non-point source pollution. When regulating discharges that are included in the Federal Clean Water Act, the state essentially treats Waste Discharge Requirements and NPDES as a single permitting vehicle. In April 1991, the SWRCB and other state environmental agencies were incorporated into the California EPA.

The RWQCB regulates urban runoff discharges under the NPDES permit regulations. NPDES permitting requirements cover runoff discharged from point (e.g., industrial outfall discharges) and non-point (e.g., stormwater runoff) sources. The RWQCB implements the NPDES program by issuing construction and industrial discharge permits.

Under the NPDES permit regulations, BMPs are required as part of a SWPPP. The EPA defines BMPs as "schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of Waters of the United States." BMPs include treatment requirements, operating procedures, and practices to control site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage" (40 CFR 122.2).

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High-Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the state (e.g., isolated wetlands and groundwater), not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained, and discharges to that water body shall not unreasonably affect present or anticipated beneficial use of such water resource.

California Toxics Rule

The EPA has established water quality criteria for certain toxic substances via the California Toxics Rule. The California Toxics Rule established acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by each RWQCB as having beneficial uses protective of aquatic life or human health.

California NPDES Construction General Permit

In order to comply with the CWA and its mandate to control pollutants in stormwater, the SWRCB issued the Statewide Construction General Permit for Stormwater Discharges. The Construction General Permit was adopted September 8, 2022, and became effective September 1, 2023. This permit covers construction projects that include construction or land disturbance activities that result in a

disturbance of 1 or more acres, or less than 1 acre but are part of a larger common plan of development or sale that totals 1 or more acres of land disturbance.

Under the General Construction Permit, a SWPPP must be developed that describes BMPs the discharger would use to protect stormwater runoff. The BMPs must be designed to prevent, to the maximum extent practicable, an increase in the sediment yield and flow velocity from pre-construction/pre-development conditions, to assure that applicable water quality standards, including TMDL waste allocations, are met.

California NPDES Industrial Stormwater Program

The Statewide General Permit for Stormwater Discharges Associated with Industrial Activities (Industrial General Permit) implements the federally required stormwater regulations in California for stormwater associated with industrial activities discharging to waters of the United States. The Industrial General Permit regulates discharges associated with 9 federally defined categories of industrial activities. The Project site is under the jurisdiction of the LARWQCB. Stormwater discharges from the site are currently permitted under the SWRCB General Permit to Discharge Storm Water Associated with Industrial Activity (General Permit No. CAS000001), adopted by the LARWQCB on April 1st, 2014, Order No. 2014-0057-DWQ as amended in 2015 and 2018.

3.5.3.3 Local Regulations

Los Angeles Regional MS4 Permit

The LARWQCB regulates discharges from municipal separate storm sewer systems (MS4s) through the Los Angeles and Ventura counties' MS4 Permit (Order No. R4-2021-0105). These permits are issued under the NPDES Program and covers the City of Los Angeles and 84 other municipalities within Los Angeles County. The City of Los Angeles Department of Public Works plays a large role in the administration of the MS4 permit structure that covers the Port and its tenants' Public Agency Activity Program components. The City of Los Angeles is ultimately responsible for administering administration and reporting requirements in the MS4 permit citywide, including the Harbor District, with the Port providing additional oversight and assistance at the harbor.

The Port leases property to a variety of industrial and commercial tenants. Tenants are required to comply with the appropriate NPDES permit requirements for their facility. Tenants file and report directly with the Los Angeles to the State Water Resources Control Board RWQCB for the NPDES General Industrial Stormwater Permit or to the LARWQCB for individual NPDES permits. The Port maintains an outreach and coordination effort with its tenants including providing stormwater outreach materials for tenants, conducting site evaluations for select tenants to assist them in understanding their NPDES permit compliance General Industrial Stormwater Permit responsibilities requirements and identifying activities that require BMPs to prevent stormwater pollution.

Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties

Discharges of treated or untreated groundwater generated from permanent or temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits are currently regulated under a regional general permit, General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004).

Construction dewatering wastes (except stormwater) are regulated as low-threat discharges to surface waters. A Notice of Intent (NOI) and report of waste discharge must be submitted to the LARWQCB to comply with this general permit. Based on the depth to groundwater, it is not anticipated that the Proposed Project would require groundwater dewatering during Phase 2 restoration activities or be subject to the requirements of this general permit. In the event that groundwater is encountered during site restoration, it would be covered under the NPDES Construction Stormwater General Permit Order 2022-0057-DWQ Construction.

City of Los Angeles Planning and Zoning Code

The City of Los Angeles Municipal Code contains provisions for water quality-related requirements applicable to the Proposed Project as listed below.

- Section 64.70: Stormwater and Urban Runoff Pollution Control: This article sets forth uniform requirements and prohibitions for discharges and places of discharge into the storm drain system and receiving waters necessary to adequately enforce and administer all federal and state laws, legal standards, and orders that provide for the protection, enhancement, and restoration of water quality.
- Section 64.72: Stormwater Pollution Control Measures for Development Planning and Construction Activities: This section contains requirements for construction activities and facility operations of development and redevelopment projects to comply with the land development requirements of the MS4 permit though integrating low impact development (LID) practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all developments and redevelopments consistent with the City of Los Angeles's landscape ordinance and other related requirements in the Development Best Management Practices Handbook.

In addition, Division 70, Grading, Excavation, and Fills, includes provisions for erosion control and grading permits.

City of Los Angeles Low Impact Development Ordinance

In 1998 the City of Los Angeles passed a stormwater ordinance (Los Angeles Municipal Code 64.70), which prohibits the entry of illicit discharges into the municipal storm drain system. In 2011 the City of Los Angeles adopted a LID Ordinance, updated in 2015, which amends Los Angeles Municipal Code 64.70 and requires runoff to be captured, infiltrated and/or used on site at most developments and redevelopments.

3.5.4 METHODOLOGY

Phase 1 - Continued Operation

The potential for new significant impacts caused by the Proposed Project related to hydrology and water quality during the Phase 1 - Continuing Operation activities was assessed based on existing conditions, Project characteristics (e.g., a continuation of existing ongoing operations), and existing regulatory requirements. Existing conditions are in part based on the findings presented in the Hazardous Materials Technical Report (on file with LAHD (Dudek 2023)), which is also summarized and discussed in Section 3.4, Hazards, of this document. Project characteristics consider that the Proposed Project would continue operations that are already occurring at the site as identified in the Project Description and no physical improvements or material changes to existing operations would occur over the next ten years. Impacts would be considered significant if any of the significance criteria listed below occur in association with continued operation of the Proposed Project.

Phase 2 - Non-operational Restoration

Potential impacts associated with the Phase 2 - Non-operational Restoration activities of the Project assume that following demolition of on-site structures, the site would be remediated through excavation and off-site disposal of contaminated soils consistent with oversight by the LARWQCB and/or the Department of Toxic Substances Control (DTSC).

CEQA Baseline

As noted above, the CEQA Baseline for the Proposed Project as it relates to Hydrology and Water Quality assumes that the existing drainage system would operate consistent with current operations. In addition, the analysis assumes continued compliance with the existing NPDES Industrial General Permit and any corrective actions required by RWQCB or DTSC.

3.5.5 THRESHOLDS OF SIGNIFICANCE

The following criteria are based on the Los Angeles CEQA Thresholds Guide (City of Los Angeles 2006) and the CEQA Appendix G checklist and are the basis for determining the significance of impacts associated with Hydrology and Water Quality resulting from implementation of the Proposed Project.

The IS/NOP (Appendix A) provided an analysis of the Proposed Project compared to the Approved Project that was analyzed in the 1996 Certified EIR and identified less than significant impacts related to groundwater supplies or recharge, alteration of drainage patterns, erosion or siltation, impacts related to flood flows and conflicts with the implementation of a water quality control plan or sustainable groundwater management plan. The IS/NOP also identified no impacts related to surface runoff that would result in flooding or would exceed planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, these are not discussed in the subsequent sections.

The only thresholds that were identified as potentially significant and required further analysis in the IS/NOP were as follows:

> **HYD–1:** Would the Proposed Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?
>
> **HYD–2:** Would the Proposed Project risk release of pollutants due to inundation from a flood hazard, tsunami, or seiche zone?

These thresholds apply to both the Phase 1 - Continued Operations and the Phase 2 - Non-operational Restoration Phases of the Proposed Project.

3.5.6 IMPACT DETERMINATION

3.5.6.1 Impact HYD-1: Would the Proposed Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Findings in the 1996 Certified EIR

The findings of the 1996 Certified EIR concluded that remediation and construction activities would not significantly alter runoff rates, implementation of the SWPPP would minimize construction impacts and the dredging on Berths 210-211 would remove some pollutants while the increased turbidity

would only be temporary and limited in extent. In addition, the soil remediation and placement of an asphalt/concrete cap would prevent contamination of surface runoff while the operational SWPPP would include pollution prevention BMPs to treat stormwater runoff prior to discharge. No significant impacts were identified, and no mitigation was required.

Impacts of the Proposed Project

Phase 1: Continued Operations

Operationally, the Proposed Project would continue during Phase 1 as a scrap metal recycling facility with no material changes to the existing ongoing operations, routine maintenance, or replacement of existing equipment that may be necessary during the term of the proposed extension. The existing and ongoing groundwater monitoring and free product recovery of the 1988 diesel fuel release would continue as under existing conditions, with no changes proposed, which should provide gradual improvement in groundwater quality. The existing stormwater control system would continue to operate in accordance with the current SWPPP that is consistent with the NPDES Industrial General Permit and provide water quality treatment prior to any off-site discharge.

Since certification of the 1996 Certified EIR, there has been an increased focus on what are known as emerging contaminants such as PFAS, which are being considered by the EPA for listing as hazardous substances under the Comprehensive Response, Compensation, and Liability Act (CERCLA). PFAS is a family of more than 3,000 man-made and mostly unregulated chemicals that have been produced since the mid-1900s (SWRCB 2019). They are mobile, persistent, and bioaccumulative. They are resistant to degradation in the environment and when degradation occurs, it often results in the formation of other PFAS compounds. PFAS are extremely persistent in the environment and highly mobile in water. People can be exposed to PFAS through food, food packaging, consumer products, house dust, and drinking water. Since these chemicals have been used in an array of consumer products, scientists have found Perfluorooctanoic Acid and Perfluoro-1-octanesulfonic acid in the blood of nearly all people tested. Exposure through drinking water has become an increasing concern due to the tendency of PFAS to accumulate in groundwater. The EPA has recently proposed Maximum Contaminant Levels for six specific PFAS compounds under the Safe Drinking Water Act; however, groundwater beneath the Project site is not a source of drinking water.

PFAS are used in the aerospace, automotive, chemical, electronics, metal coatings and plating, and textiles industries due to their friction-reducing characteristics. Potential firefighting sources of PFAS include airports and aviation facilities, military bases and training centers, petroleum refineries and terminals, and petrochemical production facilities. Non-industrial PFAS sources include waste disposal facilities, wastewater treatment plant operations, and biosolids application to agriculture. Secondary sources of PFAS include waste streams such as landfills and wastewater treatment plants.

PFAS compounds are not stored or used directly as part of operations at the Project site but could potentially be included as part of the throughput received and processed at the site. However, considering that site operations would continue as under existing conditions, there would be no substantive increase in the volume of PFAS compounds that are present at the Project site, and little is known regarding transport or exposure risks of PFAS compounds as it relates to metal recycling. In addition, the facility would be required to adhere to any applicable regulatory changes that may become applicable to site operations as agencies such as the EPA and RWQCB implement their roadmap to regulation of PFAS. The EPA has issued a memo to proactively use its CWA permitting authorities to reduce discharges of PFAS at the source and to obtain more comprehensive monitoring information on potential sources of PFAS (EPA 2023). This strategy is meant to minimize PFAS pollution in surface water as EPA works to set effluent guidelines, develop analytical methods, and issue water quality criteria for PFAS. This memo applies to CWA programs that EPA oversees; EPA plans to issue a

subsequent memo that provides guidance to NPDES permitting authorities on monitoring provisions and analytical methods as well as the use of pollution prevention and BMPs.

Therefore, since the throughput characteristics connected with the Proposed Project's Phase 1 - Continued Operations would not substantively change with the Proposed Project, and the continued compliance with regulatory requirements including the NPDES Industrial General Permit as well as any forthcoming regulatory changes, there would be no new significant impacts or more severe impacts beyond those previously studied in the 1996 Certified EIR related to water quality.

Phase 2: Non-operational Restoration

In Phase 2 - Non-operational Restoration, the existing above ground improvements would be demolished and transported off site for recycling or disposal in accordance with a demolition permit issued by the City of Los Angeles and any applicable LAHD requirements. The drainage system would operate throughout demolition activities in accordance with the existing NPDES Industrial General Permit. Demolition of the utilities including the drainage system would follow the removal of demolition debris. Once the demolition debris is removed, 11,000 cubic yards of soil would be excavated from the site in coordination with the LARWQCB as part of the remediation of the site. Excavation and handling of the excavated materials would be done in accordance with regulatory oversight from the LARWQCB that would ensure that measures such as isolation and covering of excavated materials to prevent contact with stormwater runoff would occur. Any applicable requirements related to enforcement measures of the Harbor Toxics TMDL would also apply to the restoration activities at the site to ensure that control of contaminants is incorporated into earthwork activities to protect water and sediment quality of the harbor. The excavated soils would be replaced with certified clean imported fill materials. Ultimately, the restoration of the site would remove existing subsurface contaminants and reduce the source of contamination that is currently adversely affecting groundwater quality. With adherence to LARWQCB oversight requirements, which could include replacement of the existing cap, maintenance requirements, ongoing removal of free phase petroleum, and monitoring activities, the remediation activities would be conducted in a manner that is protective of water quality. Therefore, the Phase 2 - Non-operational Restoration activities of the Proposed Project would be conducted in accordance with regulatory oversight with required measures (e.g., covering stockpiles soils and avoidance of rainy season) that are protective of water quality and ultimately would remove source materials that can adversely affect water quality. As a result, no new significant impacts or substantially more severe potential impacts related to water quality related to decommissioning and restoration activities would occur.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project would not result in any new significant impacts or in a substantial increase in impacts beyond what was previously identified under Impact HYD-2.

3.5.6.2 Impact HYD-2: Would the Proposed Project risk release of pollutants due to inundation as a result of a flood, tsunami, or seiche hazard?

Findings in the 1996 Certified EIR

The 1996 Certified EIR determined that the 1996 project would not alter the 100-year flood water flow and no adverse impacts related to hydrology parameters would result from implementation of the project. The 1996 Certified EIR did note that the site would be susceptible to tsunami hazards. In addition, the improvements to the stormwater control system would improve onsite drainage and some of the temporary flooding that had occurred at the site during storm events. No significant impacts were identified, and no mitigation was required.

Impacts of the Proposed Project without Mitigation

Phase 1 - Continued Operations

The Proposed Project is located on Terminal Island within POLA. The topography of the site and surrounding area is flat.

As noted above, the Project site is not currently located within a 100-year flood zone. Even so, in the event the site were subject to flooding, there would be no substantive changes to operations under or potential sources of pollutants onsite as a result of implementation of the Proposed Project.

The Project site is located within the tsunami hazard zone and will be subject to future effects of SLR. Los Angeles County has been affected by 9 notable tsunami events dating back to 1927, with the most recent being in 2015, although no damage was reported during that event. The frequency of tsunamis is related to the frequency of the events that cause them, which can be from a seismic event, volcanic activities, or oceanic landslides. Generally, four or five tsunamis occur every year in the Pacific Basin, and those that are most damaging are generated in the Pacific waters off South America rather than in the northern Pacific. A Port Complex (Port of Los Angeles and Port of Long Beach) model that assessed tsunami and seiche scenarios determined that in each case modeled, impacts from a tsunami were equal to or more severe than those from a seiche (Moffatt and Nichol 2007). As a result, the discussion below refers to tsunamis as the worst case of potential impacts.

Phase 1 Continued Operations would not increase the potential for tsunami damage to occur. Under the Proposed Project, the existing operation would continue for 10 years, and no new structures would be constructed that would be subject to damage, including inundation by tsunami.

The Port Complex model also indicates that a reasonable maximum source for future tsunami events within the harbor area would either be a magnitude (M) 7 earthquake on the Santa Catalina Fault or a submarine landslide along the nearby Palos Verdes Peninsula. The tsunami study notes that large offshore earthquakes (M-7.5) in the Port region are very infrequent (Moffatt and Nichol 2007). Based on the seismicity, geodetics, and geology, a large locally generated tsunami from either local seismic activity or a local submarine landslide (a landslide that would transport sediment across the continental shelf and into the deep ocean) would likely not occur more than once every 10,000 years (Moffatt and Nichol 2007). Thus, the probability of a tsunami event large enough to cause inundation of the Project site is highly unlikely given the relatively short-term nature of the Proposed Project's Phase 1, which is limited to the 10 years, the potential for a tsunami to occur during that time frame would be extremely low. In addition, the contaminant sources that would exist at the Project site would be no different than what is already subject to inundation under existing conditions.

As discussed in Section 3.5.2.7 above, the Sea Level Rise Adaptation Study conducted by the Port of Los Angeles in 2018 found the Proposed Project site would remain free of inundation and flooding if the sea level rises by 12 inches by the year 2030 and by 24 inches in the year 2050 as predicted. Therefore, considering that the terms of the Proposed Project are for extending the existing operation of the facility up to 10 years from 2024 to 2034, and the site would remove all contaminant sources during the Phase 2 - Non-operational Restoration Period of the Project (to 2039), the likelihood of inundation of the site due to SLR over the following approximate 10 years of continued operations and 5 years of restoration seems remote. Thus, the potential risk of release of pollutants due to inundation due to SLR would be less than significant.

Considering the relatively short duration of the Phase 1 - Continued Operations and the low probability of a tsunami event large enough to inundate the site, no new or substantially more severe potential significant impacts related to the release of pollutants from inundation would occur.

Seiches are oscillations generated in enclosed bodies of water usually as a result of earthquake related ground shaking. A seiche wave has the potential to overflow the sides of a containing basin to inundate adjacent or downstream areas. However, the Pacific Ocean and San Pedro Bay are not of the nature that would result in a seiche. As a result, no new or substantially more severe potential impacts related to the release of pollutants from inundation from seiche waves would occur.

Phase 2: Non-operational Restoration

The Non-operational Restoration phase of the Proposed Project would also be relatively short (up to 5 years) and would involve the demolition of all structures on site, the excavation of all hazardous soils and the replacement of those soils with certified clean imported soils. As discussed above, the probability of a tsunami event large enough to cause inundation of the Project site during Phase 2 of the Proposed Project is highly unlikely given the relatively short-term nature of the restoration, which is limited to 5 years. The potential for a tsunami to occur during that time frame would be extremely low. In addition, all activities that would be conducted during Phase 2 would be in accordance with regulatory oversight from LARWQCB, which would ultimately ensure that no threat to human health or the environment remains at the site. Required remediation would consider pathways of exposure and human health risks such that all potential sources of contamination at the site would be managed in a manner that would minimize potential contact with tsunami floodwaters or stormwater flows were they to occur. Considering the relatively short duration of the Phase 2 - Non-operational Restoration and the low probability of a tsunami event large enough to inundate the site, no new or substantially more severe significant impacts related to the release of pollutants from inundation would occur.

Mitigation Measures Applicable to the Proposed Project

No mitigation measures are needed.

Significance After Mitigation

The Proposed Project would not result in any new significant impacts or in a substantial increase in impacts beyond what was previously identified under Impact HYD-2.

3.5.6.3 Summary of Impact Determinations

Table 3.5-1 summarizes the Proposed Project's impacts with respect to safety and risk of upset. As presented in Table 3.5-1, the Proposed Project's implementation would not produce any new significant impacts or substantially increase the severity of an impact that was previously analyzed.

For each type of potential impact, the table describes the impact, notes the impact determinations, describes any applicable mitigation measures, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

Table 3.5-1. Summary Matrix of Potential Impacts and Mitigation Measures for Hazards Associated with the Proposed Project

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts After Mitigation
Impact HAZ-1: Would the Proposed Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	No new or substantially more severe significant impacts would occur	No mitigation is required	No new or substantially more severe significant impacts would occur
Impact HAZ-2: Would the Proposed Project risk release of pollutants due to inundation as a result of a flood, tsunami, or seiche hazard?	No new or substantially more severe significant impacts would occur	No mitigation is required	No new or substantially more severe significant impacts would occur

3.5.6.4 Mitigation Monitoring

The Proposed Project is not expected to substantially increase the frequency or severity of adverse effects related to hydrology or water quality or result in a new significant impact. Therefore, no mitigation is required.

3.5.7 SIGNIFICANT UNAVOIDABLE IMPACTS

Implementation of the Proposed Project is not expected to substantially increase the frequency or severity of adverse effects related to hydrology or water quality; accordingly, no new significant and unavoidable impacts would occur.

Chapter 4

Cumulative Analysis

Chapter Summary

This chapter evaluates the potential for the Proposed Project, together with other past, present, and reasonably foreseeable future projects in the geographic scope of each resource area, to make a cumulatively considerable contribution to a new or substantially more severe significant cumulative impact. Note that no alternatives are evaluated in this Draft Subsequent Environmental Impact Report (SEIR). Chapter 4, Cumulative Analysis, provides the following:

- A description of existing environmental setting in the Port area;
- A description of applicable local, state, and federal regulations and policies that apply to the cumulative impact analysis;
- A description of the past, present, and foreseeable future projects in the surrounding area;
- A discussion of the methodology used to determine whether the Proposed Project would make a cumulatively considerable contribution to a significant cumulative impact;
- An impact analysis of both the cumulative impacts related to the Proposed Project; and
- A description of any mitigation measures proposed to reduce any potential impacts and residual cumulative impacts, as applicable.

Key Points

The Proposed Project would not make a cumulatively considerable contribution to a cumulative impact when combined with other past, present, and reasonably foreseeable future projects in the following resource areas:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality

4.1 Introduction

This chapter presents the California Environmental Quality Act's (CEQA) requirements for a cumulative impact analysis and analyzes the potential for the Proposed Project to make a considerable contribution to a cumulative impact when combined with other past, present, and reasonably foreseeable future projects, compared to the cumulative impacts disclosed in the 1996 EIR. Following the presentation of the requirements related to the cumulative impact analyses and a description of the related projects (Section 4.1.1 and 4.1.2 respectively), the analysis in Section 4.2 addresses each of the resource areas analyzed in this Draft SEIR.

4.1.1 REQUIREMENTS FOR CUMULATIVE IMPACT ANALYSIS

The State CEQA Guidelines (14 California Code of Regulations 15130) require a reasonable analysis of the significant cumulative impacts of a Proposed Project. Cumulative impacts are defined by CEQA as "two or more induvial effects which, when considered together, are considerable or which compound or increase other environmental impacts" (State CEQA Guidelines, Section 15355).

Cumulative impacts are further described as follows:

a. The individual effects may be changes resulting from a single project or a number of separate projects.
b. The cumulative impacts from several projects are the changes in the environment, which result from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (40 Code of Federal Regulations 1508.7 and State CEQA Guidelines, Section 15355[b]).

Furthermore, according to State CEQA Guidelines Section 15130(a)(1):

> *As defined in Section 15355, a "cumulative impact" consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part of the project evaluated in the EIR.*

In addition, as stated in the State CEQA Guidelines, Section 15064(i)(5):

> *The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.*

Therefore, the following cumulative impact analysis focuses on whether the impacts of the Proposed Project make a cumulatively considerable contribution to a significant cumulative impact within the context of impacts caused by other past, present, or future projects. The cumulative impact scenario considers other projects proposed within the area defined for each resource that would have the potential to result in a significant cumulative impact.

The CEQA Guidelines set forth two methods, which may be use singly or in combination, for identifying related area projects with a potential to contribute, along with the Proposed Project, to cumulative impacts: the "list of projects" methodology (based on a list of past, present, and probable future projects producing related impacts) or the "summary of projections" methodology (based on a summary of projections in adopted local, regional or statewide plans, a related planning document, or an environmental document that has been adopted or certified) (Guidelines section 15130[b]). For this Draft SEIR, impacts are evaluated using a list of closely related projects that would be constructed in the cumulative geographic scope, which differs by resource and sometimes for impacts within a resource. The cumulative regions of influence are documented in Section 4.2 below. The list of related projects is provided in Table 4-1 in Section 4.1.2 below.

4.1.2 PROJECTS CONSIDERED IN THE CUMULATIVE ANALYSIS

A total of 42 current or reasonably foreseeable future projects (approved or proposed) were identified within the general vicinity of the Proposed Project that could contribute to cumulative impacts. The locations of these projects are shown in Figure 4-1. A corresponding list of the cumulative projects is provided in Table 4-1 compiled from sources that include the LAHD, the Port of Long Beach, Army Corps of Engineers, Alameda Corridor Transportation Authority and Caltrans Projects, Intermodal Container Transfer Facility (ICTF) Joint Powers Authority Los Angeles, Community of San Pedro, Community of Wilmington, the City of Carson, the City of Los Angeles and other local jurisdictions. As discussed in Section 4.1.1 and further in the resource-specific sections below, analysis of some resource areas uses a projection approach encompassing a larger cumulative geographic scope and, for these resources, a larger set of past, present, and reasonably foreseeable future projects was

included for analysis of cumulative impacts. This approach uses a summary of projections in an adopted planning document, or prior document that evaluates regional or areawide conditions.

For the purposes of this Draft SEIR, the Project vicinity is defined as the area over which effects of the Proposed Project could contribute to cumulative effects. The cumulative regions of influence for individual resources are documented further in each of the resource-specific subsections in Section 4.2.

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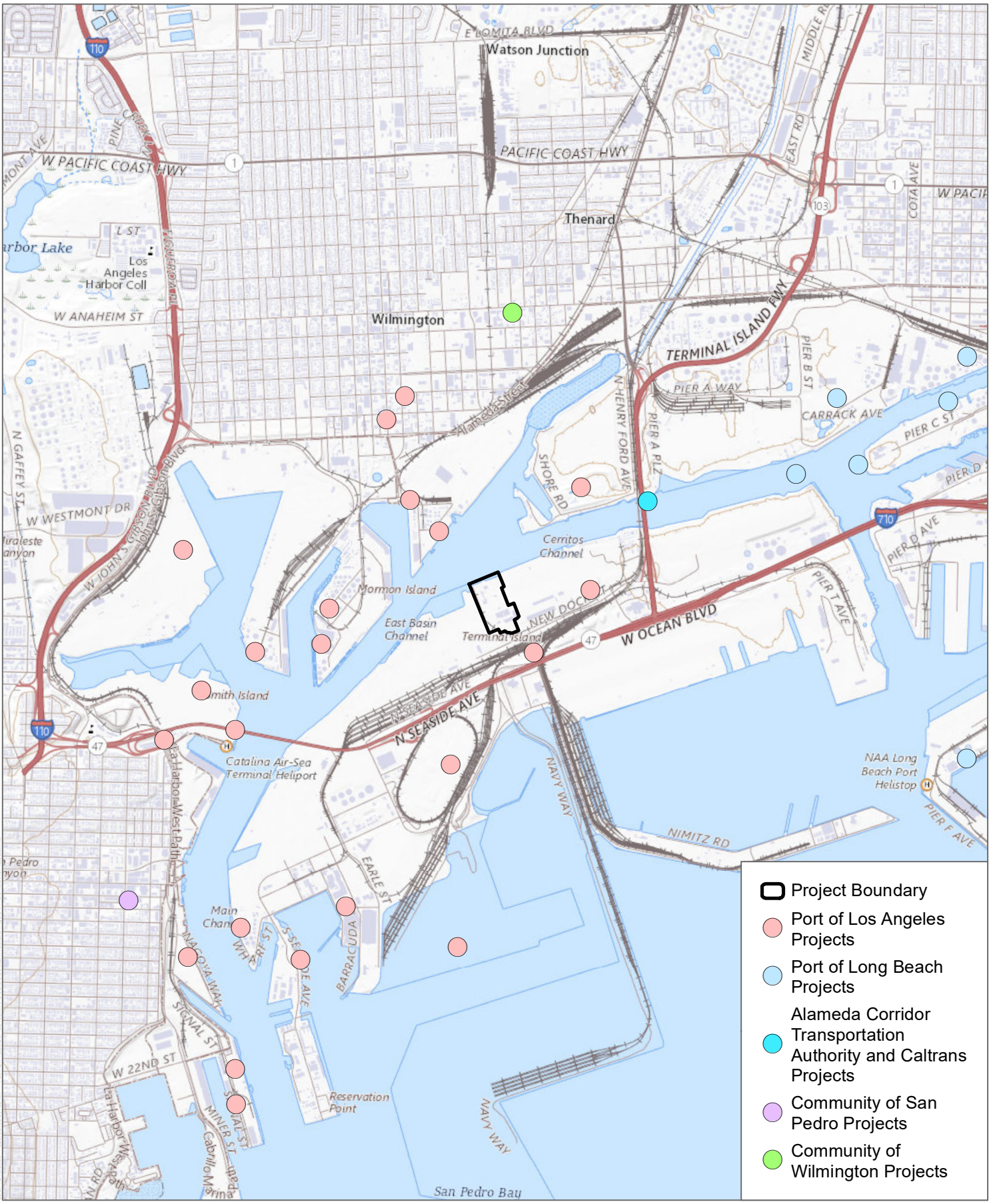

SOURCE: USGS 7.5-Minute Series Long Beach & Torrance Quadrangles

DUDEK

0 1,650 3,300 Feet
0 475 950 Meters
1:40,000

FIGURE 4.1

Locations of Related and Cumulative Projects

SA Recycling Amendment to Permit No. 750 Project Draft Subsequent EIR

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Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
		Port of Los Angeles Projects	
1.	Berth 163-164 [Nustar-Valero] Marine Oil Terminal Wharf Improvements Project	The project involves demolishing the existing 19,000-square-foot timber wharf and constructing a new, steel and concrete loading platform, access trestles, mooring and berthing structures, and necessary utilities to comply with the Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS). The project also consists of a 30-year lease for the facility.	IS/MND approved September 2021, Construction pending.
2.	Berth 191-194 (Ecocem) Low-Carbon Cement Processing Facility	Construction and operation of a dry bulk terminal for vessel unloading, raw material milling, and storage and loading onto trucks of low-carbon construction binder.	Notice of Preparation (NOP) released in March 2022. This is the Proposed Project
3.	Navy Way/Seaside Interchange Project	Construction of roadway improvements at SR-47/Navy Way to eliminate traffic signal and movement conflicts. The project would augment an existing partial interchange at SR 47/Seaside Avenue/Navy Way by removing the last traffic signal and at-grade intersection between Interstate [I]-710 and I-110, adding a new auxiliary lane and a new collector-distributor road, and implementing traffic channelization improvements.	Environmental review in process.
4.	Remove Ave. Marine Services Support Yard	Construction of roadway improvements at SR-47/Navy Way to eliminate traffic signal and movement conflicts. The project would augment an existing partial interchange at SR 47/Seaside Avenue/Navy Way by removing the last traffic signal and at-grade intersection between Interstate [I]-710 and I-110, adding a new auxiliary lane and a new collector-distributor road, and implementing traffic channelization improvements.	Environmental review in process.
5.	Westway Decommissioning	Decommissioning of the Westway Terminal along the Main Channel (Berths 70–71). Work includes decommissioning and removing 136 storage tanks with total capacity of 593,000 barrels and remediation of the site.	Decommissioning completed in 2013. Remediation planning underway.
6.	Berths 97–109, China Shipping Development Project	Development of the China Shipping Terminal Phase I, II, and III including wharf construction, landfill and terminal construction, and backland development, including operation under a revised project to modify certain mitigation measures.	Final Supplemental EIR (FSEIR) completed in 2019. Impact levels assumed in this Draft EIS/EIR are those disclosed in the FSEIR
7.	Berths 191-194 (Ecocem) Low-Carbon Cement Processing Facility	Construction and operation of a dry bulk terminal for vessel unloading, raw material milling, and storage and loading onto trucks of low-carbon construction binder.	NOP released in March 2022. EIR in preparation.
8.	Wilmington Waterfront Master Plan (Avalon Boulevard Corridor Project)	Planned development intended to provide waterfront access and promoting development specifically along Avalon Boulevard. Project elements include a promenade, waterfront park, pedestrian bridge, location for the Wilmington Youth Sailing and Aquatic Center, public pier, and other visitor serving uses.	Construction underway in phases.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
9.	Berth 44 Boatyard Project	The project includes redevelopment of the former San Pedro Boatworks site at 2945 Miner Street. Project components include demolition of existing structures and buildings on site; grading; paving; and constructing concrete pads, docks, gangways, slips, underground utilities, water treatment systems, storm drain, fencing, lighting, and buildings to support boatyard operations.	Environmental review in process.
10.	Berths 206-209 Chassis Depot and Repair Facilities	Use of existing warehouses at 849 E. New Dock St and 921 E. New Dock St for chassis depot, storage, maintenance and repair.	Final ND certified July 2019.
11.	Berths 121–131 Container Terminal Improvements Project	Demolish existing wharf at Berths 126-129, construct a new wharf, install up to 10 new wharf cranes, reconstruct the shoreline, dredge and dispose of up to 310,000 cy of sediments to deepen the berth, expand the existing on-dock railyard and install electric-powered RMG cranes for railcar loading/unloading.	NOI/NOP released in 2014. EIR/EIS in preparation.
12.	Berths 148-151 (Phillips 66) Marine Oil Terminal Improvement Project	Various wharf and seismic ground improvements that are required in order to comply with MOTEMS and a new 20-year entitlement.	IS/NOP released March 2022; EIR in preparation.
13.	Terminal Island Maritime support Facility	The project includes the development and operation of a maritime support facility on an approximately 80-acre LAXT loop site on Terminal Island.	Environmental review in process.
14.	Maintenance Dredging	Maintenance dredging is the routine removal of accumulated sediment from channel beds to maintain the design depths of navigation channels, harbors, marinas, boat launches, and port facilities. This is conducted regularly for navigational purposes (at least once every 5 years).	Continuous, but intermittent on average every 3–5 years.
15.	Outer Harbor Cruise Terminal and Outer Harbor Park	Construction of two new, cruise terminals that would total up to 200,000 square feet (approximately 100,000 square feet each) and parking at Berths 45–47 and 49–50 in the Outer Harbor. The terminals would be designed to accommodate the berthing of a Freedom Class or equivalent cruise vessel (1,150 feet in length). A proposed Outer Harbor Park would encompass approximately 6 acres at the Outer Harbor. This project was evaluated in the San Pedro Waterfront Project EIS/EIR certified in September 2009.	Draft Request for Proposal for future development released January 2023.
16.	City Dock No. 1 Marine Research Project (AltaSea)	This project includes development of a marine research center within a 28-acre area located between Berths 57–72. This project would change the break bulk areas east of East Channel (Berths 57–72) to institutional uses.	Phase I development in progress since 2017.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
17.	West Harbor Modification Project (formerly San Pedro Public Market)	This project includes redevelopment of 30 acres, formerly known as the Ports O' Call Village, which involves development of a 108,000-square-foot outdoor amphitheater, an entertainment venue 2.5 acres in size, a 100-foot-diameter Ferris wheel with an approximately 150-foot-tall by 50-foot-wide tower attraction and other visitor-serving commercial uses This project was evaluated in the San Pedro Waterfront Project EIS/EIR certified in September 2009.	NOP released in April 2022. Conceptual planning by private developer ongoing.
18.	Anchorage Road Soil Storage Site (ARSSS) Open Space	This project would create approximately 30 acres of passive open space at the ARSSS. The project may also include undergrounding utilities and roadway improvements at the Anchorage and Shore Road intersection.	On hold.
19.	SR-47/Vincent Thomas Bridge & Front St./Harbor Blvd. Interchange Reconfiguration	Reconfigure the existing interchange at State Route 47/Vincent Thomas Bridge and Harbor Boulevard/Front Street to improve safety and operation for vehicles exiting the highway. Improvements also include modifications of the eastbound entrance ramps and modification of Harbor Boulevard and Front Street approaching and between the ramp termini.	Design underway.
20.	Workforce Training Center	The project includes development of an approximately 20-acre site at 1440 Anchorage Road for a goods movement workforce training.	Environmental review in process.
21.	Al Larson Boat Shop Improvement Project	Modernization of existing boat yard and 30-year lease extension. This project was evaluated in a Final EIR approved in 2009.	Project on hold.
22.	Berths 302–306 [APL now known as Fenix Marine] Container Terminal Project	Improvements and expansion of the existing terminal, including the addition of cranes, modifications to the main gate, converting an existing dry container storage unit to a refrigerated unit, and the expansion of the terminal onto 41 acres adjacent to the existing terminal. Revised project includes continued operations with minor modifications to the terminal and a 15-year lease extension through 2043. This project was evaluated in a Final EIR in 2012 and Addendum in 2016.	Expansion project on hold, revised project ongoing.
23.	Berths 238-239 [PBF Energy] Marine Oil Terminal Improvement Project	Demolition of the existing Berth 238 loading platform and construction of a new platform and associated mooring structures at Berth 238, and installation of landside improvements.	Construction pending.
24.	Star-Kist Cannery Facility	Demolition of 14-acre site for future use as cargo support or container chassis storage.	BHC adopted Mitigated Negative Declaration February 2023; construction pending.
25.	Berths 167-169 [Shell] Marine Oil Terminal Wharf Improvements Project	Various wharf and seismic ground improvements that are required in order to comply with MOTEMS, as well as other landside elements and a new 30-year lease. This project was evaluated in a Final EIR approved in 2018.	Construction is pending.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
26.	Avalon and Fries Street Segments Closure Project	Physical closure of segments of Avalon Boulevard and Fries Avenue by installing street modifications that include cul-de-sacs, curbs and gutters, and fencing and signage.	Construction is pending.
27.	Avalon Freight Services Relocation Project	Shifting existing Catalina Island freight operations from Berth 184 in Wilmington to Berth 95 in San Pedro.	Construction pending.
28.	Berths 187-191 (Vopak) Liquid Bulk Terminal Wharf Improvements and Cement Terminal Project	Various wharf and improvements that are required in order to comply with MOTEMS, improvements to an adjacent wharf to facilitate resumption of cement terminal operations on the site, and a new 30-year entitlement.	IS/NOP issued July 2022. EIR in preparation.
		Port of Long Beach Projects	
29.	Piers G & J Terminal Redevelopment Project, Port of Long Beach	Redevelopment of two existing marine container terminals into one terminal. The Piers G and J redevelopment project is in the Southeast Harbor Planning District area of the Port of Long Beach. The project will develop a marine terminal of up to 315 acres by consolidating two existing terminals on Piers G and J and several surrounding parcels. Construction will occur in four phases and will include approximately 53 acres of landfills, dredging, concrete wharves, rock dikes, and road and railway improvements.	Approved project. Construction ongoing.
30.	Pier B Rail Yard Expansion (On-Dock Rail Support Facility)	Expansion of the existing Pier B Rail Yard in two phases, including realignment of the adjacent Pier B Street and utility relocation.	FEIR certified February 2018. Construction pending.
31.	Mitsubishi Cement Corporation Facility Modifications	Facility modification, including the addition of a catalytic control system, construction of four additional cement storage silos, and upgrading existing cement unloading equipment on Pier F.	Project approved in April 2015. Construction commenced June 2021.
32.	Southern California Edison Transmission Tower Replacement Project	Replace a series of transmission towers across the Cerritos Channel.	FEIR certified in 2017. Construction completed in August 2021. Demolition of old towers underway.
33.	Toyota Facility Improvements Project	Construction of a new consolidated Vehicle Processing and Distribution Center, Hydrogen Call and Generator Facility, and Fueling Station. Demolition of some existing facilities.	Mitigated Negative Declaration adopted in 2018. Construction ongoing.
34.	World Oil Tank Installation Project	Installation and operation of two 25,000-barrel petroleum storage tanks.	Environmental review underway.
		Army Corps of Engineers	
35.	Deep Draft Navigation and Main Channel Deepening Project	Dredge up to 10 million cubic yards of material to deepen channels, basins, and standby areas to improve waterborne transportation efficiencies and navigational safety for vessel operations. A new dredge substation may be constructed to provide electricity to dredge equipment.	FEIR/EIS underway.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
		Alameda Corridor Transportation Authority and Caltrans Projects	
36.	Schuyler Heim Bridge Replacement and State Route (SR) 47 Terminal Island Expressway	ACTA/Caltrans project to replace the Schuyler Heim Bridge with a fixed structure and improve the SR-47/Henry Ford Avenue/ Alameda Street transportation corridor by constructing an elevated expressway from the Heim Bridge to SR 1 (Pacific Coast Highway [PCH]).	Construction completed. Elevated expressway deferred indefinitely.
		ICTF Joint Powers Authority	
37.	Union Pacific Railroad ICTF Modernization and Expansion Project	Union Pacific proposal to modernize existing intermodal yard 4 miles from the Port.	Draft EIR on hold.
		Community of San Pedro Projects	
38.	Pacific Corridors Redevelopment Project, San Pedro	Development of commercial/retail, manufacturing, and residential components. Construction underway of four housing developments and Welcome Park.	Project underway. Estimated 2032 completion year according to City of Los Angeles Planning Department.
		Community of Wilmington Projects	
39.	Wilmington Redevelopment Plan Amendment/ Expansion Project, Wilmington	The existing Wilmington Industrial Park would be expanded by an additional 2,487 acres, for a total of approximately 2,719 acres. Under the probable maximum level of development, the overall project area could support up approximately 7,326 residential units (primarily multifamily; zone changes under the Plan would permit multi-use and higher density residential development). In addition to the residential development, the Project could accommodate up to approximately 207 acres (9 million square feet) of commercial development and up to 333 acres (14.5 million square feet) of industrial development.	NOP for Program EIR released for public review in August 2010. Currently on hold.
		City of Carson (north of Figure 4-1)	
40.	Carson Stormwater and Runoff Capture Project	Excavation of a 1.5-acre parcel at Sepulveda Blvd and Figueroa St and installation of an underground stormwater storage facility and associated infrastructure to store up to 17 acre-feet of water.	Negative Declaration adopted 2017.
41.	Phillips 66 Los Angeles Carson Plant – Crude Oil Storage Capacity Project	Increase crude oil storage capacity at the Los Angeles Refinery Carson Plant by installing one new 615,000 barrel crude oil storage tank with a geodesic dome, increasing the annual permit throughput limit of two existing 320,000 barrel crude oil storage tanks, and installing geodesic domes on the same two existing 320,000 barrel crude oil storage tanks. Tie-ins to the Pier "T" crude oil delivery pipeline from Berth 121 would be installed.	Final ND approved December 2014. Currently under construction.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
42	Shell Carson Facility Ethanol (E10) Project	Conversion of existing 69,000 bbl gasoline storage tanks to ethanol service. The EIR for this project included the following project objectives: 1. Increase the Carson Facility's ethanol storage capacity by approximately 75%; 2. Increase ethanol tanker-truck loading capacity by at least 75%; 3. Include modifications that would minimize impacts to its existing capacity to receive, store and deliver other petroleum products at current levels; and 4. Maintain operational efficiency, safety and flexibility.	FEIR published December 2012.

4.2 Cumulative Impact Analysis

The following sections analyze the cumulative impacts identified for each resource area relative to the Proposed Project and the list of related projects identified in Table 4-1. The discussion of the impacts of past, present, and reasonably foreseeable future projects refers to the list of projects and reference numbers as shown in Table 4-1.

4.2.1 AIR QUALITY

4.2.1.1 Scope of Analysis

The region of analysis for cumulative effects on AQ-1 (regional air quality) is the South Coast Air Basin (SCAB). For AQ-2 (localized effects on air quality), the South Coast Air Quality Management District (SCAQMD) typically assesses cumulative projects within 1 mile of a project site. For AQ-4 (health effects), the area of influence includes the cumulative projects within the Port complex and their effects on the surrounding communities of San Pedro, Wilmington, and Long Beach. For AQ-3 (Odors) cumulative projects within 1 mile of the Project site will be assessed. For AQ-5 (Consistency with Applicable Plans) the area of influence includes the cumulative project within the Port complex.

4.2.1.2 Methodology and Baseline for Cumulative Air Quality Impacts

CEQA Baseline for Cumulative Air Quality Impacts

The CEQA Baseline is discussed in detail in Section 2.4.7 of Chapter 2, Project Description. In summary, the CEQA Baseline for the Proposed Project is existing operation in Fiscal Year 2021/2022. Emissions were calculated using the methodology discussed in detail in Section 3.1.4.

Criteria Pollutants

As described in Section 3.1, Air Quality and Meteorology, air quality within the SCAB has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly due to lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend towards cleaner air has occurred despite continued population growth. Even so, stationary industrial and mobile emission sources and topographical/meteorological conditions that inhibit atmospheric dispersion combine to create adverse pollution effects in the SCAB.

The U.S. Environmental Protection Agency (EPA) currently classifies the SCAB as in "extreme" nonattainment of the National Ambient Air Quality Standard (NAAQS) for ozone (O_3) (8-hour standard) and in "serious" nonattainment for fine particulate matter ($PM_{2.5}$) (24-hour standard) (CARB 2022). The SCAB is in attainment of the NAAQS for particulate matter (PM_{10}), carbon monoxide (CO), sulfur dioxide (SO_2), and nitrogen dioxide (NO_2) (CARB 2022).

The California Air Resources Board (CARB) currently classifies the SCAB as in nonattainment of the California Ambient Air Quality Standards (CAAQS) for O_3, PM_{10}, and $PM_{2.5}$ (CARB 2022). The SCAB is in attainment of the CAAQS for NO_2, SO_2, CO, lead, and sulfates and is unclassified for hydrogen sulfide and visibility-reducing particles (CARB 2022). The 2022 South Coast Air Quality Management Plan (AQMP) predicts that the SCAB will reach attainment of the 2015 ozone 8-hour standard by 2037, but only if substantial reductions in nitrogen oxide (NO_x) emissions, especially from federally regulated sources such as heavy-duty trucks, trains, and oceangoing vessels, can be achieved (SCAQMD 2022).

Criteria pollutant emissions were calculated using the methodology presented in Section 3.1.4 and significance thresholds are presented in Section 3.1.5. The Proposed Project's contributions to cumulative impacts for criteria pollutants were assessed using SCAQMD's guidance, which states that projects that exceed SCAQMD's project-level significance thresholds are considered by the SCAQMD to be cumulatively considerable. Conversely, projects that do not exceed the project-level thresholds are not considered to be cumulatively considerable (SCAQMD 2003). Because SCAQMD guidance does not distinguish between attainment and nonattainment pollutants, this analysis assumes that for Cumulative Impacts AQ-1 and AQ-2 exceedance of any project-level threshold would also constitute a cumulatively considerable contribution.

Toxic Air Contaminants

According to SCAQMD's MATES V study, the cancer risk in 2018 from inhalation of toxic air contaminants (TAC) in the communities in the vicinity of the San Pedro Bay ports was estimated at 504 in one million (SCAQMD 2021). Although the MATES V results showed a 40% decrease in cancer risk from the MATES IV study in 2013 (SCAQMD 2015), and a basin-wide 84% decrease since the MATES II study in 1998 (SCAQMD 2000), health risk from air toxics in the port area remains elevated above the risks in communities elsewhere in the Basin.

To reduce Port-related cancer risks in adjacent communities, the Ports of Los Angeles and Long Beach approved Port-wide air pollution control measures through implementation of the San Pedro Bay Ports Clean Air Action Plan (CAAP), designed with the goal of reducing diesel particulate matter (DPM) emissions by 77%, compared to 2005 emissions, by 2023. In developing the San Pedro Bay Standards, the Port recognized the importance of ensuring that new projects are designed to be consistent with the CAAP as well as with other applicable regulations allowing the Port to meet long-term health risk and emission reduction goals. According to the latest report (POLA 2023), the Port has met the CAAP's emission reduction goals for DPM.

Notwithstanding, given the existing elevated cancer risk in communities surrounding the Port, this analysis assumes that any increase in health impacts (individual cancer risk, chronic hazard index, acute hazard index, population cancer burden) above the CEQA baseline, resulting from the Proposed Project, would be cumulatively considerable. TAC emissions were calculated using the methodology presented in Section 3.1.4 and significance thresholds are presented in Section 3.1.5.

4.2.1.3 Cumulative Impact AQ-1: Would the Proposed Project result in emissions that would make a cumulatively considerable contribution to regional air quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Phase 1 – Continued Operations of the Proposed Project would last for up to 10 years and would be followed by Phase 2 – Non-operational Restoration, which would consist of a decommissioning period lasting up to 5 years. During this time, numerous projects would occur concurrently at the Port and surrounding areas (see Table 4-1).

Construction and operation of projects identified in Table 4-1 would be cumulatively significant if their combined emissions would exceed the SCAQMD daily emission thresholds for construction and operation. Because this would almost certainly be the case for the majority of criteria pollutants and O_3 precursors, these projects would result in a significant cumulative air quality impact for PM_{10}, $PM_{2.5}$, NOx, SOx, CO and VOC.

Contribution of the Proposed Project

Criteria pollutant emissions associated with Phase 1 and Phase 2 of the Proposed Project are presented in Table 3.1-7. The table shows that emissions of all criteria pollutants would be less than the CEQA Baseline and as such would not exceed SCAQMD significance thresholds in any of the analyzed years.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project emissions would be less than the CEQA Baseline and would therefore not make a cumulatively considerable contribution to an existing cumulatively significant impact.

4.2.1.4 Cumulative Impact AQ-2: Would the Proposed Project result in ambient air pollutant concentrations that would make a cumulatively considerable contribution to localized air quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Phase 1 of the Proposed Project would last for up to 10 years and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years. During this time, numerous projects would occur concurrently at the Port and surrounding areas (see Table 4-1).

Construction and operation of projects identified in Table 4-1 would be cumulatively significant if their combined emissions would result in ambient pollutant concentrations that would exceed the NAAQS and CAAQS. Although there is no way to be certain if a cumulative exceedance of the thresholds would occur for any pollutant without performing dispersion modeling for each related project, cumulative air quality impacts are likely to exceed thresholds for PM_{10}, $PM_{2.5}$, and NO_2. Cumulative impacts are unlikely to exceed the thresholds for CO and SO_2 because the SCAB is in attainment for CO and SO_2, and project-level modelling evaluations for other large Port projects have calculated levels well below CO and SO_2 thresholds. Consequently, construction and operation of projects identified in Table 4-1 are assumed to result in a significant cumulative air quality impact for PM_{10}, $PM_{2.5}$, and NO_2.

Contribution of the Proposed Project

The SCAQMD developed the Localized Significance Thresholds (LST) methodology to aid CEQA lead agencies in assessing localized air quality impacts from Proposed Projects. This screening methodology, based on on-site emissions, emission area, ambient air quality, and distance to the nearest exposed individual, enables a determination of whether a project would cause or contribute to exceeding air quality standards without the need for a dispersion modeling analysis. The LST is presented in look-up tables for various pollutants, and if on-site emissions fall below the specified levels, the proposed activity is considered compliant with ambient air quality standards.

Criteria pollutant emissions, from on-site activities, associated with Phase 1 and Phase 2 of the Proposed Project are presented in Table 3.1-8. The table shows that emissions would be less than the CEQA Baseline, as such would not exceed SCAQMD LST significance thresholds, and would therefore not exceed ambient air quality standards in any of the analyzed years.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project emissions would be less than the CEQA Baseline and would therefore not make a cumulatively considerable contribution to an existing cumulatively significant impact.

4.2.1.5 Cumulative Impact AQ-3: Would the Proposed Project result in other emissions (such as those leading to odors) that would make a cumulatively considerable contribution that would adversely affect a substantial number of people?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Phase 1 of the Proposed Project would last for up to 10 years and would be followed by Phase 2, which would consist of a decommissioning period lasting up to 5 years. During this time, numerous projects would occur concurrently at the Port and surrounding areas (see Table 4-1). Construction and operation of the cumulative projects identified in Table 4-1 would be cumulatively significant if their combined emissions would result in emissions leading to odors by creating a nuisance under SCAQMD Rule 402.

Contribution of the Proposed Project

The existing industrial setting of the Proposed Project represents an already complex odor environment. As discussed in detail in Section 3.1.6, Impact Determination, odors from Phase 1 and Phase 2 activities of the Proposed Project would be similar to odors produced from existing industrial activities and would be primarily associated with vessels berthed at the terminal and on-site mobile equipment exhaust. Within this context, the Proposed Project would not likely result in changes to the overall odor environment in the vicinity. The distances between Proposed Project emission sources and the nearest sensitive receptors, possible residents at the marina in the East Basin, are far enough away to allow for adequate dispersion of these emissions to below objectionable odor levels. Since the Proposed Project would not result in nuisance odors under SCAQMD Rule 402, it would not result in a cumulatively considerable contribution to odors.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project emissions would not make a cumulatively considerable contribution to odor emissions.

4.2.1.6 Cumulative Impact AQ-4: Would the Proposed Project result in exposure to TACs that would make a cumulatively considerable contribution to human health?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Although the SCAQMD MATES studies have documented substantial decreases in cancer risk to Port-area populations over the past 20 years, health risk from air toxics in the port area remains elevated compared to many other communities in the SCAB. Consequently, projects identified in Table 4-1 are assumed to result in a significant cumulative impact to cancer risk from TAC exposure. In addition, non-cancer chronic and acute impacts associated with these projects are also assumed to result in significant cumulative impacts from TAC exposure.

As described in Section 3.1.3, Air Quality Regulatory Setting, the Port has approved port-wide air pollution control measures through the CAAP (POLA and POLB 2010, 2017). Implementation of those measures would reduce the health risk impacts from the Proposed Project and future projects at the Port. Existing regulations and future rules proposed by CARB and the U.S. EPA (see Section 3.1.3) would also further reduce air emissions and associated cumulative health impacts from Port operations. However, because future proposed measures (other than CAAP measures) and rules have not been adopted, they have not been accounted for in the emission calculations or health risk evaluation for the Proposed Project. Therefore, it is unknown at this time how those future measures would reduce cumulative health risk impacts within the Project area. Accordingly, airborne cancer and non-cancer impacts within the Project region may be considered to be cumulatively significant.

Contribution of the Proposed Project

As discussed in detail in Section 3.1.6, Phase 1 activities would result in emissions from engine exhaust in the form of DPM and TAC emissions from vessel and tugboat activity, vehicle activity, and on-site metal processing/handling. Since Phase 1 activity would remain unchanged from the CEQA Baseline, corresponding TAC emissions would either stay the same or be lower than the CEQA Baseline; emission reductions would be expected due to the adoption of cleaner engines and electrification in compliance with regulatory requirements.

Phase 2 activities would also generate DPM and TAC emissions from vessel and tugboat activity, vehicle activity, and on-site metal processing/handling. However, Phase 2 would involve the use of only one vessel on a single day, compared to 28 vessels annually associated with Phase 1 and the CEQA Baseline. Phase 2 non-vessel activities would be a fraction of Phase 1 and CEQA Baseline emissions. Consequently, Phase 2 activities would be less intensive and result in lower TAC emissions compared to both Phase 1 activities and the CEQA Baseline.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project impacts would be less than the CEQA Baseline and would therefore not make a cumulatively considerable contribution to an existing cumulatively significant impact.

4.2.1.7 Cumulative Impact AQ-5: Would the Proposed Project result in a cumulatively considerable contribution to a conflict with or obstruction of implementation of an air quality plan?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Phase 1 of the Proposed Project would last for up to 10 years and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years. During this time, numerous projects would occur concurrently at the Port and surrounding areas (see Table 4-1). Construction and operation of the cumulative projects identified in Table 4-1 would be cumulatively significant if their combined construction and operation would result in emissions that would conflict with or obstruct SCAQMD's 2022 South Coast AQMP.

The 2022 South Coast AQMP and prior iterations include emission reduction measures that are designed to bring the SCAB into attainment of the state and national ambient air quality standards. The 2022 South Coast AQMP contains attainment strategies that include mobile source control measures and clean fuel projects that are enforced at the state and federal levels on engine manufacturers and petroleum refiners and retailers. SCAQMD also adopted AQMP control measures

into the SCAQMD rules and regulations, which are then used to regulate sources of air pollution in the SCAB. The cumulative projects identified in Table 4-1 would be required to comply with all such requirements and regulations, to be consistent with the AQMP, and to implement all feasible mitigation measures should a significant project-related and/or cumulative impact be identified. As such, these projects should not produce cumulative impacts with adherence to the existing AQMP.

Contribution of the Proposed Project

As discussed in detail in Section 3.1.6, the Phase 1 and Phase 2 activities of the Proposed Project would result in emissions of nonattainment criteria pollutants, primarily from diesel combustion exhaust in vessels, tugboats, trucks, and on-site equipment. Similar to the cumulative projects identified in Table 4-1, Phase 1 and Phase 2 activities would comply with the 2022 South Coast AQMP control measures and all SCAQMD rules and regulations, which are used to regulate sources of air pollution in the SCAB. Compliance with these control measures, rules and requirements would ensure that the Phase 1 and Phase 2 activities would not obstruct implementation of the AQMP. Thus, the Proposed Project would not produce cumulatively considerable impacts that would obstruct or conflict with an air quality plan.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project impacts would not make a cumulatively considerable contribution that would obstruct or conflict with an air quality plan.

4.2.2 CULTURAL RESOURCES

4.2.2.1 Cumulative Impact CR-1: Would the Proposed Project result in a cumulatively considerable contribution to the change of significance of a historic resource as defined in CEQA Guidelines Section 15064.5?

A cumulative Impact to built environment historical resources, refers to the mounting aggregate effect upon historic resources due to modern or recent historic land use that result from human acts. The issue that must be explored in a cumulative impact analysis is the aggregate loss of information and the loss of recognized cultural landmarks and vestiges of a community's cultural history.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. There are 42 projects identified for cumulative analysis as shown in Table 4-1 and illustrated in Figure 4-1. The closest cumulative project to the Project site is approximately less than 0.25 miles south of the Proposed Project site (see Table 4-1 and Figure 4-1). Phase 1 of the Proposed Project would involve up to 10 years of continued operations, and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years and would involve the demolition of all on-site structures. During this time, numerous cumulative projects identified on Table 4-1 would occur concurrently at the Port and surrounding areas.

Ongoing development and growth in the broader Project area may result in a cumulatively significant impact to historically significant resources due to the continuing demolition and alteration of structures to accommodate new development areas that could potentially contain significant historic resources. The Proposed Project would be required to comply with all federal, state, and local requirements related to historical resources. Other related cumulative projects would similarly be required to comply with all such requirements and regulations, to be consistent with the provisions set forth by CEQA and

the CEQA Guidelines, and to implement all feasible mitigation measures should a significant project-related and/or cumulative impact to historic resources be identified. As such, cumulative impacts should be less than significant with adherence to existing regulatory requirements.

Contribution of the Proposed Project

As discussed in Section 3.2, Cultural Resources, no built environment CEQA historical resources were identified on the Proposed Project site or in the Proposed Project Area. Therefore, there are no new impacts to CEQA Historical Resources with the implementation of the Proposed Project. Consequently, the Proposed Project would not result in a cumulatively considerable contribution to a change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. All construction projects would have to adhere to applicable regulatory requirements regarding historic resources and the Proposed Project would not result in impacts to historic resources. As such, cumulatively considerable impacts would not occur.

4.2.2.2 Cumulative Impact CR-2: Would the Proposed Project cause a cumulatively considerable contribution to the change of significance of an archaeological pursuant to CEQA Guidelines Section 15064.5?

A cumulative impact to archaeological resources refers to the mounting aggregate effect upon cultural resources due to modern or recent historic land use that result from human acts or natural acts such as erosion. The issue that must be explored in a cumulative impact analysis is the aggregate loss of information and the loss of recognized cultural landmarks and vestiges of a community's cultural history.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. There are 42 projects identified for cumulative analysis as shown in Table 4-1 and illustrated in Figure 4-1. The closest cumulative project to the Project site is approximately less than 0.25 miles south of the Proposed Project site (see Table 4-1 and Figure 4-1). Phase 1 of the Proposed Project would involve up to 10 years of continued operations, and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years and would involve the demolition of all onsite structures, removal of all pavement and the excavation of soil during restoration. During this time, numerous cumulative projects identified on Table 4-1 would occur concurrently at the Port and surrounding areas.

Because all archaeological resources are unique and nonrenewable resources, projects that demolish or alter certain archaeological resources have the potential to erode a general cultural landscape to which the archaeological resources belong. Therefore, implementation of the Proposed Project could result in a cumulatively significant effect on unknown archaeological resources when combined with other cumulative development in the area due to the loss of identified or unknown archaeological resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a resource would be materially impaired. However, all the cumulative projects identified in Table 4-1 are required to adhere to compliance with CEQA regulations and to implement mitigation measures when significant impacts are identified. This will ensure that cumulative impacts to unknown archaeological resources would be less than significant with adherence to existing regulatory requirements.

Contribution of the Proposed Project

As discussed in Section 3.2.6, there are no known significant archaeological resources pursuant to CEQA Guidelines Section 15064.5 present on the Proposed Project site, and similar to the cumulative projects listed in Table 4-1, the Proposed Project would be required to adhere to compliance with CEQA regulations, standard conditions of approval as well as existing Port construction specifications that ensure that impacts to unknown archaeological resources would not create any new significant impacts or substantially more severe impacts. As such, the Proposed Project would not result in a cumulatively considerable impact to archaeological resources.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. All construction projects would have to adhere to applicable CEQA regulations and regulatory requirements for the inadvertent discovery of archaeological resources. Thus, there would be no cumulatively considerable impacts to archaeological resources.

4.2.2.3 Cumulative Impact CR-3: Would the Proposed Project result in a cumulative impact to paleontological resources or unique geological features?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Because all paleontological resources are unique and nonrenewable resources, projects that alter certain resources have the potential to erode the fossil record or geological setting to which the paleontological resources belong. Therefore, implementation of the Proposed Project could result in a cumulatively significant effect on paleontological resources when combined other cumulative development in the area if identified or unknown unique paleontological resources are destroyed, lost or materially impaired during project excavation or construction.

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. There are 42 projects identified for cumulative analysis as shown in Table 4-1 and illustrated in Figure 4-1. The closest cumulative project to the Project site is approximately less than 0.25 miles south of the Proposed Project site (see Table 4-1 and Figure 4-1).

Phase 1 of the Proposed Project would involve up to 10 years of continued operations, and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years and would involve the demolition of onsite structures, the removal of all pavement and the excavation of all soil during restoration. During this time, numerous cumulative projects identified on Table 4-1 would occur concurrently at the Port and surrounding areas. Ongoing development and growth in the broader Project area may result in a cumulatively significant impact to paleontological resources due to the continuing disturbance of undeveloped areas, which could potentially contain significant paleontological resources. These projects would be required to comply with all federal, state, and local requirements and regulations related to paleontological resources, and to implement all feasible mitigation measures should a significant project-related and/or cumulative impact be identified. As such, cumulative impacts would be less than significant with adherence to existing regulatory requirements.

Contribution of the Proposed Project

As discussed in Section 3.2.6, no prehistoric sites have been identified in the Proposed Project site or within a 0.25-mile radius of the site. Furthermore, the geologic formation within the Project site is man-made artificial fill created in the 20th Century. The location is on Terminal Island, which has been

subject to extensive previous construction activity. This activity has likely destroyed any unique paleontological resources and any unique geologic features. The Proposed Project excavation would not occur on any geologic layer that could yield unique paleontological resources. Therefore, there would be no cumulatively considerable impact to unique paleontological resources or unique geologic features caused by the Proposed Project.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. All construction projects would have to adhere to applicable regulatory requirements for paleontological resources. Thus, there would be no cumulatively considerable impacts to paleontological resources or unique geological features.

4.2.2.4 Cumulative Impact CR-4: Would the Proposed Project cause a cumulatively considerable contribution in the disturbance of any human remains, including those interred outside of formal cemeteries?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Because human remains are unique and nonrenewable resources, projects that demolish, destroy, alter or move human remains have the potential to erode a general cultural landscape to which the human remains belong.

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. There are 42 projects identified for cumulative analysis as shown in Table 4-1 and illustrated in Figure 4-1. The closest cumulative project to the Proposed Project site is approximately less than 0.25 miles south of the Proposed Project site (see Table 4-1 and Figure 4-1).

Phase 1 of the Proposed Project would involve up to 10 years of continued operations, and would be followed by Phase 2, which would consist of a restoration period lasting up to 5 years and would involve the demolition of onsite structures, the removal of all pavement and the excavation of soil during restoration. During this time, numerous cumulative projects identified on Table 4-1 would occur concurrently at the Port and surrounding areas. Therefore, development within the area would have the potential to result in a cumulative impact associated with the loss of yet unidentified human remains through the physical demolition, destruction, relocation, or alteration of human remains or their immediate surroundings. However, In the event that human remains are inadvertently encountered during the ground disturbing activities of cumulative projects, they would be treated consistent with state and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5€. Compliance with these regulations would ensure that impacts to human remains. Compliance with these laws and regulations would ensure that impacts to unknown human remains resulting from the cumulative projects would be less than significant.

Contribution of the Proposed Project

As discussed in Section 3.2.6, no prehistoric or historic period burials, within or outside of formal cemeteries, were identified within the Proposed Project site as a result of the California Historical Resources Information System records search. In the event that human remains are inadvertently encountered during ground disturbing activities, they would be treated consistent with state and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e) similar to the cumulative projects. Compliance with these laws and regulations would ensure that impacts to human

remains resulting from the Proposed Project would not cause any new significant impacts. Based on the degree of protection afforded by the aforementioned state regulations and standard conditions as required by the Port, the Proposed Project would not cause a cumulatively considerable contribution in the disturbance of any human remains, including those interred outside of dedicated cemeteries.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. All construction projects would have to adhere to applicable regulatory requirements for the inadvertent discovery of human remains. Thus, there would be no cumulative considerable impacts to human remains.

4.2.3 GREENHOUSE GAS EMISSIONS

4.2.3.1 Scope of Analysis

Scientific evidence indicates a trend of warming global surface temperatures over the past century due largely to the generation of greenhouse gas (GHG) emissions from anthropogenic sources, as further discussed in Section 3.3, Greenhouse Gas Emissions. GHG emissions contribute to global climate change and are in part attributed to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors.

The region of analysis for cumulative GHG effects (GHG-1) is the California state boundary. The region of analysis for the Proposed Project's consistency with relevant plans, policies, and regulations (GHG-2) is also the California state boundary.

4.2.3.2 Methodology and Baseline for Cumulative GHG Impacts

The CEQA Baseline is discussed in detail in Section 2.4.7 of Chapter 2, Project Description. In summary, the CEQA Baseline for the Proposed Project is existing operation in Fiscal Year 2021/2022. The methodology used to quantify GHG emissions associated with the CEQA Baseline and the Proposed Project is discussed in detail in Section 3.3.4. The threshold of significance is defined in Section 3.3.5.

The challenge in assessing the significance of an individual project's contribution to global GHG emissions and associated global climate change impacts is to determine whether a project's GHG emissions, which are at a micro-scale relative to global emissions, make a cumulatively considerable incremental contribution to a macro-scale impact. SCAQMD developed a project-level significance threshold for GHGs. For the purposes of this cumulative discussion, it is conservatively assumed that an exceedance of the project-level threshold would result in a cumulatively considerable contribution to the overall GHG burden.

4.2.3.3 Cumulative Impact GHG-1: Would the Proposed Project result in GHG emissions that would make a cumulatively considerable contribution?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past, present, and reasonably foreseeable future projects in the area (Table 4-1) have generated and will continue to generate GHGs from the combustion of fossil fuels and the use of coatings, solvents, refrigerants, and other products. Current and future projects will incorporate a variety of GHG reduction measures in response to federal, state, and local mandates and initiatives, and these measures are expected to reduce GHG emissions from future projects. However, because of the long-lived nature of

GHGs in the atmosphere and the global nature of GHG emissions impacts, no specific quantitative thresholds of significance under CEQA for GHG emissions from related projects in the region or state-wide have been identified. It is therefore conservatively assumed that GHG emissions related to past, present, and reasonably foreseeable future projects represent a significant cumulative impact.

Contribution of the Proposed Project

GHG emissions associated with Phase 1 and Phase 2 of the Proposed Project are presented in Table 3.3-2. The table shows that GHG emissions would be below the CEQA Baseline and as such would not exceed the SCAQMD threshold of significance. As such, the Proposed Project would not create a new significant cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. Proposed Project GHG emissions would be less than the CEQA Baseline and would therefore not make a cumulatively considerable contribution to an existing cumulatively significant impact.

4.2.3.4 Cumulative Impact GHG-2: Would the Proposed Project result in a cumulatively considerable contribution to conflicting with applicable plans, polices and regulations adopted for the purpose of reducing GHG emissions?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past, present, and reasonably foreseeable future projects in the area (Table 4-1) have generated and will continue to generate GHGs from the combustion of fossil fuels and the use of coatings, solvents, refrigerants, and other products. Current and future projects will incorporate a variety of GHG reduction measures in response to federal, state, and local mandates and initiatives, and these measures are expected to reduce GHG emissions from future projects. It is therefore conservatively assumed that GHG emissions related to past, present, and reasonably foreseeable future projects represent a significant cumulative impact.

Contribution of the Proposed Project

The Proposed Project's consistency with key relevant GHG reduction strategies is presented in Table 3.3-3. The table shows that the implementation of the Proposed Project would not conflict with any of the applicable state and local GHG reducing plans, policies and regulations adopted with the purpose of reducing GHG emissions. As such, the Proposed Project would not create a new significant cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project would not conflict with any key relevant state and local GHG reducing plans, polices and regulations, and would therefore not make a cumulatively considerable contribution to conflicting with applicable plans, polices and regulations adopted for the purpose of reducing GHG emissions.

4.2.4 HAZARDS AND HAZARDOUS MATERIALS

4.2.4.1 Scope of Analysis

The geographic scope for cumulative impacts associated with accidental spills or hazardous materials encompasses the overall Port Complex and Precautionary Area. Past, present, and reasonably foreseeable future projects that could contribute to these cumulative impacts includes those projects that transport hazardous materials in the vicinity of the Port Complex.

The significance criteria for the cumulative analysis are the same as those used for the Proposed Project in Section 3.4, Hazards.

4.2.4.2 Methodology and Baseline for Cumulative Hazardous Impacts

Potential impacts related to hazards and hazardous materials generally relate to the handling, storage, transportation, and potential releases of hazardous materials or petroleum products. In addition, and as is the case with the Proposed Project site, there is the potential for releases of hazardous materials or exposure of humans or the environment to hazardous materials due to the presence of contamination in soil, groundwater, and/or soil vapor on the Project site. In the case of the Project site, or any contaminated site, construction on the site has the potential to release contaminated media, thereby exposing the public or environment, and ongoing occupation has the potential to expose on-site occupants to contaminated media. These effects are typically localized, and when known, are often under the regulatory oversight of a federal, state, or local environmental agency (e.g., U.S. EPA, Department of Toxic Substances Control (DTSC), State Water Resources Control Board).

For the purposes of this evaluation, it can be assumed impacts associated with the Proposed Project would be similar to those on other similar projects in the Port Complex. It is assumed this will consider a worst case scenario for potential impacts.

4.2.4.3 Cumulative Impact HAZ-1: Would the Proposed Project make a cumulatively considerable contribution due to hazards through the routine transport, use or disposal of hazardous materials?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

If concurrent cumulative projects identified in Table 4-1 resulted in off-site migration of hazardous material constituents, this could result in a cumulatively significant impact. However, the Proposed Project's metal recycling operations are unique to the Port Complex, and as such it can be assumed that the potential impacts related to routine transport, use, or disposal of hazardous materials are also unique.

Typically, industrial operations, such as those in the Port Complex, are regulated under federal, state, and local rules and regulations (Section 3.4.3). These regulations are in place to eliminate significant impacts associated with routine operations. It can generally be assumed that cumulative projects and ongoing industrial operations within the Port Complex would adhere to federal, state, and local rules and regulations, and those that do not would be under regulatory oversight for cleanup actions.

Considering the unique operations of the Proposed Project compared with the cumulative projects listed in Table 4-1, and the unique releases resulting in a Consent Order issued by DTSC, it can be assumed that potentially significant impacts are unique to the Project site. As such, cumulative projects are not likely to result in a cumulatively significant impact.

Contribution of the Proposed Project

As discussed in Section 3.4.6.1, the Proposed Project will not result in new or substantially more severe impacts with the implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2. In addition, the operations of the Proposed Project are unique, and impacts, while less than significant, are unique to the Proposed Project. As a result, operation of the Proposed Project would not result in a cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation is required. As discussed in Section 3.4.6.1, the Proposed Project will implement Project-specific mitigation measures (MM-HAZ-1 and MM-HAZ-2) that will ensure all new potential significant impacts will be kept at a less than significant level. In addition, the legally enforceable Consent Order is in place, and actions to address hazardous material releases have been implemented and will continue to be required. While the Proposed Project and nearby cumulative projects will likely involve the routine use of hazardous materials, rules, regulations, and best management practices (BMPs) and protocols are in place for all hazardous materials handling, especially for substances handled above reportable quantities. As a result, routine use, transportation, and storage of hazardous materials during operation of the Proposed Project would not result in a new significant cumulative impact.

4.2.4.4 Cumulative Impact HAZ-2: Would the Proposed Project make a cumulatively considerable contribution to hazards caused to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

As discussed above, concurrent cumulative projects within the Port Complex are not likely to have similar impacts, as proposed operations are not similar. Cumulative projects do have the potential to release hazardous materials to the environment due to accident or upset conditions. Regulations in place that manage the handling of these hazardous materials require written and practicable release prevention and response procedures if reportable quantities of hazardous materials are used on site. Should contaminated media be present, similar to the Proposed Project site, where construction would disturb and potentially release hazardous materials, contaminated media BMPs/protocols will mitigate such releases. These mitigation measures, similar to those proposed for the Proposed Project (see MM-HAZ-1 and MM-HAZ-2 in Section 3.6.4.2), would reduce potentially cumulative impacts to less than significant levels.

Contribution of the Proposed Project

As discussed in Section 3.6.4.2 with the implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2, the Proposed Project would not result in a new foreseeable upset condition associated with the release of hazardous materials and would not result in a cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation is required. As discussed in Section 3.6.4.2, the Project will implement project-specific mitigation measures (MM-HAZ-1 and MM-HAZ-2) that will ensure the Proposed Project would not result

in any new foreseeable upset condition associated with the release of hazardous materials. In addition, a legally enforceable Consent Order is in place, and actions to address alleged off-site migration of hazardous materials has occurred and will continue to be required. As such, on- and off-site releases of hazardous materials have and will continue to be remediated under the Consent Order. Therefore, operation of the Proposed Project would not result in a new cumulatively considerable impact.

4.2.4.5 Cumulative Impact HAZ-3: Would the Proposed Project cumulatively contribute to sites that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Some of the cumulative projects identified in Table 4-1 may also be included on government cleanup databases, and as such would be under regulatory oversight for cleanup of released hazardous materials to the environment. As with the Project site, their presence on this list does not necessarily result in a significant impact, as ongoing remediation as required by these regulatory agencies would ultimately reduce impacts to the environment (i.e., remove hazardous materials from soil, soil vapor, and groundwater during remediation activities). Construction and operation of cumulative projects that are identified on Cortese List databases would not likely result in a cumulative significant impact.

Contribution of the Proposed Project

As discussed in Section 3.4.6.3, the Proposed Project would result in a reduction of impacts associated with groundwater contamination resulting from the leaking underground storage tank release, which is regulated under Los Angeles Regional Water Quality Control Board (LARWQCB) File 90-47. This ongoing remediation would reduce impacts associated with the groundwater contamination plume, and the Proposed Project would not contribute to a significant cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are required, because cleanup and remediation is inherently required for contaminated sites that under regulatory oversight. There would be no cumulatively considerable impacts.

4.2.5 HYDROLOGY AND WATER QUALITY

4.2.5.1 Scope of Analysis

The region of analysis for cumulative effects on hydrology and water quality is the Los Angeles and Long Beach Harbor (Fish Harbor, Inner Harbor, and Outer Harbor areas) as these waters represent the receiving waters of the cumulative projects. As described in Section 3.5.5, the only Port of Los Angeles CEQA significance thresholds that were included in the analysis was HYD-1 (related to violation of water quality standards or waste discharge requirements) and HYD-2 (risk release of pollutants due to inundation from a flood, tsunami, or seiche wave hazard) because the IS/NOP identified no impacts related to changes in drainage patterns that would result in flooding or would exceed planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

As described in Section 3.5.6.4, the Proposed Project does not include any mitigation measures as the impact analysis for both impact criterion determined that the Proposed Project would not substantially increase the frequency or severity of adverse effects related to hydrology or water quality for continued operations nor nonoperational restoration activities.

4.2.5.2 Methodology and Baseline for Cumulative Hydrology and Water Quality Impacts

The methodology used for the cumulative analysis of hydrology water quality impacts considers the existing regulatory framework for the cumulative projects as well as the existing Project's characteristics. As also used in Section 3.5, Hydrology and Water Quality, project characteristics consider that the Proposed Project would continue operations that are already occurring at the site and no physical improvements or material changes to existing operations would occur over the next 10 years. As a result, the baseline for the cumulative analysis includes the existing site operations of the Proposed Project and other existing cumulative projects as identified in Table 4-1, as well as the existing conditions of the Los Angeles and Long Beach Harbors as presented in Section 3.5.2.1.

Potential cumulative impacts associated with the Phase 2 Nonoperational Restoration phase of the Project assume that similar to the Proposed Project analysis, following demolition of on-site structures, the site would be remediated through excavation and off-site disposal of contaminated soils consistent with oversight by the LARWQCB.

4.2.5.3 Cumulative Impact HYD-1: Would the Proposed Project make a cumulatively considerable contribution due to a violation of water quality standards or waste discharge requirements or the degradation of surface or groundwater quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The waters in the Los Angeles and Long Beach Harbors are listed as impaired according to the Clean Water Act and the 303(d) list of impaired waters. The 303(d) list includes the Los Angeles Harbor (Consolidated Slip) as impaired by nickel and Polycyclic Aromatic Hydrocarbons (PAHs), the Inner Harbor impaired by PAHs, and the Outer Harbor (inside the breakwater) also impaired by PAHs.

In 2012, the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants total maximum daily load (TMDL or Harbor Toxics TMDL) was announced by the EPA and the State. This TMDL includes all of the listed water body impairments within the area, all of which are in the sediment, not in the water column. The TMDL essentially consists of an action plan to ultimately restore water quality.

The Harbor Toxics TMDL designates a group of responsible parties including the City of Los Angeles, the City of Long Beach, their respective ports, and several smaller cities upstream of the Harbor area. The responsible parties for the greater harbor waters have formed a regional monitoring coalition to cover the required monitoring aspects of the TMDL. Other aspects of the required monitoring that take place at shorter intervals include water sampling for the list of TMDL-related chemicals, and fish tissue sampling.

The ports of Los Angeles and Long Beach, in coordination with the State of California Los Angeles Regional Water Quality Control Board, designed and performed a comprehensive series of special studies in order to establish a site-specific sediment quality objective for human health (fish tissue) in the harbor. The group, known as the Harbor Technical Working Group, also examined issues related to Harbor Toxics TMDL compliance and oversaw the completion of the harbor hydrodynamic, sediment transport, chemical fate, and bioaccumulation model (linked WRAP model).

Cumulative projects with in-water construction components (e.g., dredging, dike placement, fill, pile driving, and pier maintenance) would result in temporary and localized adverse effects to water quality when

existing contaminated sediments are disturbed. However, these adverse effects are often minimized with implementation of construction methods that minimize disturbances and would generally be localized and temporary. Other sources of pollution include discharges and stormwater runoff or wastewater discharges from the cumulative sites. However, these discharges are currently regulated by the National Pollutant Discharge Elimination System (NPDES) Program and stormwater permits where projects are required to prepare and implement storm water pollution prevention plans (SWPPPs). SWPPPs provide the BMPs and monitoring compliance measures that are designed to minimize the off-site discharge of pollutants. Although existing regulatory compliance measures would apply to existing and future projects, the Harbor is still listed as impaired and included on the Section 303(d) list. Until the TMDL can be fully implemented throughout the entire watershed, the related projects would be cumulatively considerable and result in a cumulatively significant impact to water quality.

Contribution of the Proposed Project

The Proposed Project does not include any in-water construction activities and as a result would not disturb any existing contaminated sediments within the Harbor waters. The Proposed Project only extends current operations at the site and there would be no material changes to the operations such that there would be a negligible change in stormwater discharges from the site. The existing facility has both a SWPPP and Spill Prevention Plan to address any accidental spills of hazardous materials at the site such that containment and spill response measures can be employed to minimize any adverse effects in the unlikely event of a spill or accidental release. As a result, the Proposed Project would not make a cumulatively considerable contribution to adverse effects to water quality during Phase 1 - Continued Operations.

The SWPPP and Spill Prevention Plan would also be implemented during Phase 2 - Nonoperational Restoration activities at the site. The SWPPP would include BMPs to ensure that all demolition activities and site cleanup activities are conducted in a manner that minimizes off-site discharge of pollutants by providing containment methods that have proven effective in reducing adverse effects to insubstantial levels. As a result, the Nonoperational Restoration phase of the Project would not have a cumulatively considerable impact on the Harbor waters.

Mitigation Measures and Residual Cumulative Impacts

With adherence to existing regulatory requirements, the Proposed Project would not have any cumulatively considerable impacts on water quality as a result of runoff and no mitigation measures would be required.

4.2.5.4 Cumulative Impact HYD-2: Would the Proposed Project make a cumulatively considerable contribution due to the risk release of pollutants due to inundation as a result of a flood, tsunami or seiche hazard?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

As noted above, the Los Angeles and Long Beach Harbor waters are impaired and included on the 303(d) list in accordance with the Clean Water Act. Any release of additional pollutants could exacerbate the water quality of the Harbor waters. The majority of the cumulative projects include industrial land uses that involve varying types and quantities of hazardous materials and are located in varying risk levels of inundation by flood or tsunami hazards. Seiche waves are generally related to enclosed bodies of water (e.g., lakes) or semi-enclosed bodies of water, which could include the Inner Harbor area. However, the inundation from a tsunami event is considered to be a higher risk than

seiche waves. In the event of a substantive flood, tsunami or seiche hazard, unsecured or exposed hazardous materials could be at risk of release and result in a cumulatively considerable discharge of pollutants into the Harbor waters.

Contribution of the Proposed Project

The Proposed Project site is not located in a 100-year flood zone, but is located in a tsunami hazard zone. As discussed in Section 3.5.6.2, a flood hazard model was developed for the Port and found that the most likely sources for tsunamis, large offshore earthquakes (M-7.5) in the Port region, are very infrequent and would have a low probability of occurring during the Proposed Project's Phase 1, which is limited to 10 years. In addition, the contaminant sources that would exist at the Project site would be no different than what is already subject to inundation under existing conditions and are subject to existing storage requirements in accordance with regulatory requirements. Phase 2 of the Proposed Project would be an even shorter time frame of just 5 years and therefore would also have a low probability of inundation during that phase of the Project. In addition, Phase 2 operations would not include any substantive increases in the types, quantities or storage methods of hazardous materials at the site while any hazardous materials associated with operations (e.g., fuels, oils, paints, solvents associated with maintenance) would be removed. All remediation activities including the removal of contaminated soils would be conducted under the oversight of the appropriate regulatory agencies. Thus, there would not be any increase in risks of potential pollutants at the Project site. Therefore, contribution of the Proposed Project would not make a cumulatively considerable impact related to risk of release of pollutants from inundation when combined with past, present, and future projects.

Mitigation Measures and Residual Cumulative Impacts

The contribution of the Proposed Project would be less than cumulatively considerable. Therefore, no mitigation measures would be required.

4.3 Mitigation Monitoring

No mitigation is required.

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Chapter 5

Significant Irreversible Changes

5.1 Introduction

Pursuant to Section 15126.2(c) of the State California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) must consider any significant irreversible environmental changes that would be caused by a proposed project should it be implemented. Section 15126.2(c) states:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts, and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

5.2 Analysis of Irreversible Changes

Resources that are committed irreversibly and irretrievably are those that would be used by a project on a long-term or permanent basis. Fossil fuels and other forms of energy would be consumed during the Phase 1 (Continued Operation) of the Proposed Project. Ocean-going vessel fuels, diesel, and gasoline would continue to be used for ships, tugboats, facility operations, and on-road vehicles (trucks and employee automobiles). Electrical energy and natural gas would be consumed during operation.

Non-recoverable materials and energy would be used during the Phase 1 (Continue Operation) and Phase 2 (Nonoperational Restoration Period) activities, but the amounts needed would be accommodated by existing supplies. Although the amounts of materials and energy used would be limited, they would nevertheless be unavailable for other uses. The minimal irreversible changes associated with the Proposed Project likely would be justified by the recycling activity, which the Proposed Project would provide. The irreversible changes associated with the proposed Project are considered justified under CEQA.

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Chapter 6

References

Chapter 1 Introduction

No references were cited in Chapter 1

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Chapter 5 Significant Irreversible

No references were cited in Chapter 5.

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Chapter 7

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Chapter 8

Acronyms and Abbreviations

AB	Assembly Bill
ACM	Asbestos containing material
ACT	Advanced Clean Truck Program
AER	Annual Emissions Reports
AMP	Alternative Marine Power
APCS	Air pollution control system
APSA	Aboveground Petroleum Storage Act
APC	Air pollution control
APCE	Air pollution control equipment
APP	Application for Port Permit
Approved Project	1996 Approved Project
AQMP	Air Quality Management Plan
BACT	Best available control technology
BAT	Best Available Technology
BMPs	Best Management Practices
Board	Board of Harbor Commissioners
C&D	Construction and Demolition
CAA	Clean Air Act
CAAP	Clean Air Action Plan
CAAQS	California Ambient Air Quality Standards
CAC	Certified Asbestos Consultant
CAFÉ	Corporate Average Fuel Economy
CAO	Corrective Action Order
CalARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Mode
CalEPA	California Environmental Protection Agency
CalOSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CCAA	California Clean Air Act
CCR	California Code of Regulations
CCC	California Coastal Commission
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Response, Compensation and Liability Act
CERPs	Community Emissions Reduction Programs
CFC	Chlorofluorocarbons
CH_4	Methane
CHP	California Highway Patrol
CHRIS	California Historical Resources Information System
CTMSR	Chemically treated metal shredder residue
CM	Centimeters
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CRHR	California Register of Historic Resources
CUPA	Certified Unified Program Agencies
CWA	Clean Water Act

CZMA	Coastal Zone Management Act
DDT	Dichlorodiphenyltrichloroethane
DO	Dissolved Oxygen
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
DTSC-SL	Department of Toxic Substances-modified screening levels
DWR	Department of Water Resources
ECA	Emissions Control Act
EIR	Environmental Impact Report
EMFAC	Emission Factors Model
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
ESL	Environmental Screening Levels
FEMA	Federal Emergency Management Agency
ERP	Emergency Response Program
FAR	Floor to Area Ratio
FY	Fiscal year
g/hr	Grams per hour
GHG	Greenhouse gas
GVWR	Gross vehicle weighting rate
GWP	Global warming potential
HC	Hydrocarbon
HCM	Historic Cultural Monument
HERO	Human Ecological Risk Office
HFC	Hydrofluorocarbons
HHRA	Human Health Risk Assessment
Hic	Noncancer-chronic Hazard Index
HIa	Noncancer-acute Hazard Index
HMBP	Hazardous Materials Business Plan
HMIS	Hazardous Material Inventory Statements
hp	horsepower
hp-hr	horsepower-hours
HPOZ	Historic Preservation Overlay Zone
hr/yr	hours per year
HSC	Health and Safety Code
IMO	International Maritime Organization
IPCC	International Panel on Climate Change
IS	Initial Study
IS/NOP	Initial Study/Notice of Preparation
kW	Kilowatts
kW-hr	Kilowatt hours
LA/LB	Los Angeles/Long Beach
LADWP	Los Angeles Department of Water and Power
LAHCM	Los Angeles Historic Cultural Monument
LASAN	Los Angeles Sanitation District
LCFS	Low Carbon Fuel Standard
LNAPL	light non-aqueous phase liquid
LAHD	Los Angeles Harbor Department
LBP	Lead based paint

LAMI	Los Angeles Maritime Institute
LARWQCB	Los Angeles Regional Water Quality Control Board
LID	Low Impact Development
LST	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MARPOL	International Convention for Prevention of Pollution from Ships
MATES	Multiple Air Toxics Exposure Studies
MDO	Marine diesel oil
MGO	Marine gas oil
MG/L	Milligrams per liter
MICR	Maximum Incremental Cancer Risk
MLD	Most Likely Descendent
MM	Millimeters
MMRP	Mitigation Monitoring and Reporting Program
MRP	Monitoring and Reporting Program
MRP	Metal Recovery Plant
MS4	Municipal Separate Storm Sewer System
MSR	Metal Shredder Residue
MT	Metric Ton
MTY	Metric Tons per Year
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	Nitrogen dioxide
N_2O	Nitrous Oxide
NDPES	National Pollutant Discharge Elimination System
NEPA	National Environmental Protection Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHTSA	National Highway Traffic Safety Administration
NOI	Notice of Intent
NOP	Notice of Preparation
NO_x	Nitic Oxide
NRHP	National Register of Historic Places
O3	Ozone
OAL	Office of Administrative Law
OGV	Ocean Going Vessels
OPP	Official Policy/Procedure
PAHs	polycyclic aromatic hydrocarbons
PCBs	polychlorinated biphenyls
PFC	Perfluorocarbons
PFAS	Polyfluorinated Substances
PHL	Pacific Harbor Line
pLAn	City of Los Angeles Sustainable City pLAn
PM	Particulate matter
$PM_{2.5}$	Particulate matter less than 2.5 microns in diameter
PM_{10}	Particulate matter less than 10 microns in diameter
PMP	Port Master Plan
POLA or Port	Port of Los Angeles
PPM	Parts per million
PPB	Parts per billion
PRC	Public Resources Code
Proposed Project	SA Recycling Amendment to Permit No. 750 Project

PSU	practical salinity unit
RAP	Remedial Action Plan
RCRA	Resource Conservation and Recovery Act
RPO	Renewable Portfolio Standard
RTO	regenerative thermal oxidizer
RSL	Regional Screening Level
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coast Information Center
SEIR	Subsequent Environmental Impact Report
SCAG	Southern California Association of Governments
SCG	Sustainable Construction Guidelines
SCH	State Clearinghouse
SF_6	Sulfur hexafluoride
SIP	State Implementation Plan
SLCP	Short-lived climate pollutants
SLR	Sea Level Rise
SO_2	Sulfur dioxide
So_x	Sulfur oxides
SPCC	Spill Prevention, Control and Countermeasure Plan
SRA	Source reception area
SVOC	Semi-volatile organic compound
SWRCB	State Water Resources Control Board
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
TCR	The Climate Registry
TCR	Tribal Cultural Resources
TDS	Total dissolved solids
TSCA	Toxic Substances Control Act
TMDL	Total Maximum Daily Load
USEPA	United State Environmental Protection Agency
VOC	Volatile Organic Compound
µg/L	Micrograms per liter
VSRP	Vessel Speed Reduction Program
WDRs	Waste Discharge Requirements
ZEV	Zero emission vehicles/
ZIMAS	Zoning Information and Map Access System