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Chapter 4 Cumulative Analysis

3 4.1 Introduction

4 This chapter presents CEQA and NEPA requirements for a cumulative impact analysis
5 and analyzes the potential for the Proposed Project or an alternative to contribute to a
6 cumulatively considerable effect when its impacts are combined with those of other past,
7 present, and reasonably foreseeable future projects. Following the presentation of the
8 requirements related to the cumulative impact analyses and a description of the related
9 projects (Sections 4.1.1 and 4.1.2, respectively), the analysis in Section 4.2 addresses
10 each of the resource areas for which the Initial Study/Notice of Preparation (IS/NOP)
11 concluded that the Proposed Project or an alternative may make a cumulatively
12 considerable contribution to a significant cumulative impact when combined with
13 impacts from other reasonably foreseeable projects in the area.

14 4.1.1 Requirements for Cumulative Impact Analysis

15 NEPA (40 CFR Section 1508.7 and 40 CFR Section 1508.25(a)(2)) and the State CEQA
16 Guidelines (14 California Code of Regulations [CCR] 15130) require a reasonable
17 analysis of the cumulatively considerable impacts of a proposed project. Cumulative
18 impacts are defined by CEQA as “two or more individual effects which, when considered
19 together, are considerable or which compound or increase other environmental impacts”
20 (State CEQA Guidelines Section 15355).

21 Cumulative impacts are further described as follows:

22 The individual effects may be changes resulting from a single project or a
23 number of separate projects.

24 The cumulative impacts from several projects are the changes in the
25 environment, which results from the incremental impact of the project when
26 added to other closely related past, present, and reasonably foreseeable future
27 projects. Cumulative impacts can result from individually minor but collectively
28 significant projects taking place over a period of time (40 CFR Section 1508.7
29 and State CEQA Guidelines, Section 15355(b)).

30 Furthermore, according to State CEQA Guidelines Section 15130(a)(1):

31 *As defined in Section 15355, a “cumulative impact” consists of an impact that is created as a*
32 *result of the combination of the project evaluated in the EIR together with other projects*
33 *causing related impacts. An EIR should not discuss impacts which do not result in part from*
34 *the project evaluated in the EIR.*

35

1 In addition, as stated in the State CEQA Guidelines, Section 15064(i)(5):

2 *The mere existence of significant cumulative impacts caused by other projects alone shall not*
 3 *constitute substantial evidence that the proposed project's incremental effects are*
 4 *cumulatively considerable.*

5 NEPA also requires analysis of cumulative impacts; 40 CFR Section 1508.7 states:

6 *Cumulative impact is the impact on the environment which results from the incremental*
 7 *impact of the action when added to other past, present, and reasonably foreseeable future*
 8 *actions regardless of what agency (Federal or non-Federal) or person undertakes such other*
 9 *actions. Cumulative impacts can result from individually minor but collectively significant*
 10 *actions taking place over a period of time.*

11 USACE, as part of its cumulative impact analysis, identifies the area(s) in which the
 12 effects of the proposed action will be felt; effects that are expected in that area from the
 13 proposed action; other actions -- past, present, and reasonably foreseeable (future) -- that
 14 are expected to have impacts in the same area; impacts or expected impacts from those
 15 other actions; and the overall impact expected if the individual impacts are allowed to
 16 accumulate (*Fritiofson v. Alexander*, 772 F.2d 1225, 1245 [5th Cir. 1985])¹.

17 Therefore, the following cumulative impact analysis focuses on whether the impacts of
 18 the Proposed Project or alternatives make a cumulatively considerable contribution to a
 19 significant cumulative impact within the context of impacts caused by other past, present,
 20 or future projects. The cumulative impact scenario considers other projects proposed
 21 within the area defined for each resource that would have the potential to contribute to
 22 significant impacts cumulative.

23 4.1.2 Projects Considered in the Cumulative Analysis

24 A total of 42 recent, current, or reasonably foreseeable future projects (approved or
 25 proposed) were identified within the general vicinity of the Proposed Project that could
 26 contribute to cumulative impacts. The locations of most of those projects are shown in
 27 Figure 4-1 with project summaries to follow in Table 4-1 (some projects are located
 28 beyond the boundaries of the map, others have no specific geographic location, and
 29 missing numbers in Table 4-1 are projects unrelated to the Proposed Project).

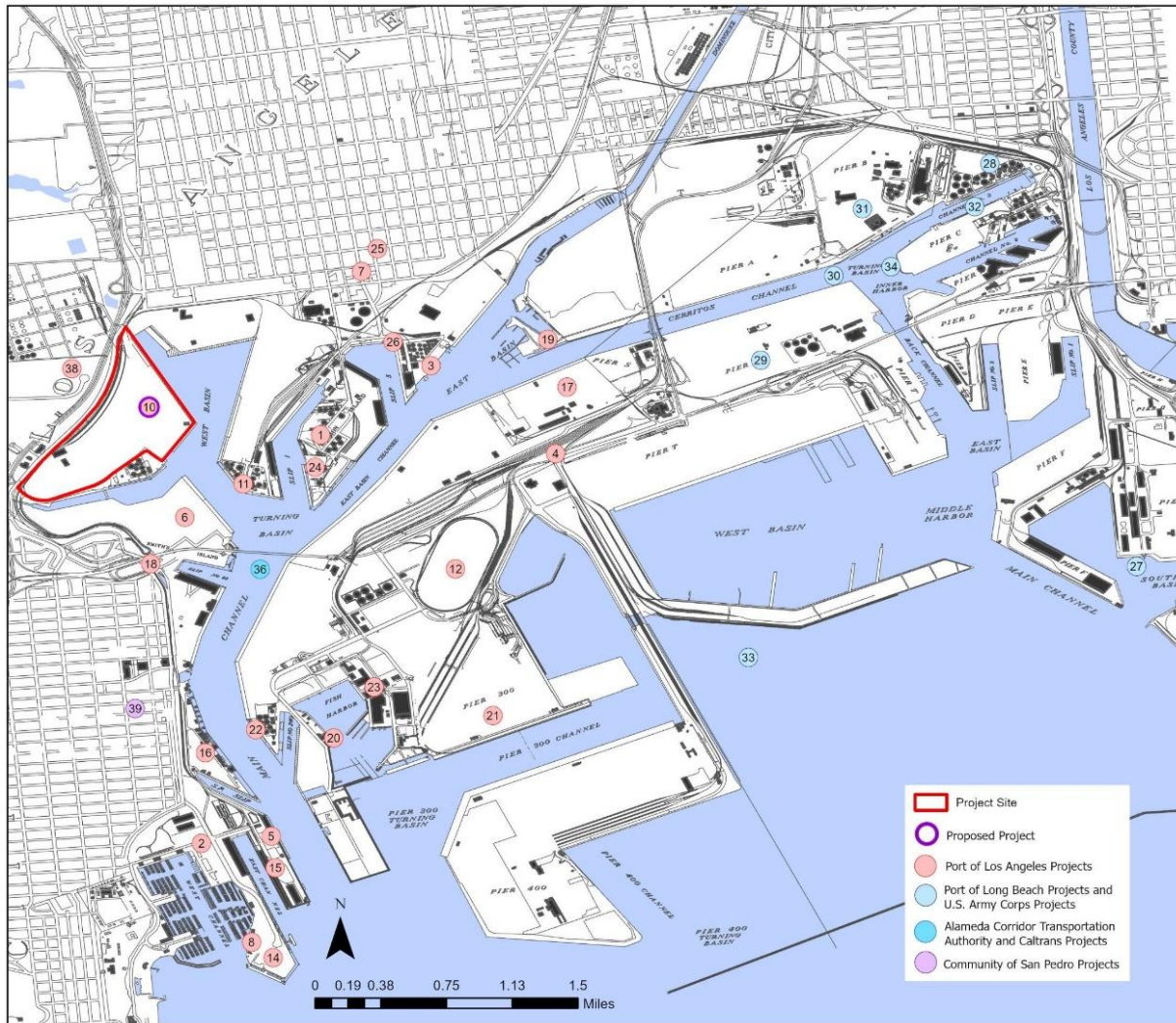
30 The list does not include numerous small and medium-sized residential and commercial
 31 developments in the general vicinity of the project site (i.e., San Pedro, Wilmington,
 32 Harbor City, Carson, and Long Beach). Those projects are assumed to be included in the
 33 population and activity projections produced by the Southern California Association of
 34 Governments (SCAG) and other planning entities and used in the South Coast Air
 35 Quality Management District (SCAQMD) and Los Angeles Department of
 36 Transportation (LADOT) analyses on which this cumulative analysis is based, and thus
 37 do not need to be considered separately.

38 For the purposes of this Draft EIR, the Project vicinity is defined as the area over which
 39 effects of the Proposed Project or an alternative could considerably contribute to

¹ As noted in the draft Environmental Impact Statement (EIS), NEPA was amended substantially by the 2023 Fiscal Responsibility Act (FRA). Under the FRA, federal agencies are directed to identify and evaluate reasonably foreseeable impacts, rather than direct, indirect, and cumulative impacts (which include past, present, and reasonably foreseeable impacts). Because the Notice of Intent to prepare the EIS for the Berths 121-131 Container Terminal Redevelopment Project was published in the Federal Register in 2014 (after an application for a Department of the Army permit was submitted for this terminal's water-associated activities), consistent with Part IV (Effective Date) of the FRA, USACE is using the NEPA regulations in place at that time.

1 cumulative effects. The cumulative regions of influence for individual resources are
 2 documented further in each of the resource-specific subsections in Section 4.2.

3 **Figure 4-1. Locations of Related and Cumulative Projects**



4

1 **Table 4-1. Related and Cumulative Projects**

No. in Figure	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 proposed 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.	Initial Study (IS)/Mitigated Negative Declaration (MND) approved September 2021. Project is in design and construction is anticipated in 2028.
2	Cabrillo Way Marina Project	The proposed Project includes developing, operating, and maintaining a marina, hotels, boater and visitor-serving club and meeting facilities, restaurants, retail buildings, and commercial areas at 2293 Miner Street. This project was evaluated in the West Channel/Cabrillo Marina Phase II Development Project (Cabrillo Way Marina) Final Supplemental Environmental Impact Report certified in December 2003.	Environmental review in process.
3	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.	Final Environmental Impact Report (FEIR) certified March 2025. Construction pending.
4	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 I-710 and I-110, adding a new auxiliary lane and a new collector-distributor road, and implementing traffic channelization improvements.	Draft IS/MND released Oct 2024. Project is in design.
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. Remedial action plan under development with LARWQCB.
6	Berths 97–109, China Shipping Development	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. Revised SEIR in preparation.
7	Wilmington Waterfront Master Plan (Avalon Boulevard Corridor Project)	Planned development intended to provide waterfront access and promote 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.	Waterfront promenade completed in 2025. Next phase of construction on the Avalon Pedestrian Bridge and Promenade Gateway is anticipated in 2025-2028.
8	Berth 44 Boatyard Project	The proposed 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.	NOP/IS released in January 2024. EIR in preparation.

No. in Figure	Project Title and Location	Project Description	Project Status
10	Berths 121-131 Container Terminal Improvements Project (Proposed 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. EIS/EIR in preparation. This is the Proposed Project.
11	Berths 148-151 (Phillips 66) Marine Oil Terminal Improvement Project	Various wharf and seismic ground improvements are required in order to comply with MOTEMS and a new 20-year entitlement with two additional 10-year options.	NOP/IS released February 2023. EIR in preparation. Project is in design.
12	Terminal Island Maritime Support Facility	Development and operation of a maritime support facility on an approximately 80-acre LAXT loop site on Terminal Island.	NOP/IS released in December 2023. EIR in preparation. Project is in design.
13	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 five years).	Continuous, but intermittent on average every 3–5 years.
14	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. Project is in design with construction anticipated in 2026-2028.
15	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.
16	West Harbor Modification Project (formerly San Pedro Public Market)	This project includes redevelopment of the 30-acres, formerly known as the Ports O’ Call Village, with up to 300,000 square feet of visitor-serving commercial uses and up to a 75,000 square feet conference center. This project would involve changing the industrial uses along Harbor Boulevard to commercial. This project also includes a waterfront promenade and 3 acres of open space. As revised by the EIR Addenda, the project includes development of an 108,000 square foot outdoor amphitheater, a 2.5-acre entertainment venue with a 100-foot diameter Ferris wheel and an approximately 150-foot tall by 50-foot-wide tower attraction tower, and other visitor-serving commercial uses.	Construction of promenade, town square, floating docks, and landscape/hardscape improvements completed. Construction of restaurant buildings to be completed in 2025. Draft Subsequent EIR released November 2024 for new phases of development. Conceptual planning and design in progress by private developer.
17	SA Recycling Amendment to Permit No. 750 Project	The proposed project is located at 901 New Dock Street on Terminal Island, 90731. 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.	Final Subsequent Environmental Impact Report (FSEIR) approved by the BOHC in April 2024. Project is in operation.

No. in Figure	Project Title and Location	Project Description	Project Status
18	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.	Project is under construction through 2026.
19	Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility	The proposed project includes development of an approximately 20 acre site at 1440 Anchorage Road for a goods movement workforce training facility.	NOP/IS released in February 2024. EIR in preparation. Project is in design with construction anticipated in 2027-2029.
20	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.
21	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.
22	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 anticipated in 2025-2027.
23	Star-Kist Cannery Facility	Demolition of 14-acre site for future use as cargo support or container chassis storage.	Construction anticipated in 2025-2026.
24	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 anticipated through 2026.
25	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 pending.
26	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.	NOP/IS issued July 2022. EIR in preparation. Project is in design.

No. in Figure	Project Title and Location	Project Description	Project Status
Port of Long Beach Projects			
27	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.
28	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 underway through 2032.
29	Pier S Battery Energy Storage System Project	Construction and operation of a 70-megawatt (MW) battery energy storage system (BESS) on approximately 2.9 acres of the existing, privately-owned power generation site on Pier S.,	Draft IS/MND released December 2024.
30	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.
31	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.	Project construction completed and in operation.
32	World Oil Tank Installation Project	Installation and operation of two 25,000-barrel petroleum storage tanks.	FEIR certified September 2024. Construction pending.
33	Pier Wind	Development of a 400-acre terminal to construct and assemble large offshore floating wind turbines and a 30-acre transport corridor to transport turbines for offshore wind projects in Northern and Central California coastal waters. The project will construct new land at the port and dredge approximately 50 million cubic yards for wharf construction, sinking basin, wet storage areas, and concrete piers adjacent to the transportation corridor.	NOP/IS issued January 2024. DEIR in preparation
Army Corps of Engineers			
34	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 released 2022.
Alameda Corridor Transportation Authority and Caltrans Projects			
36	SR-47 Vincent Thomas Bridge Deck Replacement Project	Bridge repairs including replacement of bridge deck, median concrete barrier and guardrails, and upgrading of seismic sensors.	Construction anticipated in 2026-2028.

No. in Figure	Project Title and Location	Project Description	Project Status
ICTF Joint Powers Authority (north of Figure 4-1)			
Community of San Pedro Projects			
38	John S. Gibson Truck and Chassis Parking Lot Project	Develop the 1599 John S. Gibson Boulevard 18.63-acre site with a short-term truck and chassis parking facility and related site improvements. The site is anticipated to be utilized for short-term parking, as chassis with or without containers are not anticipated to be parked onsite over 24 hours. It includes paving of the site and striping of approximately 393 truck and chassis stalls. The Project would be implemented in one development phase and would require a Port Master Plan Amendment.	IS/NOP was released in October 2023. DEIR released November 2024.
39	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.

1

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 impacts of past, present, and reasonably foreseeable future projects refers to the list of projects and reference numbers as shown in Table 4-1. The alternatives listed below are analyzed under CEQA relative to the related projects.

- Alternative 1 – No Project
- Alternative 2 – No Federal Action.

The cumulative impact analysis considers the resources that are analyzed in Chapter 3 of the Draft EIR. Accordingly, those issues are further evaluated in this cumulative impact analysis. The resource issues that the NOP/IS eliminated from further analysis in the EIS/EIR on the basis that impacts in one or more of the CEQA Appendix G issues would be less than significant are considered in Section 4.2.15 of this analysis of cumulative impacts.

4.2.1 Aesthetics and Visual Resources

4.2.1.1 Scope of Analysis

The geographic scope of analysis for cumulative impacts on aesthetics and visual resources to which the Proposed Project or an alternative may contribute is the set of viewing areas from which the Proposed Project has the potential to be seen, either as part of a single view or a series of related views (i.e., a scenic route). Outside of this set of points, the Proposed Project would not be within public views and therefore would not have the potential to contribute to cumulative aesthetic and visual resource impacts.

Past, present, planned, and reasonably foreseeable future development that could contribute to cumulative impacts on aesthetics and visual resources are those that have involved, or would involve, grading, paving, landscaping, construction of roads, buildings, and other working port facilities, as well as the presence and operation of equipment, such as gantry cranes, rail and trucking facilities, and backland storage sites. Views may also be affected by in-water and over-water activities such as dredging, filling, wharf demolition and construction, and container ship traffic.

The significance criteria used for the cumulative analysis are the same as those used for the Proposed Project in Section 3.1.4.2. Note that the criteria for AES-1, AES-2, AES-3, and AES-4 apply only to the CEQA analyses, while the criterion for AES-5 applies only to the NEPA analysis.

Cumulative Impact AES-1: Would the Proposed Project or alternatives contribute to a cumulatively considerable adverse effect on a scenic vista?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Scenic views that encompass the project site and its vicinity are primarily available from the higher elevations to the west in San Pedro and the Palos Verdes Peninsula. Views from these locations encompass the Port Complex as well as intervening development.

1 From higher elevations, including the Vincent Thomas Bridge, the views include the
2 industrial and residential areas surrounding the Port Complex, distant mountains (on clear
3 days), the ocean, and the horizon.

4 The visual changes that would be brought about by the Proposed Project would take place
5 in the distinctive landscape region created by the Port Complex, which collectively
6 constitutes one of the largest port complexes in the world. In this area, the construction of
7 breakwaters, the dredging of channels, filling for creation of berths and terminals, and
8 construction of the infrastructure required to support Port operations over the course of
9 the past century have completely transformed the original natural setting to create a
10 landscape that is highly engineered, nearly entirely altered, and visually dominated by
11 large-scale man-made features.

12 Past, present, and future projects at the Port have contributed and will continue to
13 contribute to this heavily altered and man-made view of a working port. Past
14 development associated with container terminal projects have increased the concentration
15 of large-scale development (due to the size and number of cranes and vessels calling at
16 the berths) within the Port. As a result, the existing visual quality from many of the scenic
17 points with views into the Port is low to moderately low due to the prominent visibility of
18 intensive shipping and industrial operations. There are specific sites that provide higher
19 quality views, such as of open water, the horizon and Pacific Ocean, or other features of
20 interest.

21 The space within the Port has already been graded and developed. Therefore, present and
22 reasonably foreseeable future projects visible at the Port would generally be built on
23 previously developed land within the existing Port boundaries, would be consistent with
24 the existing operations and uses, and would not need to be integrated into the aesthetics
25 of the site through special design techniques. As presented in Table 4-1, the cumulative
26 related projects identified within the Port consist primarily of redevelopment or
27 expansion projects, including container terminal and wharf improvements, construction
28 of new facilities, and roadway modifications. As a result, these cumulative projects
29 would result in construction of features that would be similar to existing development and
30 would not contrast with existing visual conditions from scenic viewpoints. Further, while
31 the present and reasonably foreseeable future projects would increase the level of
32 development visible from the scenic viewpoints, they would not obstruct available views
33 of the working port and horizon beyond. Therefore, given the existing working port
34 setting, the cumulative impacts of past, present, and reasonably foreseeable future
35 projects combined would not result in a significant impact under CEQA.

36 **Contribution of the Proposed Project**

37 The Proposed Project would add new, substantially larger wharf and railyard cranes to
38 the Berths 121-131 Terminal (see Section 2.6 for a detailed description); however, this
39 action would not remove or demolish any features that substantially contribute to the
40 scenic value of the area. As discussed in detail in Section 3.1.4.2, the project site is within
41 a highly industrialized area of the Port, and views from the surrounding viewpoints,
42 including scenic routes and scenic vantage points, are often fleeting, distant, and/or
43 obstructed by intervening topography and development. Further, the new cranes would be
44 consistent with the existing features of the Port landscape, which is dominated by large
45 container cranes, and would not contrast with the surrounding viewscape. The overall
46 effect of the Proposed Project would be to increase the size of container ships that could
47 dock at the Berths 121-131 Terminal and add to the complex scene in the middle ground
48 of most views. Although taller, the new cranes would be very similar in design to the

1 existing cranes and consistent in scale with other elements of the view. The Proposed
2 Project would be visually compatible with the overall character of the view as a working
3 port environment. Furthermore, the new cranes and berthed vessels would not result in
4 blockages of views of the Vincent Thomas Bridge from sensitive viewing areas.

5 Given these factors, the Proposed Project would not substantially alter or interfere with
6 the public's visual access to existing views (would not interrupt or block the view) and,
7 consequently, would cause no significant impact under AES-1. Therefore, the Proposed
8 Project would not make a cumulatively considerable contribution to a significant
9 cumulative impact related to scenic vistas under CEQA.

10 **Contribution of the Alternatives**

11 For the same reasons described above for the Proposed Project, Alternatives 1 and 2
12 would not make a cumulatively considerable contribution to a significant cumulative
13 impact under CEQA related to scenic vistas.

14 **Mitigation Measures and Residual Cumulative Impacts**

15 Neither the Proposed Project nor any alternative would make a cumulatively considerable
16 contribution to a significant cumulative impact under CEQA. Therefore, no mitigation
17 measures would be required.

18 **Cumulative Impact AES-2: Would the Proposed Project or 19 alternatives contribute to cumulatively considerable damage to 20 scenic resources, including, but not limited to, trees, rock 21 outcroppings, and historic buildings within a state scenic highway?**

22 **Impacts of Past, Present, and Reasonably Foreseeable Future 23 Projects**

24 There are no designated or eligible state scenic highways within the Port area; however,
25 the City of Los Angeles has City-designated scenic highways for local planning and
26 development decisions and considerations. As discussed in Section 3.1.4.2, John S.
27 Gibson Boulevard, Pacific Avenue, and Front Street are City-designated scenic routes
28 because they afford views of the Port and the Vincent Thomas Bridge.

29 The views from John S. Gibson Boulevard and Front Street towards the proposed project
30 area are of a busy working port and transportation infrastructure. The features of these
31 views from the local scenic highways in the project area that are most vivid are
32 undoubtedly the existing tall cranes, container-laden ships at container terminals such as
33 the Berths 226-236 (Everport) Container Terminal, the Berths 136-147 (Trapac) Marine
34 Terminal, and the Berths 97-109 China Shipping Development Project, as well as
35 container terminals on Pier 300 and Pier 400 and the partial, oblique-view glimpses of the
36 towers and suspension cables of the Vincent Thomas Bridge.

37 The Vincent Thomas Bridge is an important landmark in the region, and its visual
38 importance has been recognized by the City of Los Angeles and by the installation of
39 distinctive lighting to outline the bridge's nighttime profile. Past Port projects in the
40 vicinity of the Proposed Project have had the effect of degrading important views toward
41 the Vincent Thomas Bridge, but none of the current or reasonably foreseeable related
42 projects would have a material effect on the views of the working Port and Vincent
43 Thomas Bridge afforded from the locally designated scenic highway. In any case, as
44 discussed in Cumulative Impact AES-1, the present and reasonably foreseeable future

1 projects would be within an urbanized area that has already been graded and developed,
2 and would result in construction of features that would be similar to existing
3 development. Therefore, the cumulative impacts of past, present, and reasonably
4 foreseeable future projects would not be significant under CEQA.

5 Other viewpoints that afford views of the Proposed Project include residential areas of
6 San Pedro, South Beacon Street, the edge of the bluff in San Pedro Plaza Park, Friendship
7 Park, and fleeting views available to motorists traveling on the Vincent Thomas Bridge.
8 These locations offer panoramic views of the San Pedro waterfront, working Port, and
9 ocean beyond (as described in detail in Section 3.4, the prominence of each feature varies
10 by location depending on elevation and distance). As discussed in Cumulative Impact
11 AES-1, the present and reasonably foreseeable future projects visible at the Port would be
12 within an industrial area that has already been developed and would construct features
13 that would be similar to existing development. Additionally, the past, present, and
14 reasonably foreseeable future related projects would not obstruct available views of the
15 working port and horizon beyond. Therefore, the cumulative impacts of the related
16 projects would not result in a significant impact under CEQA.

17 **Contribution of the Proposed Project**

18 The Proposed Project's impact on views from locally designated scenic highways is
19 discussed in detail in Section 3.1.4.2 under Impact AES-2. As determined in that analysis,
20 the Proposed Project would not obstruct or detract from views available from the scenic
21 routes, as the visual changes would be consistent with the overall Port setting of the
22 Proposed Project and would not substantially change the views of the proposed project
23 area or block scenic resources. There would be no project-specific impact and thus the
24 Proposed Project would not make a cumulatively considerable contribution to a
25 significant cumulative impact related to scenic resources.

26 **Contribution of the Alternatives**

27 The No Project Alternative (Alternative 1) would not alter the existing view in any way,
28 as no features would be constructed and future operations would be very similar to
29 existing operations. For the same reasons described for the Proposed Project, the No
30 Federal Action Alternative (Alternative 2), which would add rail-mounted cranes to the
31 existing railyard in the Berths 121-131 Terminal, would not make a cumulatively
32 considerable contribution to a significant cumulative impact related to scenic resources.

33 **Mitigation Measures and Residual Cumulative Impacts**

34 Neither the Proposed Project nor any alternative would make a cumulatively considerable
35 contribution to a significant cumulative impact under CEQA. Therefore, no mitigation
36 measures would be required.

37 **Cumulative Impact AES-3: In an urbanized area, would the Proposed 38 Project or alternatives contribute to cumulatively considerable 39 conflicts with applicable zoning and other regulations governing 40 scenic quality?**

41 **Impacts of Past, Present, and Reasonably Foreseeable Future 42 Projects**

43 The related projects in the two San Pedro Bay ports, as recent or current developments in
44 areas zoned for industrial uses, conform to all applicable zoning and codes related to

1 scenic quality. Similarly, the developments in the vicinity of the ports, including
2 industrial, commercial, infrastructure, and residential projects, can be assumed to comply
3 with applicable zoning and other regulations. Accordingly, the related projects do not
4 represent or contribute to a significant cumulative impact.

5 **Contribution of the Proposed Project**

6 The Berths 121-131 terminal and surrounding facilities are comprised of industrial uses,
7 and the Proposed Project elements would be consistent with those uses. Accordingly, the
8 Proposed Project would not make a considerable contribution to a cumulatively
9 considerable impact under CEQA.

10 **Contribution of the Alternatives**

11 For the same reasons as described for the Proposed Project, Alternative 2 would not make
12 a cumulatively considerable contribution to a significant cumulative impact under CEQA
13 related to zoning and other applicable regulations. Because Alternative 1 would not
14 change the existing scenic quality, it would not make a cumulatively considerable
15 contribution to a significant cumulative impact under CEQA.

16 **Mitigation Measures and Residual Cumulative Impacts**

17 Neither the Proposed Project nor any alternative would make a cumulatively considerable
18 contribution to a significant cumulative impact under CEQA. Therefore, no mitigation
19 measures would be required.

20 **Cumulative Impact AES- 4: Would the Proposed Project or** 21 **alternatives make a cumulatively considerable contribution to a** 22 **significant cumulative impact due to creating a new source of** 23 **substantial light or glare that would adversely affect day or nighttime** 24 **views in the area?**

25 **Impacts of Past, Present, and Reasonably Foreseeable Future** 26 **Projects**

27 The Port is a highly urbanized area with a substantial amount of existing nighttime
28 illumination. The major sources of illumination at the Port are the hundreds of down-
29 lights and floodlights attached to the tops of the tall light standards and street and
30 roadway lighting. Other sources include high-intensity boom lights on top of cranes and
31 floodlights attached to the bottom and sides of the cranes that illuminate the cranes, the
32 vessels, and the immediately surrounding area during loading or unloading of vessels.
33 Past projects at the Port have contributed to an increase in ambient illumination levels in
34 nearby areas. Development in the vicinity of the Port has created an urbanized landscape
35 characterized by high levels of nighttime lighting from streetlights, area lighting, security
36 lighting, and industrial safety illumination. Thus, the net effect of the past projects has
37 been to create a significant cumulative impact. However, because of new lighting
38 standards that the Port and other jurisdictions are now implementing to minimize the
39 lighting impacts of new projects, the contributions of present and future projects to
40 cumulative lighting impacts in the area will be limited.

41 **Contribution of the Proposed Project**

42 As documented in the analysis in Section 3.1.4.2 under AES-4, the incremental change in
43 ambient lighting conditions associated with the Proposed Project as a result of up to ten

1 additional wharf cranes and four RMG cranes would not create a substantial change in
2 existing levels of ambient light in sensitive areas in the proposed project vicinity.
3 Additionally, the lighting has been designed to minimize off-site light spill, and because
4 of the distance of the light fixtures from areas of potential sensitivity, the proposed
5 lighting would not adversely affect nearby light-sensitive areas.

6 Much of the area near the project site consists of lands used for Port activities that are
7 intensively illuminated. Accordingly, in most areas near the Proposed Project and on the
8 streets that serve them, the level of sensitivity to Project-related changes in nighttime
9 lighting conditions is low. Furthermore, lighting design measures would minimize
10 potential impacts of the Proposed Project; therefore, the Proposed Project would not
11 make a cumulatively considerable contribution to a significant cumulative impact under
12 CEQA.

13 **Contribution of the Alternatives**

14 No new lighting would be implemented under Alternative 1; accordingly, Alternative 1
15 would not contribute to a cumulatively significant impact related to light and glare under
16 CEQA. Alternative 2 would only add lights on the new RMG cranes, which would not
17 introduce a substantial new source of light or glare, given the overall light regime of the
18 Port, and would not be visible from key viewpoints. Accordingly, Alternative 2 would
19 not make a cumulatively considerable contribution to a significant light and glare impact
20 under CEQA.

21 **Mitigation Measures and Residual Cumulative Impacts**

22 Neither the Proposed Project nor any alternative would make a cumulatively considerable
23 and contribution to a significant cumulative impact under CEQA. Therefore, no
24 mitigation is required.

25 **Cumulative Impact AES-5: Would the Proposed Project or** 26 **alternatives contribute to negative changes to the overall visual** 27 **character and quality of a landscape that have a cumulatively** 28 **considerable effect on viewer response?**

29 **Impacts of Past, Present, and Reasonably Foreseeable Future** 30 **Projects**

31 As described under Cumulative Impact AES-1, past and present projects at the Port and
32 in the surrounding region have altered the character and quality of the views from many
33 of the viewpoints used as the basis for this analysis, and future projects have the potential
34 to bring about further changes to these views.

35 The views that were analyzed for the Proposed Project include local scenic routes (Front
36 Street, John S. Gibson Boulevard, Pacific Avenue, and the Vincent Thomas Bridge) and
37 key viewpoints. As described in detail in Section 3.1.5.2, views from these locations
38 include the busy working Port, the San Pedro waterfront, neighborhoods in San Pedro
39 and Wilmington, and the ocean to varying degrees, depending on elevation and distance.

40 As discussed in AES-1, the area within the Port has already been graded and developed,
41 which constitutes the baseline conditions. Present and reasonably foreseeable future
42 projects at the Port would generally be built on previously developed land and include
43 features that would be similar to existing development and thus the overall visual quality
44 of the area. Additionally, the present and reasonably foreseeable future related projects

1 would not obstruct available views of the working port and horizon beyond from the
2 analyzed viewpoints. Therefore, given the existing working port setting, the cumulative
3 impacts of past, present, and reasonably foreseeable future projects combined would not
4 result in a significant cumulative impact under NEPA.

5 **Contribution of the Proposed Project**

6 As discussed under Cumulative Impact AES-1, the visual changes associated with the
7 Proposed Project would be consistent with the character of the existing views from each
8 of the viewpoints described in Figure 3.1-1 and analyzed in Section 3.1.3.3. The Project
9 site is within a highly industrialized area within the Port, and views of the site from
10 surrounding locations, including scenic routes and key viewpoints, are often fleeting,
11 distant, and/or obstructed by intervening topography and development. The overall effect
12 of the Proposed Project would be to increase the level of development of the existing
13 Berths 121-131 Terminal and the West Basin area. The development would support
14 similar activities that are currently occurring at the Project site and would form a part of
15 the complex scene in the middle ground zone of most views. The development would be
16 visually compatible with the overall character of the view as a working port environment.
17 Furthermore, views of the Vincent Thomas Bridge from sensitive viewing areas would
18 not be obstructed.

19 Accordingly, the Proposed Project would not contribute to negative changes to the
20 overall visual character and quality of a landscape and would not make a cumulatively
21 considerable contribution to a significant cumulative impact on viewer response under
22 NEPA.

23 **Contribution of the Alternatives**

24 For the same reasons as discussed for the Proposed Project, Alternative 2 would not make
25 a cumulatively considerable contribution to a significant cumulative impact to scenic
26 resources under NEPA. Alternative 1 is not required to be analyzed under NEPA.

27 **Mitigation Measures and Residual Cumulative Impacts**

28 Neither the Proposed Project nor the No Federal Action Alternative would make a
29 cumulatively considerable contribution to a significant impact under NEPA. Therefore,
30 no mitigation measures would be required.

31 **4.2.2 Air Quality and Meteorology**

32 **4.2.2.1 Scope of Analysis**

33 The region of analysis for cumulative effects on regional air quality (Cumulative Impacts
34 AQ-1 and AQ-3 related to mass emissions) is the SCAB. For localized effects of air
35 quality (Cumulative Impacts AQ-2 and AQ-4 related to ambient pollutant
36 concentrations), the SCAQMD typically assesses cumulative projects within one mile of
37 a project site. For odors (Impact AQ-5), the cumulative analysis considers the immediate
38 vicinity of the Proposed Project. For health effects (Impact AQ-6), the area of influence
39 includes the cumulative projects within the Port complex and their effects on the
40 surrounding communities of San Pedro, Wilmington, and Long Beach.

4.2.2.2 Methodology for Cumulative Air Quality Impacts

Criteria Pollutants

As described in Section 3.2, 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 SCAQMD. This trend towards cleaner air has occurred despite continued population growth. However, stationary industrial and mobile emission sources and topographical/meteorological conditions that inhibit atmospheric dispersion combine to create adverse air pollution effects in the SCAB.

As discussed in Section 3.2.2.4 and shown in Table 3.2-2, the SCAB is an “extreme” nonattainment area for ozone (8-hour standard) and a nonattainment area for fine particulate matter (PM_{2.5}) (annual and 24-hour standard) in regard to the National Ambient Air Quality Standards (NAAQS). The SCAB is in attainment of the NAAQS for PM₁₀, carbon monoxide (CO), sulfur dioxide (SO₂), and nitrogen dioxide (NO₂). In regard to the California Ambient Air Quality Standards (CAAQS), the SCAB is presently in nonattainment for ozone, PM₁₀, PM_{2.5}, NO₂, and lead; is in attainment of the CAAQS for SO₂, CO, and sulfates; and is unclassified for hydrogen sulfide and visibility-reducing particles (CARB 2013). The 2016 AQMP predicted attainment of all NAAQS within the SCAB, including PM_{2.5} by 2025 and ozone by 2031 (SCAQMD 2016), but those predictions were speculative, and the 2022 AQMP moved the prediction for ozone to 2037 (SCAQMD 2022).

The contribution of the Proposed Project to cumulative impacts was assessed using SCAQMD’s guidance (SCAQMD 2003), which states that projects that exceed SCAQMD’s project-level significance thresholds are considered by SCAQMD to have cumulatively considerable impacts. Conversely, projects that do not exceed the project-level thresholds are generally not considered to have cumulatively considerable impacts. Significance thresholds are presented in Section 3.2.4.3. SCAQMD guidance does not distinguish between attainment and nonattainment pollutants, and this analysis assumes that exceedance of any project-level threshold would also constitute a cumulatively considerable impact. Cumulative Impacts AQ-5 and AQ-7 are addressed qualitatively, in accordance with SCAQMD’s qualitative threshold.

Toxic Air Contaminants

The results of SCAQMD’s MATES V study (SCAQMD 2021) showed a 57% 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. Nevertheless, the MATES V study showed that health risks from air toxics in the port area remain elevated above the risks in communities elsewhere in the Basin. In the Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach, CARB also identified elevated cancer risk due to operational emissions within and near the ports due to port-area sources (CARB 2006).

To reduce port-related cancer risks in nearby communities, the Ports of Los Angeles and Long Beach approved port-wide air pollution control measures through implementation of the CAAP, which had the goal of reducing diesel particulate matter (DPM) emissions by 85% (SPBP 2010). 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

1 and with other applicable regulations in order to allow the Port to meet long-term health
2 risk and emission reduction goals.

3 In addition, measures in the 2017 CAAP update include additional emissions reductions
4 associated with the five major port-related source categories: ocean-going vessels,
5 harborcraft, cargo-handling equipment, locomotives, and trucks. As reported in the Port's
6 2023 Emissions Inventory (LAHD 2024), progress on the CAAP measures has been
7 tracked since 2005. Due to the many emission reduction measures undertaken by the
8 Port, as well as statewide and federal regulations and standards, the 2023 emission
9 reduction standards were met for DPM, NO_x, and SO_x, despite the increase in cargo-
10 handling activity due to the 15% increase in cargo (as measured by TEUs) since 2005.
11 Specifically, the Port surpassed the 2023 DPM emission reduction standard (77%) with a
12 91% emission reduction in 2023. Progress on the CAAP health risk reduction was
13 determined by comparing the change in DPM mass emissions to the 2005 baseline. In
14 2023, with a 91% reduction, the Port met the 2020 Health Risk Reduction Standard
15 (85%).

16 The contribution of the Proposed Project to cumulative health risk impacts was, for the
17 most part, assessed using SCAQMD's guidance (SCAQMD 2003), which states that
18 exceedances of project-specific significance thresholds represent cumulatively
19 considerable impacts. Therefore, this analysis conservatively assumes that (for
20 Cumulative Impact AQ-6) any risk above the significance threshold would be a
21 cumulatively considerable impact.

22 **Cumulative Impact AQ-1: Would the Proposed Project or alternatives** 23 **result in construction-related emissions that would make a** 24 **cumulatively considerable contribution to a significant cumulative** 25 **impact from exceedance of the SCAQMD threshold of significance in** 26 **Table 3.2-8?**

27 **Impacts of Past, Present, and Reasonably Foreseeable Future** 28 **Projects**

29 The Proposed Project would be constructed over approximately 24-months, assumed to
30 be 2026-2027. Several large or moderate-sized construction projects could occur
31 concurrently at the Port and surrounding areas (see Table 4-1), including the Berths 191-
32 194 [Ecocem] Dry Bulk Facility Project (#3 on Figure 4-1), Avalon Boulevard Corridor
33 Project (#25), Outer Harbor Cruise Terminal and Outer Harbor Park (#14), SR-
34 47/Vincent Thomas Bridge & Front St./Harbor Blvd. Interchange Reconfiguration (#18),
35 Berths 302-306 [APL] Container Terminal Project (#21), Berths 238-239 [PBF Energy]
36 Marine Oil Terminal Improvement Project (#22), Piers G & J Terminal Redevelopment
37 Project (#27), and Pier B Rail Yard Expansion (#28). A number of smaller projects,
38 including residential and commercial projects in Carson and the San Pedro and
39 Wilmington communities, would also contribute air emissions during construction.

40 The construction impacts of the related projects would be cumulatively significant if their
41 combined construction emissions would exceed the SCAQMD daily emission thresholds
42 for construction. Because this would almost certainly be the case for most analyzed
43 criteria pollutants and precursors (PM₁₀, PM_{2.5}, nitrogen oxides [NO_x], CO, and volatile
44 organic compounds [VOCs]), the related projects are assumed to result in a significant
45 cumulative air quality impact for PM₁₀, PM_{2.5}, NO_x, CO and VOC. Construction
46 emissions of sulfur oxides (SO_x) are unlikely to exceed the thresholds due to stringent
47 sulfur fuel requirements and because project-level evaluations for other large Port

1 projects have estimated modeled SO_x levels to be below the SCAQMD daily SO_x
2 threshold.

3 **Contribution of the Proposed Project (Prior to Mitigation)**

4 Proposed Project emissions would exceed SCAQMD significance thresholds for NO_x in
5 both construction years under CEQA and NEPA and for CO under CEQA (Table 3.2-12).
6 For the period during which construction and operations would overlap (i.e., take place
7 concurrently), emissions would exceed SCAQMD significance thresholds for CO in 2027
8 under CEQA (Table 3.2-13). These impacts would combine with cumulatively significant
9 impacts from concurrent related construction projects. As a result, without mitigation,
10 Proposed Project construction emissions would make a cumulatively considerable
11 contribution to an existing significant cumulative impact for NO_x emissions under CEQA
12 and NEPA and for CO under CEQA.

13 **Contribution of the Alternatives**

14 Alternative 1 (No Project) would have no construction activities and would therefore not
15 make a cumulatively considerable contribution to a significant cumulative impact related
16 to construction emissions. Alternative 2 (No Federal Action) is identical to the NEPA
17 baseline and therefore has no impacts under NEPA.

18 Under CEQA, emissions from overlapping construction and operation of Alternative 2
19 would exceed SCAQMD significance thresholds for CO in both construction years
20 (Table 3.2-35). That impact would combine with impacts from concurrent related
21 construction projects, which would already be cumulatively considerable. As a result,
22 without mitigation, Alternative 2 construction and overlapping operational emissions
23 would make a cumulatively considerable contribution to a significant cumulative impact
24 for CO emissions under CEQA.

25 **Mitigation Measures and Residual Cumulative Impacts**

26 The Proposed Project would include seven mitigation measures (described in detail in
27 Section 3.2.4.7) for construction-related impacts: MM AQ-1 (Harbor Craft Used During
28 Construction), MM AQ-2 (On-road Trucks Used During Construction), MM AQ-3 (Non-
29 Road Construction Equipment), MM AQ-4 (Cargo Ships Used During Construction),
30 MM AQ-5 (Dredging Non-Road Equipment), MM AQ-6 (General Construction
31 Mitigation Measure, not quantified in this analysis), and MM AQ-7 (Renewable Diesel
32 Fuel). Three operational mitigation measures would also be applied: MM AQ-8 (Vessel
33 Speed Reduction Program), MM AQ-9 (Yard Tractor Emissions Standards), and MM
34 AQ-10 (Cargo-Handling Equipment Emissions Standards).

35 After mitigation, Proposed Project construction emissions would be reduced but would
36 continue to exceed SCAQMD significance thresholds for NO_x in 2026 and 2027 (Table
37 3.2-12). For the period of overlapping construction and operations, Proposed Project
38 emissions after mitigation would be reduced but would continue to exceed SCAQMD
39 significance thresholds for CO in 2027 (Table 3.2-13). These impacts would combine
40 with impacts from concurrent related construction projects, which would already be
41 cumulatively significant. Therefore, after mitigation, construction of the Proposed Project
42 would make a cumulatively considerable and unavoidable contribution to existing
43 significant cumulative impacts related to CO emissions under CEQA and to NO_x
44 emissions under NEPA.

1 Alternative 2 would include four construction mitigation measures, MM AQ-2, MM AQ-
2 3, MM AQ-6 (not quantified in this analysis), and MM AQ-7, and two operational
3 measures, MM AQ-9 and MM AQ-10 (MM AQ-1, MM AQ-4, MM AQ-5, and MM AQ-
4 8 apply to sources not employed for construction of the No Federal Action Alternative
5 and thus are not evaluated here). After mitigation, Alternative 2's overlapping
6 construction and operational emissions would be reduced but would continue to exceed
7 SCAQMD significance thresholds for CO (Table 3.2-35). These impacts would combine
8 with impacts from concurrent related construction projects, which would already be
9 cumulatively significant. Therefore, after mitigation, concurrent construction and
10 operation of Alternative 2 would make a cumulatively considerable and unavoidable
11 contribution to an existing significant cumulative impact of CO under CEQA.

12 **Cumulative Impact AQ-2: Would the Proposed Project or alternatives**
13 **construction result in off-site ambient air pollutant concentrations**
14 **that would make a cumulatively considerable contribution to a**
15 **significant cumulative impact from exceedance of a SCAQMD**
16 **threshold of significance in Table 3.2-9?**

17 **Impacts of Past, Present, and Reasonably Foreseeable Future**
18 **Projects**

19 As described in Cumulative Impact AQ-1, above, several large or moderate-sized
20 construction projects (Table 4-1) and a number of small projects in the Port and
21 surrounding areas could occur concurrently with construction of the Proposed Project.
22 The construction impacts of these related projects would be cumulatively significant if
23 their combined construction ambient pollutant concentrations would exceed the ambient
24 concentration thresholds for construction. Although there is no way to be certain if a
25 cumulative exceedance of the thresholds would happen for any pollutant without
26 performing dispersion modeling of the other projects, cumulative air quality impacts are
27 likely to exceed the thresholds for PM₁₀, and PM_{2.5}, and NO₂ and are unlikely to exceed
28 the thresholds for CO because the entire SCAB is in attainment for CO, and Project-level
29 evaluations for other large Port projects have estimated modeled CO levels below the CO
30 threshold, even at congested intersections. Consequently, construction of the related
31 projects are assumed to result in a significant cumulative air quality impact for PM₁₀,
32 PM_{2.5}, and NO₂ ambient pollutant concentrations.

33 **Contribution of the Proposed Project (Prior to Mitigation)**

34 Construction of the Proposed Project would result in maximum off-site emissions that
35 would exceed SCAQMD state ambient pollutant concentration thresholds for PM₁₀ (24-
36 hour and annual average) and PM_{2.5} (24-hour) in 2026; this would also be the case for the
37 period of overlapping construction and operation (Tables 3.2-14 through 3.2-17).
38 Overlapping construction and operation would also generate incremental concentrations
39 of NO₂ that would exceed federal and state standards in 2026. These impacts would
40 combine with the cumulatively significant impacts from concurrent related construction
41 projects. As a result, without mitigation, Proposed Project construction would make a
42 cumulatively considerable contribution to an existing significant cumulative impact
43 related to ambient NO₂, PM_{2.5} and PM₁₀ under CEQA and NEPA.

Contribution of the Alternatives

Alternative 1 would have no construction activities and would therefore not make a considerable contribution to an existing significant cumulative impact. Because Alternative 2 (No Federal Action) is identical to the NEPA baseline, there would be no impacts under NEPA.

Under CEQA, construction of Alternative 2, including overlapping construction and operational activities, would not result in maximum off-site concentrations of any criteria pollutant that would exceed SCAQMD thresholds (Table 3.2-36 through 3.2-39). Accordingly, even without mitigation, construction of Alternative 2 would not make a cumulatively considerable contribution to an existing significant cumulative impact related to off-site ambient concentrations under CEQA.

Mitigation Measures and Residual Cumulative Impacts

The Proposed Project would include construction mitigation measures MM AQ-1 through MM AQ-7 and operational measures MM AQ-8 through MM AQ-10, summarized under Cumulative Impact AQ-1, above, and described in detail in Section 3.2.4.7. Mitigation would reduce the Proposed Project's off-site ambient concentrations for PM₁₀ and PM_{2.5} below thresholds for both construction and for the period of overlapping construction and operation. Concentrations of NO₂, however, would continue to exceed the federal 1-hour average significance threshold. Therefore, after mitigation, construction of the Proposed Project and overlapping construction and operation would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact for NO₂ under CEQA and NEPA.

Alternative 1 would have no construction activities and would therefore not make a cumulatively considerable contribution to a significant cumulative impact. Because Alternative 2 would not make a cumulatively considerable and unavoidable contribution to a significant cumulative impact under CEQA, no mitigation is required.

Cumulative Impact AQ-3: Would operation of the Proposed Project or alternatives result in operational emissions that would make a cumulatively considerable contribution to a significant cumulative impact from exceedance of a SCAQMD threshold of significance in Table 3.2-10?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Operation of most of the past, present, and reasonably foreseeable projects in Table 4-1 would contribute to cumulatively considerable impacts by emitting criteria pollutants. The operational impacts of related projects would be cumulatively significant if their combined operational emissions would exceed the SCAQMD daily emission thresholds for operations. Because this almost certainly would be the case for most analyzed criteria pollutants and precursors, the related projects would result in a significant cumulative pollutant emissions impact for PM₁₀, PM_{2.5}, NO_x, CO, and VOC.

Contribution of the Proposed Project (Prior to Mitigation)

Proposed Project operational incremental emissions would exceed SCAQMD significance thresholds for VOCs, CO, and NO_x in at least one of the analyzed years under CEQA and NEPA (Table 3.2-22). These impacts would combine with impacts

1 from related projects; as a result, without mitigation, the Proposed Project's operational
2 emissions would make a cumulatively considerable contribution to an existing significant
3 cumulative impact for NO_x, CO, and VOC under CEQA and NEPA.

4 **Contribution of the Alternatives**

5 Alternative 1's operational emissions would exceed SCAQMD significance thresholds
6 for VOC and CO in at least one of the analyzed years under CEQA (Table 3.2-30). These
7 impacts would combine with impacts from concurrent related projects, which would
8 already be cumulatively significant. As a result, Alternative 1 impacts would make a
9 cumulatively considerable contribution to an existing significant cumulative impact for
10 VOC and CO under CEQA. NEPA does not require analysis of Alternative 1.

11 Alternative 2 operational emissions would exceed SCAQMD significance thresholds for
12 VOC and CO in at least one of the analyzed years under CEQA (Table 3.2-40). These
13 impacts would combine with impacts from concurrent related projects, which would
14 already be cumulatively significant. As a result, without mitigation, Alternative 2 would
15 make a cumulatively considerable contribution to a significant cumulative impact for CO
16 and NO_x under CEQA. Because Alternative 2 is identical to the NEPA baseline, there
17 would be no cumulative impact under NEPA.

18 **Mitigation Measures and Residual Cumulative Impacts**

19 Mitigation measures MM AQ-8 (Vessel Speed Reduction [VSR]), MM AQ-9 (Yard
20 Tractor Emissions Standards), and MM AQ-10 (Cargo-Handling Equipment Emissions
21 Standards) would be implemented for the Proposed Project (see Section 3.2.4.7).
22 Mitigation would reduce the emissions of Proposed Project operation. However, under
23 CEQA, NO_x would continue to exceed SCAQMD significance thresholds in 2026 under
24 CEQA and NEPA (Table 3.2-22). Therefore, after mitigation, the Proposed Project would
25 make a cumulatively considerable and unavoidable contribution to a significant
26 cumulative impact related to mass emissions of NO_x under CEQA and NEPA.

27 Mitigation cannot be implemented under Alternative 1 because there would be no
28 discretionary action under CEQA. Accordingly, Alternative 1 operational emissions
29 would continue to exceed SCAQMD significance thresholds for CO and NO_x, and
30 Alternative 1 would make a cumulatively considerable and unavoidable contribution to
31 an existing significant cumulative impact for CO and NO_x under CEQA. NEPA does not
32 require analysis of Alternative 1.

33 Mitigation measures MM AQ-8 through MM AQ-10 would be implemented for the No
34 Federal Action Alternative. With implementation of those measures, Alternative 2's
35 operational emissions would be reduced but would continue to exceed SCAQMD
36 significance thresholds for CO in 2026 and 2027 (Table 3.2-40). As a result, Alternative
37 2 would make a cumulatively considerable and unavoidable contribution to an existing
38 significant cumulative impact for CO under CEQA. Because Alternative 2 is identical to
39 the NEPA baseline, there would be no cumulative impact under NEPA.

40

1 **Cumulative Impact AQ-4: Would operation of the Proposed Project**
2 **or alternatives make a cumulatively considerable contribution to a**
3 **significant cumulative impact related to offsite ambient air pollutant**
4 **concentrations exceeding a SCAQMD threshold of significance?**

5 **Impacts of Past, Present, and Reasonably Foreseeable Future**
6 **Projects**

7 Operation of most of the related projects in Table 4-1 would contribute to cumulatively
8 considerable impacts. The operations impacts of related projects would be cumulatively
9 significant if their combined operations ambient pollutant concentrations would exceed
10 the ambient concentration thresholds for operations. Although there is no way to be
11 certain if a cumulative exceedance of the thresholds would happen for any pollutant
12 without performing dispersion modeling of the other projects, cumulative air quality
13 impacts are likely to exceed the thresholds for PM₁₀, PM_{2.5}, and NO₂, and, as explained
14 under Cumulative Impact AQ-2, are unlikely to exceed the thresholds for CO.
15 Consequently, operation of the related projects is assumed to result in a significant
16 cumulative air quality impact for PM₁₀, PM_{2.5}, and NO₂ ambient pollutant concentrations.

17 **Contribution of the Proposed Project (Prior to Mitigation)**

18 Operation of the Proposed Project would produce maximum off-site incremental PM₁₀
19 (24-hr and annual average) concentrations that would exceed SCAQMD thresholds in
20 2036 through 2062 (Table 3.2-25) and maximum off-site NO₂ (federal 1-hour average)
21 concentration from operational activities would exceed SCAQMD thresholds in 2050
22 through 2062 (Table 3.2-26). Accordingly, impacts would be significant under CEQA
23 and NEPA. These impacts would combine with impacts from concurrent related projects.
24 As a result, without mitigation, Proposed Project operations would make a cumulatively
25 considerable contribution to an existing significant cumulative impact related to ambient
26 offsite pollutant concentrations of PM₁₀ and NO₂.

27 **Contribution of the Alternatives**

28 Emissions from operation of Alternative 1 would result in off-site concentrations of PM₁₀
29 (24-hr and annual average) concentrations that would exceed SCAQMD thresholds in
30 2055 and 2062 that would exceed SCAQMD thresholds (Table 3.2-32). Accordingly,
31 Alternative 1 would make a cumulatively considerable contribution to a significant
32 cumulative impact under CEQA. NEPA does not require analysis of Alternative 1.

33 Emissions from Alternative 2 operations would result in maximum off-site incremental
34 PM₁₀ (24-hr and annual average) concentrations that would exceed SCAQMD thresholds
35 in analysis year 2062 (Tables 3.2-41 and 3.2-42). Accordingly, Alternative 2 would
36 make a cumulatively considerable contribution to a significant cumulative impact.
37 Because Alternative 2 is identical to the NEPA baseline, there would be no cumulative
38 impact under NEPA.

39 **Mitigation Measures and Residual Cumulative Impacts**

40 After implementation of mitigation measures MM AQ-8 through MM AQ-10 (see
41 Section 3.2.4.7), concentrations of PM₁₀ (24-hr and annual average) from Proposed
42 Project emissions would still exceed ambient pollutant concentration significance
43 thresholds under CEQA (Table 3.2-25). Accordingly, the Proposed Project would make a
44 cumulatively considerable contribution to a significant cumulative impact under CEQA.

1 Mitigation cannot be implemented under Alternative 1 because there would be no
2 discretionary action under CEQA. Accordingly, Alternative 1 operational emissions
3 would continue to exceed SCAQMD significance thresholds for PM₁₀, and Alternative 1
4 would make a cumulatively considerable and unavoidable contribution to an existing
5 significant cumulative impact under CEQA.

6 Mitigation would reduce Alternative 2's off-site ambient PM₁₀ concentrations to below
7 significance thresholds. Accordingly Alternative 2 would not make a cumulatively
8 considerable and unavoidable contribution to an existing significant cumulative impact
9 under CEQA. Because Alternative 2 is identical to the NEPA baseline, there would be no
10 cumulative impact under NEPA.

11 **Cumulative Impact AQ-5: Would operation of the Proposed Project**
12 **or alternatives make a cumulatively considerable contribution to a**
13 **significant cumulative impact create an objectionable odor at the**
14 **nearest sensitive receptor?**

15 **Impacts of Past, Present, and Reasonably Foreseeable Future**
16 **Projects**

17 There are numerous sources of odors within the vicinity of the Port, including stationary
18 industrial sources of various types and mobile sources such as trucks, trains, and ships.
19 Most of the related past, present, and reasonably foreseeable future projects in Table 4-1
20 either emit odors as part of normal operations (e.g., refineries and chemical plants) or rely
21 to some extent on the combustion of fossil fuels. Some individuals may find that diesel
22 combustion emission odors are objectionable in nature, although quantifying the odorous
23 impacts of these emissions on the public is difficult. Due to the mobile nature of many of
24 the emission sources and the distances from those sources to residents (sensitive
25 receptors), odorous emissions attributable to the related projects would be less than
26 cumulatively significant.

27 **Contribution of the Proposed Project**

28 Operation of the Proposed Project would increase diesel emissions within and near the
29 Port. The mobile nature of most project emission sources would serve to disperse
30 Proposed Project emissions. Additionally, the distance between Proposed Project
31 emission sources and the nearest residents is expected to be far enough to allow for
32 adequate dispersion of these emissions to below objectionable odor levels. As a result,
33 Proposed Project operations would not make a considerable contribution to a significant
34 cumulative odor impact under CEQA or NEPA.

35 **Contribution of the Alternatives**

36 For the same reasons described for the Proposed Project, Alternatives 1 and 2 would not
37 make a cumulatively considerable contribution to cumulative odor impacts under CEQA.
38 NEPA does not require analysis of Alternative 1. Because Alternative 2 is identical to the
39 NEPA baseline, there would be no impact under NEPA.

40 **Mitigation Measures and Residual Cumulative Impacts**

41 Mitigation is not required because the Proposed Project and alternatives would not make
42 a cumulatively considerable contribution to a significant cumulative odor impact.

1 **Cumulative Impact AQ-6: Would the Proposed Project or alternatives**
2 **would make a cumulatively considerable contribution to a significant**
3 **cumulative impact from exposure of receptors to significant levels of**
4 **toxic air contaminants?**

5 **Impacts of Past, Present, and Reasonably Foreseeable Future**
6 **Projects**

7 As estimated in a series of studies (e.g., the SCAQMD MATES studies published in 2015
8 and 2021 [SCAQMD 2015, 2021] and CARB’s Diesel Particulate Matter Exposure
9 Assessment Study for the Ports of Los Angeles and Long Beach [CARB 2006]), health
10 risks from air toxics in the port area are elevated above the risks in communities
11 elsewhere in the SCAB. The CARB study attributed this to operational emissions from
12 port-area sources within and near the Ports. At the same time, however, the MATES
13 studies have documented substantial decreases in cancer risk to Port-area populations
14 over the past 20 years. For example, the MATES V study (SCAQMD 2021) concluded
15 that, “The air toxics cancer risk in the ports areas decreased by approximately 57%
16 between MATES IV and MATES V. Overall, air toxics risk improved significantly,
17 consistent with air toxic emissions reductions that occurred over the time period.”
18 Despite these marked improvements, however, MATES V identified elevated levels of
19 cancer risks in the port area. Based on this information, cancer risk from TAC emissions
20 within the project region, including the past, present, and reasonably foreseeable future
21 projects and the Revised Project, is considered a significant cumulative impact. Non-
22 cancer impacts associated with past, present, and reasonably foreseeable projects in the
23 project area are also assumed to have significant cumulative impacts.

24 The Port has approved port-wide air pollution control measures through their CAAP
25 (SPBP 2006, 2010, 2017). Implementation of these measures would reduce the health
26 risk impacts from the Revised Project and future projects at the Port. Currently adopted
27 regulations and future rules proposed by CARB and EPA would also further reduce air
28 emissions and associated cumulative health impacts from Port operations. The scope and
29 framework of the 2017 CAAP Update continues to examine the five major mobile
30 sources of air pollution in and around the ports and established new Bay-wide Standards
31 for the future. The 2017 CAAP update also addresses zero emission technologies,
32 greenhouse gas control strategies, energy efficiency strategies, and supply chain
33 optimization.

34 As reported in the Port’s 2023 Emissions Inventory (LAHD August 2024), progress on
35 the CAAP measures has been tracked since 2005. Due to the many emission reduction
36 measures undertaken by the Port, as well as statewide and federal regulations and
37 standards, the 2023 emission reduction standards were met for DPM, NO_x, and SO_x.
38 Specifically, the Port surpassed the 2023 DPM emission reduction standard (77%) with a
39 91% emission reduction in 2023. The Port also met the 2020 Health Risk Reduction
40 Standard (85%). Based on the progress reported to date since 2023, DPM emissions,
41 which represent the main source of TACs, has shown a declining trend, with a 91%
42 reduction since 2005, an 18% reduction since the 2017 CAAP update, and a 24%
43 reduction over the prior year in 2022. In order to put the maritime industry-related
44 emissions into context, the 2023 Emissions Inventory shows the Port’s overall
45 contributions to total DPM emissions in the SCAB as 5.7%. Nevertheless, given the
46 identified elevated cancer risk in the port area, emissions-related cancer and non-cancer
47 impacts within the project region are considered cumulatively significant.

Contribution of the Proposed Project (Prior to Mitigation)

Proposed Project construction and operational emissions of TACs would increase cancer risks in the immediate vicinity of the project site, but the incremental risks would be below the threshold of significance (10 in a million) for all receptors in comparison to both the fixed and the more conservative floating future baseline under CEQA (Table 3.2-28). Accordingly, the Proposed Project would not have a significant cancer risk impact under CEQA and NEPA and, consistent with the SCAQMD guidance described above, would not make a cumulatively considerable contribution to an existing significant cumulative impact for cancer risk under CEQA and NEPA.

The Proposed Project would not increase non-cancer chronic or acute impacts or population cancer burden above project-level significance thresholds; accordingly, those impacts would be less than significant. The operational impacts of related projects based on the location and type would be cumulatively significant if their combined operations resulted in TAC emissions exceeding an established threshold. For example, the adjacent Project #6 (Berths 97-106 China Shipping Development Project) and nearby Project #'s 1, 3, 11, 24, and 26 involving break bulk and liquid bulk marine terminals would likely generate TAC emissions from vessels, drayage trucks, cargo handling equipment, and rail operations. Although there is no way to be certain that a cumulative exceedance of the thresholds would happen for TAC emissions without performing health risk dispersion modeling of the other projects, it is reasonable to assume that cumulative air emissions are likely to exceed the thresholds, and the related projects would be required to implement CAAP measures and similar air quality mitigation measures as applicable for the various source categories. However, based on the Proposed Project's contribution (chronic and acute hazard indices ranging from less than 0 to 0.22, all below the SCAQMD significance threshold of 1.0 [Table 3.2-28) and the overall declining trend in DPM emissions portwide, which have exceeded the CAAP DPM emission reduction standard (77%) and the Baywide Health Risk Reduction Standard (85%), the Proposed Project would not cause or make a cumulatively considerable contribution to significant cumulative non-cancer chronic and acute health impacts.

Contribution of the Alternatives

Alternative 1's operational emissions of toxic air contaminants would result in cancer risk increments for all receptor types of less than 0 in comparison to the CEQA baseline and the future CEQA baseline (Table 3.2-33). As a result, Alternative 1 would not make a cumulatively considerable contribution to a significant cumulative impact for cancer risk under CEQA. NEPA does not require evaluation of Alternative 1.

Alternative 1's incremental chronic and acute indices and population cancer burden would be substantially below SCAQMD's project-level significance thresholds (Table 3.2-33). In fact, the cancer burden would be less than those of the CEQA baseline and the maximum chronic hazard index increments for residential and occupational receptors would be small fractions of the significance threshold. Accordingly, Alternative 1 would not make a cumulatively considerable contribution to a significant cumulative impact for chronic and acute hazards and population cancer burden under CEQA. NEPA does not require evaluation of Alternative 1.

Alternative 2's cancer risk, population cancer burden, and chronic or acute hazards risk increments would be similar to those of Alternative 1, i.e., either negative, for residential cancer risk and cancer burden, or small fractions of SCAQMD's project-level significance thresholds (Table 3.2-43). As a result, Alternative 2's impacts would be less than significant and would not make a cumulatively considerable contribution to a

1 significant cumulative impact for occupational cancer risk under CEQA. Because
2 Alternative 2 is identical to the NEPA baseline, there would be no impact under NEPA.

3 **Mitigation Measures and Residual Cumulative Impacts**

4 Although mitigation is not required because the Proposed Project's impacts would be less
5 than significant, mitigation measures MM AQ-1 through MM AQ-7 would be applied
6 during construction, and measures MM AQ-8 through MM AQ-10 and two lease
7 measures would be applied during operation to reduce emissions from construction and
8 operation (see Section 3.2.4.7 for descriptions of these measure); MM AQ-6 and the two
9 lease measures described in Section 3.2.4.7 are not quantified in this Draft EIS/EIR. As
10 Table 3.2-28 and Table 3.2-29 show, mitigation would substantially reduce the maximum
11 incremental health impacts of the Proposed Project.

12 Mitigation is not applicable to Alternative 1 and is not required, as Alternative 1 would
13 not make a cumulatively considerable contribution to a significant cumulative impact for
14 cancer risk, population cancer burden, or chronic and acute hazards risk under CEQA.

15 Although Alternative 2's impacts on public health would be less than significant, the
16 mitigation measures applied to the Proposed Project (except those related to in-water
17 construction) would be applied to Alternative 2 to reduce emissions from construction
18 and operation. The effects of those mitigation measures were not calculated because
19 mitigation is not required. However, it is reasonable to assume the impacts would be
20 reduced to a similar extent as for the Proposed Project.

21 **Cumulative Impact AQ-7: Would the Proposed Project or alternatives** 22 **make a cumulatively considerable contribution to a significant** 23 **cumulative impact from conflict with or obstruction of the** 24 **implementation of an applicable AQMP?**

25 **Impacts of Past, Present, and Reasonably Foreseeable Future** 26 **Projects**

27 Concurrent related projects at the Port and surrounding areas (see Table 4-1) would have
28 significant cumulative impacts if they result in population growth or operational
29 emissions that exceed the assumptions in the 2022 AQMP (SCAQMD 2023). The related
30 projects would be subject to regional planning efforts and applicable land use plans (such
31 as the General Plan, Community Plans, or the Particulate Measurement Program) or
32 transportation plans such as the Regional Transportation Plan and the Regional
33 Transportation Improvement Program. Since the Final 2022 AQMP account for
34 population projections that were developed by SCAG and accounts for planned land use
35 and transportation infrastructure growth, the related projects would be consistent with the
36 AQMP. Therefore, the related projects would not result in significant cumulative impacts
37 related to an obstruction of the AQMP.

38 **Contribution of the Proposed Project (Prior to Mitigation)**

39 The Proposed Project would produce emissions of nonattainment pollutants. As discussed
40 in Section 3.2.3.5, the 2022 AQMP proposes mobile source control measures and clean
41 fuel programs that are designed to bring the SCAB into attainment of the state and
42 national ambient air quality standards. Many of the AQMP control measures are adopted
43 as SCAQMD rules and regulations, which are then used to regulate sources of air
44 pollution in the region. Proposed sources must comply with all applicable SCAQMD

1 rules and regulations; therefore, the Proposed Project would not conflict with or obstruct
2 implementation of the AQMP.

3 LAHD regularly provides SCAG with its Port-wide cargo forecasts for development of
4 the AQMPs. Therefore, the attainment demonstration included in the 2022 AQMP
5 accounts for the emissions generated by projected future growth at the Port.
6 Furthermore, LAHD implements the 2017 CAAP Update, which sets goals and
7 implementation strategies that reduce air emissions from Port operations. In some cases,
8 CAAP measures have produced emission reductions that are greater than those forecasted
9 in the 2016 AQMP. Operational activities associated with the Proposed Project would
10 comply with the source-specific performance standards identified in the CAAP and
11 therefore would be consistent with emission reduction goals in the 2016 AQMP. As a
12 result, the Proposed Project would not make a cumulatively considerable contribution to
13 a cumulative impact in terms of conflicting with or obstructing implementation of an
14 applicable AQMP under CEQA or NEPA.

15 **Contribution of the Alternatives**

16 As with the Proposed Project, Alternatives 1 and 2 would not make a cumulatively
17 considerable contribution to a cumulative impact in terms of conflicting with or
18 obstructing implementation of an applicable AQMP under CEQA or NEPA

19 **Mitigation Measures and Residual Cumulative Impacts**

20 No mitigation is required because the Proposed Project and alternatives would not make a
21 cumulatively considerable contribution to a significant cumulative impact.

22 **4.2.3 Biological Resources**

23 **4.2.3.1 Scope of Analysis**

24 The geographic region of analysis for biological resources differs by organism groups
25 such as birds, fish, marine mammals, plankton, and benthic invertebrates. The mobility of
26 species in these groups, their population distributions, and the normal movement range
27 for individuals living in an area varies so that effects on biotic communities in one area
28 can affect those communities in other nearby areas.

29 For terrestrial biological resources (excluding water-associated birds), the geographic
30 region of analysis is limited to those land areas at the project site and extending
31 throughout the Port Complex, as this is where the majority of biological resources in the
32 vicinity are located. The resources present are common species that are abundant
33 throughout the region and are adapted to industrial areas in the Harbor. For marine
34 biological resources, excluding marine mammals, the geographical region of analysis for
35 benthic communities, water column communities (plankton and fish), and water-
36 associated birds is the water areas of the Los Angeles/Long Beach Harbor (inner and
37 outer Harbor areas) because the basins, slips, channels, and open waters are
38 hydrologically and ecologically connected. For marine mammals, the analysis area
39 includes the Los Angeles-Long Beach Harbor as well as the Pacific Ocean from near
40 Angels Gate out to Catalina Island in order to cover vessel traffic effects.

41 Special-status species have differing population sizes and dynamics, distributional
42 ranges, breeding locations, and life history characteristics. Because bird species are not
43 year-round residents but migrate to other areas where stresses unrelated to the Proposed

1 Project and other projects in the Harbor area can occur, the area for cumulative analysis is
2 limited to the Harbor. Sea turtles are not expected to occur in the Harbor and their
3 presence in the near-shore areas where vessel traffic could affect them is unlikely and
4 unpredictable; consequently, these animals are not considered in the cumulative analysis.

5 Past, present, and reasonably foreseeable future development that could contribute to
6 significant cumulative impacts on terrestrial resources are those projects that involve land
7 disturbance such as grading, paving, landscaping, construction of roads and buildings,
8 and related noise and traffic impacts. Noise, traffic, and other operational impacts can
9 also be expected to have significant cumulative impacts on terrestrial species. Marine
10 organisms could be affected by activities in the water, such as dredging, pile driving, and
11 vessel traffic. Runoff of pollutants from construction and operations activities on land
12 into Harbor waters via storm drains or sheet runoff also has the potential to affect marine
13 biota, at least near the storm drains.

14 The significance criteria used for the cumulative analysis are the same as those used for
15 the Proposed Project in Section 3.3.4.2. These criteria are the same for both the CEQA
16 and NEPA analyses.

17 **Cumulative Impact BIO-1: Would the Proposed Project or alternatives**
18 **contribute to a cumulative substantial adverse effect, either directly**
19 **or through habitat modifications, on any species identified as a**
20 **candidate, sensitive, or special status species in local or regional**
21 **plans, policies, or regulations, or by the California Department of**
22 **Fish and Wildlife or U.S. Fish and Wildlife Service?**

23 **Impacts of Past, Present, and Reasonably Foreseeable Future**
24 **Projects**

25 **Habitat Modification:** Construction of past fill projects in the Harbor has reduced the
26 amount of marine surface water present, and thus reduced foraging and resting areas for
27 special-status bird species, but these projects have also added more land and structures
28 that can be used for perching near the water. In 1979, LAHD began providing nesting
29 habitat for the California least tern; the nesting site is now on the southern tip of Pier 400.
30 Extensive shallow-water areas that provide foraging habitat for the California least tern
31 and other bird species have been constructed in the Harbor as mitigation for loss of
32 marine habitat from past projects. The breakwaters, particularly the Middle Breakwater,
33 which is isolated from human access, provide roosting areas for birds and the occasional
34 harbor seal. As described in Section 3.3, biological surveys have shown that marine
35 biological resources in the Harbor continue to flourish and that the quality of the marine
36 habitat continues to improve. Accordingly, impacts to special-status species as a result of
37 marine habitat loss are not cumulatively significant.

38 Periodic maintenance dredging (#17), and other future projects in the Port that could
39 involve extensive dredging or other in-water work, such as the marine oil terminal
40 improvement projects (#1, #15, #26, and #28), have the potential to affect California least
41 tern foraging adversely during construction activities. The effects of these activities
42 would be localized and temporary. Projects that are not near the nesting colony would not
43 be expected to have adverse effects on the California least tern. For these reasons,
44 impacts to the California least tern would not be cumulatively significant. With respect to
45 other special-status bird species (Table 3.3-1), it is not expected that any nesting or

1 foraging habitat or individuals would be lost as a result of development of the related
2 projects.

3 **Vessel Strikes:** Past, present, and future related projects have involved and will continue
4 to involve vessel traffic, although the number of vessels calling the Port each year has not
5 increased with the increase in cargo volumes; instead, vessels have become larger, rather
6 than more numerous. Ship strikes involving marine mammals and sea turtles, although
7 uncommon, have been documented for a number of listed species in the eastern North
8 Pacific (Section 3.3.2.6). In Southern California, potential strikes to blue whales are of
9 the most concern due to the migration patterns of blue whales and the established
10 shipping channels. Blue whales normally pass through the Santa Barbara Channel en
11 route from breeding grounds in Mexico to feeding grounds farther north. Incidental ship
12 strikes and fisheries interactions are listed by NMFS as the primary threats to the
13 California population.

14 Historical data on whale strikes suggest that vessel-speed reduction would substantially
15 reduce the potential for whale strikes because 80% of recorded strikes occurred with
16 ships traveling faster than 12 knots. The Port has in place its Vessel Speed Reduction
17 Program (VSRP), which lowers vessel speeds to 12 knots from Point Fermin out to 40
18 nautical miles from the Port. Port records show more than 90% participation in the
19 VSRP, thereby reducing potential for present and future increases in whale strikes due to
20 vessels entering the Harbor. In addition, the IMO recently modified the Traffic
21 Separation Scheme in the Santa Barbara Channel, which is expected to reduce co-
22 occurrence of whales and vessels. Operation of many of the related projects have in the
23 past and will in the future include vessel traffic to and from the Harbor, and continued
24 whale mortalities from vessel strikes is considered to be a significant cumulative impact.

25 **Underwater Noise:** In-water construction activities, and particularly pile driving, would
26 also result in underwater sound pressure waves that could affect marine mammals present
27 in the area. Any seals or sea lions present in the vicinity of Port construction projects
28 would likely avoid the disturbance areas and thus would not be injured. In addition, in-
29 water construction of related projects near the Proposed Project, such as Berth 163-164
30 [NuStar-Valero] Marine Oil Terminal Wharf Improvements Project (#1), Berths 148-151
31 (Phillips 66) Marine Oil Terminal Improvement Project (#15), Berths 238-239 [PBF
32 Energy] Marine Oil Terminal Improvement Project (#26), and Berths 167-169 [Shell]
33 Marine Oil Terminal Wharf Improvements Project (#28) could occur concurrently;
34 however, concurrent construction activities in the Harbor are unlikely to have an adverse
35 cumulative effect on the marine mammals because ample area exists for any marine
36 mammals that happen to be in the area to move in order to avoid disturbance. As a
37 consequence, construction of the related projects would not be expected to result in
38 significant cumulative impacts to marine mammals under CEQA or NEPA.

39 The related projects that have involved vessel traffic can be assumed to have increased
40 ambient underwater sound in the Harbor and in the ocean from the vessel traffic lanes to
41 Angels Gate and Queens Gate. This increase is assumed on the basis of the increased size
42 of vessels, as vessel numbers are not expected to increase substantially. Marine terminal
43 upgrade and expansion projects (i.e., Berths 226-236 [Everport] Container Terminal [#2],
44 Outer Harbor Cruise Terminal [#18], Berths 302-306 [Fenix] Container Terminal Project
45 [#25], Middle Harbor Terminal Redevelopment [#32], and Piers G & J Terminal
46 Redevelopment [#33] could continue to increase ambient underwater sound. That
47 increase could cause some individual marine mammals to avoid the vessels as they move
48 into, through, and out of the Harbor. However, the increase is not expected to result in a
49 significant cumulative impact, as a substantial change in underwater noise would require

1 a substantial increase in vessel activity, which is not expected. Therefore, in-water noise
2 impacts would not be expected to represent a significant cumulative impact on sensitive
3 species.

4 **Contribution of the Proposed Project (Prior to Mitigation)**

5 As discussed in Section 3.3.4.3, construction of the Proposed Project is not likely to result
6 in the loss of individuals or the reduction of existing critical habitat of a state or federally
7 listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species
8 of Special Concern. No designated or proposed critical habitat is present in or adjacent to
9 the proposed project area. In-water construction would cause localized activity, noise,
10 and turbidity that could affect birds and marine mammals. However, these impacts would
11 be temporary and limited to the waters in the vicinity of construction activities.

12 Implementation of required water quality monitoring during dredging according to the
13 requirements of the RWQCB, and implementation of standard dredging BMPs via
14 adaptive management of the dredging, would keep these impacts to a less-than-significant
15 level. Therefore, the Proposed Project would not make a cumulatively considerable
16 contribution to a significant cumulative impact related to special-status species from
17 construction activities under CEQA and NEPA.

18 Pile driving is anticipated to result in disturbance (Level B harassment) to marine
19 mammals (particularly harbor seals and sea lions) in the vicinity of piledriving
20 operations. Noise from impact pile driving could cause seals and sea lions to avoid
21 construction areas during pile driving but would not result in the loss of individuals or
22 habitat. Impacts would be significant but impacts on marine mammals resulting from
23 noise associated with pile driving would be reduced with implementation of MM BIO-1
24 (Protect Marine Mammals). Because this measure would ensure that marine mammals
25 would avoid pile-driving areas, no injury to marine mammals from pile-driving sounds
26 would be expected. Accordingly, the Proposed Project would not make a cumulatively
27 considerable contribution to a significant cumulative impact related to pile driving.

28 Vessel activity from the Proposed Project would result in underwater noise. However,
29 the small increase in vessels calling at the Berths 121-131 Terminal (3 additional calls per
30 year at full operation) relative to the total number of vessels calling in the Port of Los
31 Angeles (1,867 in 2019) would not result in a measurable change in overall underwater
32 noise. Therefore, the Proposed Project would not make a cumulatively considerable
33 contribution to a significant cumulative impact related to special-status species from
34 underwater noise under CEQA and NEPA.

35 The small increase in vessel traffic associated with the Proposed Project would not
36 substantially increase the likelihood of a vessel collision with a marine mammal or sea
37 turtle. The additional vessel calls annually resulting from the Proposed Project would be a
38 minor increase in overall vessel calls to the Port, and as described in Section 3.3.4.3,
39 recent data suggest that increases in ship strikes likely result from higher abundance of
40 whales in nearshore waters and higher vessel speeds, rather than more vessels.

41 Implementation of MM AQ-7 (Vessel Speed Reduction) would reduce the potential for
42 vessel collision with marine mammals. Accordingly, the Proposed Project would have a
43 low probability of vessel strikes, and operation of the Proposed Project would not make a
44 cumulatively considerable contribution to a significant cumulative impact to marine
45 mammals (the potential contribution to whale mortality) from vessel strikes under CEQA
46 and NEPA.

Contribution of the Alternatives

Alternatives 1 (No Project) and 2 (No Federal Action) would not include any in-water construction; accordingly, neither would contribute to cumulative impacts related to water quality, vessel activity, or construction-related underwater noise. Operational vessel calls would increase under both alternatives compared to the CEQA baseline, but for the reasons described for the Proposed Project, impacts related to underwater noise and vessel strikes on marine mammals would not be significant. Accordingly, neither alternative would make a cumulatively considerable contribution to a significant cumulative impact related to special-status species under CEQA. Alternative 2 would be identical to the NEPA baseline and would therefore have no impacts on special-status species under NEPA.

Mitigation Measures and Residual Cumulative Impacts

Implementation of mitigation measure MM BIO-1, which requires the establishment of a safety zone and monitoring for marine mammals within the general area of construction, would reduce potential cumulative effects from pile driving on marine mammals and ensure that the Proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact related to underwater noise from pile driving.

Neither of the alternatives would make a cumulatively considerable contribution to a significant cumulative impact and therefore do not require mitigation.

Cumulative Impact BIO-2: Would the Proposed Project or alternatives contribute to a cumulatively substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Essential Fish Habitat (EFH) has been and would be lost due to past (since 1996, when the provisions of EFH came into effect), present, and future landfill projects in the Harbor. The projects in Table 4-1 that have resulted in or could result in a loss of EFH or adverse effects on EFH are the ones involving fill to create new land and dredging to deepen berths and channels. Losses of EFH have been mitigated through the application of the Port's habitat mitigation banks. Temporary disturbances of EFH may also occur during in-water construction activities from many of the related cumulative projects. These disturbances occur at specific locations that are scattered in space and time within the Harbor. The concurrent construction activities at these sites are unlikely to increase impacts to EFH that could further degrade the habitat or ultimately result in increases in significant cumulative impacts because they would be relatively short in duration and would not occur concurrently. Furthermore, effects from dredging and other localized construction activities diminish rapidly with distance from the in-water activity. Increased vessel traffic and runoff from upland construction and operations resulting from the cumulative projects would not be expected to result in a loss of EFH nor would these activities cumulatively alter or reduce this habitat. Recent harbor-wide surveys (e.g., MBC 2016, Wood E&IS 2021) have documented abundant assemblages of managed species in the Harbor. Accordingly, the related projects do not have a significant cumulative impact on EFH.

1 Natural habitats, special aquatic sites (i.e., eelgrass beds, kelp, mudflats) and wetlands
2 have a limited distribution and abundance in the Harbor. Mudflats and wetlands were
3 once extensive in the Port, but the early development of the Port converted most of those
4 areas into basins, channels, and upland, and only a few small mudflat and wetland areas
5 remain. Project development in the Port would not affect either habitat type, nor would
6 the related projects outside the Port. Harbor-wide surveys have identified steadily
7 increasing amounts of both eelgrass and kelp in the Harbor (Wood E&IS 2021), partly as
8 a result of mitigation for past impacts of related projects on eelgrass and partly as a result
9 of improved habitat conditions in the Harbor. Accordingly, the recent past, present, and
10 reasonably foreseeable future projects do not have a significant cumulative impact on
11 special aquatic sites or habitats.

12 However, increased vessel traffic associated with the related projects involving marine
13 terminal expansions and operations could result in increased risk of introduction of
14 invasive species to the Harbor's biological communities. These vessels have introduced
15 invasive exotic species into the Harbor through ballast water discharges and via their
16 hulls. Ballast water discharges are now regulated so that the potential for introduction of
17 invasive exotic species by this route has been greatly reduced. The potential for
18 introduction of invasive exotic species via vessel hulls has remained about the same, and
19 use of antifouling paints and periodic cleaning of hulls to minimize frictional drag from
20 growth of organisms keeps this source low. While invasive exotic species are present in
21 the Harbor, there is no evidence that these species have substantially disrupted the
22 biological communities in the Harbor. Biological studies conducted in the Harbor
23 continue to show the existence of diverse and abundant biological communities.

24 However, absent the ability to completely eliminate the introduction of new species
25 through ballast water or on vessel hulls, it is possible that ecologically disruptive invasive
26 exotic species could become established in the Harbor over time, even with these control
27 measures. As a consequence, past, present, and reasonably foreseeable future projects are
28 considered to represent a significant cumulative impact on biological resources related to
29 the introduction of invasive exotic species to Harbor waters.

30 **Contribution of the Proposed Project**

31 There are no SEAs, natural plant communities, mudflats, marshes, wetlands, giant kelp
32 beds, or eelgrass beds in the vicinity of the Berths 121-131 Terminal that would be
33 affected by construction or operation of the Proposed Project (Section 3.3.2).

34 Construction effects on EFH would be localized in the West Basin and temporary. They
35 would consist of turbidity and underwater noise from dredging, dredge material disposal,
36 pile-driving, the removal and replacement of the rock dike, and wharf construction. As
37 discussed in Section 3.3.4.3, impacts from these activities would be temporary and
38 localized, and minimized by the implementation of MM BIO-1 (underwater noise safety
39 zone and monitoring related to marine mammals), pre-dredge screening, water quality
40 monitoring, and adaptive management and use of BMPs. Operational effects on EFH
41 would consist of additional underwater noise from the increased vessel traffic, but, as
42 described in Section 3.3.4.3, the increment would not be substantial. Accordingly, the
43 Proposed Project would not make a cumulatively considerable contribution to a
44 significant cumulative impact under CEQA or NEPA.

45 The Proposed Project's increase in vessel traffic in the Harbor (up to 3 vessels annually
46 relative to the CEQA baseline) would not add substantially to the cumulative potential for
47 introduction of exotic species. Because ballast water regulations would reduce the
48 potential for introduction of non-native species and the increase in vessel calls would be

1 small, operation of the Proposed Project related to the introduction of non-native species
2 would not make a cumulatively considerable contribution to a significant cumulative
3 impact under CEQA and NEPA.

4 **Contribution of the Alternatives**

5 Because under Alternative 1 (No Project) there would be no new construction at the
6 Project site, there would be no loss of EFH and no impacts on managed species related to
7 construction. Operation of the No Project Alternative would involve more vessel calls
8 than under the CEQA baseline (55 additional vessel calls per year). Although those calls
9 would be insubstantial relative to overall vessel traffic at the Port, the increased vessel
10 calls relative to the CEQA baseline are assumed to make a cumulatively considerable
11 contribution to a significant cumulative impact related to the introduction of non-native
12 species under CEQA. For the reasons described for the Proposed Project, impacts related
13 to EFH, riparian habitat, and other special aquatic sites would not make considerable
14 contributions to significant cumulative impacts. Alternative 1 is not required to be
15 analyzed under NEPA.

16 Because under Alternative 2 (No Federal Action) only minor backlands improvements
17 would occur on the existing developed Project site, construction would result in no
18 reduction or alteration of EFH, special habitats, aquatic sites, or biological communities.
19 Operations under Alternative 2 would be similar to those under Alternative 1;
20 accordingly, operation of Alternative 2 is assumed to make a cumulatively considerable
21 contribution to a significant cumulative impact related to the introduction of non-native
22 species under CEQA. For the reasons described for the Proposed Project, impacts related
23 to EFH, riparian habitat, and other special aquatic sites would not make considerable
24 contributions to significant cumulative impacts. Alternative 2 would result in no impact
25 under NEPA because Alternative 2 is identical to the NEPA baseline.

26 **Mitigation Measures and Residual Cumulative Impacts**

27 Alternatives 1 and 2 would make a cumulatively considerable contribution to a
28 significant cumulative impact under CEQA related to the introduction of non-native
29 species. Due to the lack of a proven technology, no feasible mitigation beyond existing
30 legal requirements is currently available to prevent introduction of invasive exotic species
31 via vessel hulls or ballast water. New technologies are being explored and, if methods
32 become available in the future, they would be implemented as required at that time.
33 Consequently, both alternatives would make cumulatively considerable and unavoidable
34 contributions to significant cumulative impacts to biological resources under CEQA.
35 Alternative 1 is not applicable to NEPA and Alternative 2 would result in no impact
36 under NEPA.

37 **Cumulative Impact BIO-3: Would the Proposed Project or**
38 **alternatives contribute to a cumulatively considerable adverse effect**
39 **on state or federally protected wetlands (including, but not limited to,**
40 **marsh, vernal pool, coastal, etc.) through direct removal, filling,**
41 **hydrological interruption, or other means?**

42 **Impacts of Past, Present, and Reasonably Foreseeable Future** 43 **Projects**

44 No known terrestrial wildlife or aquatic species migration corridors are present in the
45 Harbor. Migratory birds pass through the Harbor area and some, such as the California

1 least tern, rest or breed in this area. Past, present, and reasonably foreseeable future
2 related projects in the Harbor would not interfere with movement of these species
3 because the birds are able to avoid obstructions caused by equipment and structures.
4 Some species of fish move into and out of the Harbor during different parts of their life
5 cycle or seasonally, but no specific corridors for this movement have been identified.
6 Marine mammals migrate along the coast, and vessel traffic associated with the
7 cumulative projects could interfere with their migration. However, because the area in
8 which the marine mammals can migrate is large and cargo vessels generally use
9 designated travel lanes and travel slowly within 40 miles of the Port, the probability of
10 interference with migrations is low.

11 Underwater sound, especially from pile driving, could result in temporary avoidance of
12 construction areas by fish, and could even cause mortality. Concurrent construction of the
13 related projects is unlikely to have an adverse cumulative effect on pelagic species
14 because ample area exists in the Harbor for individuals to move to avoid any disturbance.
15 Some demersal species would be less likely to move away from construction areas;
16 however, species managed under the Pacific Groundfish FMP are not abundant in the
17 Harbor, and therefore construction would not affect substantial numbers of individuals.

18 In-water construction, particularly activities that produce turbidity such as dredging, pile
19 removal, and shoreline reconstruction, could cause temporary disturbances to fish
20 species. Related projects that would include such activities are the Berth 163-164
21 [NuStar-Valero] Marine Oil Terminal Wharf Improvements Project (#1), Berths 191-194
22 (Ecocem) Low-Carbon Cement Processing Facility Project (#3), Berths 148-151 (Phillips
23 66) Marine Oil Terminal Improvement Project (#15), Maintenance Dredging (#17),
24 Berths 238-239 [PBF Energy] Marine Oil Terminal Improvement Project (#26), Berths
25 167-169 [Shell] Marine Oil Terminal Wharf Improvements Project (#28), Middle Harbor
26 Redevelopment Project (#32), Piers G & J Redevelopment (#33), and Pier Wind
27 Terminal Development (#40). Vessel traffic also causes temporary turbidity in channels
28 and basins of the two ports. Accordingly, past related projects involving increased vessel
29 traffic, including the Everport Container Terminal (#2), China Shipping Container
30 Terminal (#8), Berths 302-306 (APL/Fenix) Container Terminal (#25), Berths 167-169
31 (Shell) Marine Oil Terminal Wharf Improvements (#28), Middle Harbor Redevelopment
32 Project (#32), and Piers G & J Redevelopment (#33). These disturbances in the Port
33 Complex occur at specific locations that are scattered in space and time. The concurrent
34 construction and vessel movement activities at these sites would be short in duration, and
35 potential effects of turbidity would diminish rapidly with time and distance from the
36 activity. Accordingly, construction of the related cumulative projects would not be
37 expected to have a significant cumulative impact related to wildlife movement or
38 migration corridors.

39 **Contribution of the Proposed Project**

40 As described in Section 3.3.4.3, there are no identified wildlife movement or migration
41 corridors at or near the project site. Construction activities at the project site would not
42 block or interfere with migration or movement of any bird species covered under the
43 Migratory Bird Treaty Act because the work would be in a small portion of the Harbor
44 area where the birds occur, and the birds could easily fly around or over the work. In-
45 water construction activities would produce turbidity and underwater noise, but because
46 they would be restricted to the West Basin, they would not block the movements of fish
47 or marine mammals. Construction vessel traffic would not interfere with whale
48 migrations along the coast, as these vessels would represent a small proportion of the

1 total Port-related commercial traffic in the area, and each vessel would have a low
2 probability of encountering migrating whales during transit through coastal waters
3 because these animals are generally sparsely distributed offshore and rarely enter the Port
4 Complex (LAHD and USACE 2007). Therefore, construction of the Proposed Project
5 would not affect migration, including bird and marine mammal movement or migration
6 corridors.

7 Operation of the Proposed Project would not substantially increase underwater sound
8 levels because the increased vessel traffic (at full operation, 3 vessels more than baseline)
9 would represent a small proportion of the total vessel traffic in the Harbor. Consequently,
10 construction and operation of the Proposed Project would not make a cumulatively
11 considerable contribution to a significant cumulative impact on wildlife movement or
12 migration corridors under CEQA or NEPA.

13 **Contribution of the Alternatives**

14 No significant wildlife corridors exist on or near the proposed project site, and because
15 under Alternative 1 there would be no construction at the project site, there would be no
16 impacts on wildlife movement related to construction noise or water quality. Operation of
17 Alternative 1 would involve more vessel traffic than under the baseline, but as with the
18 Proposed Project, the increased vessel traffic would represent a small proportion of the
19 total Port-related commercial traffic in the Harbor. Accordingly, Alternative 1 would not
20 make a cumulatively considerable contribution to a significant cumulative impact under
21 CEQA related to wildlife migration or movement corridors. Alternative 1 is not required
22 to be analyzed under NEPA.

23 Alternative 2 would not involve any in-water construction. No significant wildlife
24 corridors exist on or near the proposed project site, and because under Alternative 2 the
25 only new structures under Alternative 2 would be the RMG cranes in the expanded
26 railyard, there would be no interference with wildlife movement or migration corridors.
27 As with the Proposed Project, operation of Alternative 2 would not interfere with wildlife
28 movement or migration. Therefore, Alternative 2 would not make a cumulatively
29 considerable contribution to a significant cumulative impact under CEQA related to
30 wildlife migration or movement corridors. Alternative 2 would result in no impact under
31 NEPA because Alternative 2 is identical to the NEPA baseline.

32 **Mitigation Measures and Residual Cumulative Impacts**

33 Neither the Proposed Project nor any alternative would make a cumulatively considerable
34 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
35 mitigation measures would be required.

36 **Cumulative Impact BIO-4: Would the Proposed Project or alternatives 37 contribute to a cumulatively considerable interference with the 38 movement of any native resident or migratory fish or wildlife species 39 or with established native resident or migratory wildlife corridors, or 40 impede the use of native wildlife nursery sites?**

41 **Impacts of Past, Present, and Reasonably Foreseeable Future 42 Projects**

43 The Port consists of highly industrialized land areas that support mostly non-native plants
44 and limited wildlife species that are adapted to disturbance and human activities.

1 Accordingly, construction of past, present, and reasonably foreseeable projects in the
2 Harbor have had and will have little impact on terrestrial biological communities. In-
3 water construction of related projects, notably Berths 226-236 [Everport] Container
4 Terminal (#2), Maintenance Dredging (#17), Middle Harbor Terminal (#32), and Piers
5 G&J Terminal (#33), has temporarily disturbed sediments and hard-substrate habitat (i.e.,
6 piles and rocky dikes). These disturbances alter the benthic habitats present at the
7 location of the specific projects, but effects on benthic communities are localized and of
8 short duration, as benthic and invertebrate communities are shown to recolonize quickly
9 following dredging. Fish and marine mammals are temporarily displaced by construction
10 activities but return after construction ends. Because these activities affect a small portion
11 of the Harbor during any single episode, and recovery has occurred or is in progress,
12 biological communities in the Harbor have not been substantially degraded. In fact,
13 recent harbor-wide biological surveys have shown steady improvement in the quality of
14 marine habitats and increases in abundance and diversity (Wood E&IS 2021). The
15 invasive green alga *Caulerpa taxifolia* has not been detected in the course of any in-water
16 construction project, and protocols for its detection and elimination are in place (Section
17 3.3.2.8). Accordingly, construction of the related projects does not represent a significant
18 cumulative impact with respect to local biological communities.

19 Operational activities of the related projects could disrupt marine communities through
20 underwater noise from vessels, turbidity and discharges from vessel activity, and runoff
21 from terminals. The related projects result in increased vessel traffic, but the cumulative
22 increase is not substantial relative to total traffic in the Port Complex, and the increase in
23 underwater noise and turbidity from those vessels would not be substantial. Operation of
24 the related cumulative projects would result in increased vessel traffic to and from the
25 Port. There is the possibility, although remote, of accidental spills from one or more
26 vessels that conceivably could release enough fuel into ocean waters to result in impacts
27 to biological resources. However, in the unlikely event of a spill, it would be subject to
28 regulations regarding containment, clean-up, and remediation. The related projects have
29 increased the amount of paved land, thereby increasing runoff, but improved stormwater
30 management practices ensure that the increased runoff does not cause increased
31 contaminant inputs to the Harbor. Accordingly, the related projects are not considered to
32 represent a significant cumulative impact with regard to these issues.

33 **Contribution of the Proposed Project (Prior to Mitigation)**

34 The Proposed Project would include minor upland construction on paved terminal areas;
35 accordingly, there would be minimal disturbance of terrestrial biological communities.
36 There would be substantial in-water construction involving dredging, pile removal and
37 installation, wharf demolition and construction, and shoreline reconstruction. These
38 activities would disturb the benthic community in the West Basin, but the community
39 would begin recolonization soon after construction is completed. Resuspension of
40 contaminants of concern during dredging could adversely affect aquatic organisms if
41 contaminants of concern are present in sufficient dissolved concentrations; however, this
42 effect would be limited in duration and confined to the vicinity of the dredging.
43 Additionally, water quality monitoring and construction BMPs, including the potential
44 use of silt curtains, would reduce the potential for these effects.

45 As discussed in Section 3.3.4.3, in-water construction could cause short-term impacts on
46 marine mammals and fish (including those with designated EFH) in the West Basin in the
47 immediate vicinity of the Berths 121-131 Terminal. The disturbances would be
48 temporary and limited to a portion of the West Basin adjacent to the project site.
49 Implementation of MM BIO-1 would minimize the potential for underwater noise to

1 cause substantial disruption to marine mammals and fish. No structures would be built
2 that would substantially increase the amount of shading experienced by marine
3 communities. Implementation of the *Caulerpa* protocols would minimize the potential for
4 in-water construction to spread this species. As a result, construction of the Proposed
5 Project would not make a cumulatively considerable contribution to a significant
6 cumulative impact to the local biological community under CEQA and NEPA.

7 The Proposed Project's contributions to operational impacts would involve spills and
8 runoff from vessels and the terminal and the effects of increased vessel traffic. Existing
9 stormwater and spill response controls, as required by the terminal's permits, would
10 reduce the potential for spills or contaminated runoff to have adverse effects on
11 biological communities. As a result, operation of the Proposed Project would not make a
12 cumulatively considerable contribution to a significant cumulative impact to the local
13 biological community under CEQA and NEPA related to spills and runoff.

14 **Contribution of the Alternatives**

15 Because under Alternative 1 there would be no construction that could result in any
16 disruption of local biological communities, no impacts would occur under CEQA.
17 Therefore, Alternative 1 would not make a cumulatively considerable contribution to a
18 significant cumulative impact to the local biological communities under CEQA related to
19 construction. Further, though there would be an increase of vessel calls to the site under
20 Alternative 1, for the same reasons as described for the Proposed Project, the potential for
21 an accidental vessel spill under Alternative 1 would not make a cumulatively
22 considerable contribution to a significant cumulative impact on biological communities
23 under CEQA. Alternative 1 is not required to be analyzed under NEPA.

24 Because under Alternative 2 there would be no in-water construction and only minor
25 upland construction, there would be no disruption of local biological communities related
26 to construction, and no impacts related to construction would occur under CEQA.
27 Therefore, Alternative 2 would not make a cumulatively considerable contribution to a
28 significant cumulative impact to the local biological communities under CEQA related to
29 construction. Further, though there would be an increase of vessel calls to the site under
30 Alternative 2, for the same reasons as described for the Proposed Project, the potential for
31 an accidental vessel spill or terminal runoff under Alternative 2 would not make a
32 cumulatively considerable contribution to a significant cumulative impact on biological
33 communities under CEQA. Because Alternative 2 is identical to the NEPA baseline, it
34 would have no impacts under NEPA.

35 **Mitigation Measures and Residual Cumulative Impacts**

36 No mitigation is required under CEQA or NEPA for impacts of construction, runoff from
37 construction and operation, or accidental vessel spills.

38 **Cumulative Impact BIO-5: Would the Proposed Project or alternatives** 39 **make a considerable contribution to a cumulatively considerable** 40 **conflict with any local policies or ordinances protecting biological** 41 **resources, such as a tree preservation policy or ordinance?**

42 **Impacts of Past, Present, and Reasonably Foreseeable Future** 43 **Projects**

44 As described in Section 3.3, the only biological resources protected by City of Los
45 Angeles ordinance are certain native tree species. These species are rare in the

1 industrialized areas in and around the Port of Los Angeles, and it is not expected that any
2 of the related projects other than, possibly, some of the commercial and residential
3 projects, would conflict with the City ordinance. There are no other local ordinances or
4 policies that a substantial number of related projects would conflict with. Accordingly,
5 the related projects do not represent a significant cumulative impact.

6 **Contribution of the Proposed Project**

7 As described in Section 3.3.4.3, none of the biological resources protected by City of Los
8 Angeles ordinance or other local ordinances or policies occurs on the Project site. As
9 there would be no project-specific impact, the Proposed Project and the alternatives
10 would not make a cumulatively considerable contribution to a significant cumulative
11 impact related to conflict with local policies or ordinances under CEQA and NEPA.

12 **Contribution of the Alternatives**

13 As described in Section 3.3.4.3, the No Project and No Federal Action alternatives would
14 not conflict with local ordinances or policies related to biological resources. Accordingly,
15 neither of the alternatives would make a cumulatively considerable contribution to a
16 significant cumulative impact under CEQA. Alternative 1 is not required to be analyzed
17 under NEPA. Alternative 2 would result in no impact under NEPA because Alternative 2
18 is identical to the NEPA baseline.

19 **Mitigation Measures and Residual Cumulative Impacts**

20 No mitigation is required because the Proposed Project and alternatives would not make a
21 cumulatively considerable contribution to a significant cumulative impact.

22 **Cumulative Impact BIO-6: Would the Proposed Project or alternatives 23 contribute to a cumulatively considerable conflict with the provisions 24 of an adopted Habitat Conservation Plan, Natural Community 25 Conservation Plan, or other approved local, regional, or state habitat 26 conservation plan?**

27 **Impacts of Past, Present, and Reasonably Foreseeable Future 28 Projects**

29 The related projects in Table 4-1 are located in industrialized or otherwise developed
30 areas. The only NCCP in the area is in the City of Rancho Palos Verdes (CDFW 2021),
31 and none of the related projects would affect that resource. As described in Section
32 3.3.4.3, the only HCP/Significant Ecological Area designated by Los Angeles County in
33 the area of the Port is the Pier 400 least tern nesting site. None of the related projects is
34 expected to have a substantial adverse effect on that resource. Accordingly, the related
35 projects do not represent a significant cumulative impact.

36 **Contribution of the Proposed Project**

37 As described in Section 3.3.4.3, the Proposed Project would not adversely affect any
38 NCCP, NCP/SEA, or resource protected by another habitat conservation plan. As there
39 would be no project-specific impact, the Proposed Project and the alternatives would not
40 make a cumulatively considerable contribution to a significant cumulative impact related
41 to conflict with habitat conservation plans under CEQA and NEPA.

1 **Contribution of the Alternatives**

2 As described in Chapter 2 and Section 3.3.4.3, neither the No Project nor the No Federal
3 Action alternative would adversely affect any NCCP, NCP/SEA, or resource protected by
4 another habitat conservation plan. Accordingly, neither of the alternatives would make a
5 cumulatively considerable contribution to a significant cumulative impact under CEQA.
6 Alternative 1 is not required to be analyzed under NEPA. Alternative 2 would result in no
7 impact under NEPA because Alternative 2 is identical to the NEPA baseline.

8 **Mitigation Measures and Residual Cumulative Impacts**

9 No mitigation is required because the Proposed Project and alternatives would not make a
10 cumulatively considerable contribution to a significant cumulative impact.

11 **Cumulative Impact BIO-7: Would the Proposed Project or alternatives 12 contribute to a cumulatively considerable permanent loss of marine 13 habitat?**

14 **Impacts of Past, Present, and Reasonably Foreseeable Future 15 Projects**

16 Construction of recent past projects in the Port Complex has resulted in the loss of marine
17 habitat through fill to create new land in marine terminals. Examples include Berths 97–
18 109, China Shipping Development Project (#8), Middle Harbor Terminal (#32), and Piers
19 G&J Terminal (#33). The losses of marine habitat in the Port Complex have been fully
20 mitigated by application of habitat mitigation credits from both ports. One other related
21 project, Pier Wind Terminal Development (#40), would involve substantial fill and
22 dredging, which would result in a permanent loss of marine habitat. However, if the
23 project is authorized, that loss would be required to be mitigated by application of habitat
24 credits and other compensatory mitigation provided by the Port of Long Beach.
25 Accordingly, the related projects do not represent a significant cumulative impact.

26 **Contribution of the Proposed Project**

27 As described in Section 3.3, no loss of marine habitat would occur because the Proposed
28 Project would not result in fill. The new wharf would have the same footprint as the
29 existing wharf and would therefore not increase shading or otherwise result in a loss of
30 habitat. As there would be no project-specific impact, the Proposed Project and the
31 alternatives would not make a cumulatively considerable contribution to a significant
32 cumulative impact related to permanent loss of marine habitat under CEQA and NEPA.

33 **Contribution of the Alternatives**

34 As described in Chapter 2 and Section 3.3, no loss of marine habitat would occur under
35 the No Project or No Federal Action alternatives. Accordingly, neither of the alternatives
36 would make a cumulatively considerable contribution to a significant cumulative impact
37 under CEQA. Alternative 1 is not required to be analyzed under NEPA. Alternative 2
38 would result in no impact under NEPA because Alternative 2 is identical to the NEPA
39 baseline.

40 **Mitigation Measures and Residual Cumulative Impacts**

41 No mitigation is required because the Proposed Project and alternatives would not make a
42 cumulatively considerable contribution to a significant cumulative impact.

4.2.4 Cultural Resources & Tribal Cultural Resources

4.2.4.1 Scope of Analysis

The geographic region of analysis for cumulative impacts on archaeological, ethnographic, architectural, and paleontological resources related to Port projects consists of the areas at the Port and in the immediate vicinity within natural landforms (i.e., excluding modern Port in-fill development). Under CEQA and NEPA, it also includes areas in water where there may be submerged prehistoric remains and/or where there is evidence that historical maritime activity could have occurred. Thus, past, present, planned and foreseeable future development that would contribute to cumulative impacts on archaeological and ethnographic resources under CEQA and NEPA includes projects that would have the potential for ground disturbance in this region of analysis. Those projects on land that have the potential to modify and/or demolish structures over 50 years of age have the potential under CEQA and NEPA to contribute to cumulative impacts on historical architectural resources. Projects that involve grading of intact, natural landforms (i.e., not imported/modern fill material) have the potential under CEQA to contribute to cumulative impacts on paleontological resources.

The significance criteria used for the cumulative analysis are the same as those used for the Proposed Project in Section 3.4.4.2. The criteria for CR-1, CR-2, and CR-3 apply to both the CEQA and NEPA analysis.

Cumulative Impact CR-1: Would the Proposed Project or alternatives have the potential to make a cumulatively considerable contribution to a significant cumulative impact on the significance of a historical resource pursuant to § 15064?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past projects in the study area, including the Project area, have involved demolition of some architectural structures that could be now considered historic, most often without the benefit of their recordation beforehand. Although each structure over 50 years old is not necessarily unique, historic buildings and some buildings that were demolished before meeting the definition of historic could have contributed to understanding events that have made a significant contribution to the broad patterns of history, may have been associated with the lives of persons significant in the past, and/or may have been architecturally distinctive. Their demolition without previous recordation may have reduced historians' ability fully to describe the region's heritage.

Several present and proposed future projects could require removal of historical architectural resources within the Port Complex (i.e., demolition of structures over 50 years of age that are or may be eligible for listing in the CRHR or NRHP), including the Berth 164 [Valero] Marine Oil Terminal (#1), Al Larson Boat Shop (#24), and Star-Kist Cannery (#27) projects. Impacts associated with past, present, and reasonably foreseeable future projects regarding historical architectural resources could be cumulatively significant if they include the removal of significant or potentially significant historical architectural resources. Although all such resources would be subject to mitigation, including recordation and inclusion in educational materials, most would still be demolished. This loss of multiple resources is considered by LAHD as a significant cumulative impact.

Contribution of the Proposed Project

As described in Section 3.4.4.3 (Impact CR-1), the Proposed Project would not result in any direct or indirect impacts to historical resources, since no such resources exist in the project area. Accordingly, the Proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact on built environment historical resources under CEQA or NEPA.

Contribution of the Alternatives

For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would not make a cumulatively considerable contribution to a significant cumulative impact on built environment resources under CEQA. Alternative 1 is not required to be analyzed under NEPA. Alternative 2 would result in no impact under NEPA because Alternative 2 is identical to the NEPA baseline.

Mitigation Measures and Residual Cumulative Impacts

No mitigation is required because the Proposed Project and alternatives would not make a cumulatively considerable contribution to a significant cumulative impact.

Cumulative Impact CR-2: Would the Proposed Project or alternatives have a potential to make a cumulatively considerable contribution to a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Archaeologists estimate that past and present projects within urban areas including the proposed project vicinity have destroyed over 80% of all prehistoric sites without proper assessment and systematic collection of information beforehand. As prehistoric sites are non-renewable resources, the direct and indirect impacts of these actions are cumulatively significant. Such projects have eliminated the ability to study sites that may have been likely to yield information important in prehistory. In other words, the vast majority of the archaeological record has already been lost.

Construction activities associated with most of the past, present, and future projects in the ports would be in areas that were either submerged before being profoundly altered by dredge-and-fill projects to create the modern port configuration, or are located on land that has been repeatedly disturbed and covered with imported fill. Accordingly, the potential for those projects to affect archaeological resources is remote. Furthermore, Port construction projects include provisions to prevent loss of previously unknown resources unexpectedly encountered during construction.

Although most of the port area has been previously disturbed, there is some potential for related projects on the periphery of the two ports (i.e., in upland areas) to disturb unknown, intact subsurface prehistoric or historical archaeological resources. These include the West Harbor Modification Project (#16), and Pier B Rail Yard Expansion (#28). In addition, current and reasonably foreseeable projects in upland areas outside the Port (i.e., San Pedro, Wilmington, and Carson) could encounter previously unknown archaeological resources. Those projects would take place largely on ground that has been previously disturbed by development, so that the potential for encountering such resources is low. However, the possibility cannot be completely ruled out, and it is

1 routine for construction projects to include procedural safeguards against loss of such
2 resources. Given the low probability of encountering intact resources, and the
3 implementation of safeguards against the loss of such resources, therefore, the present
4 and reasonably foreseeable future projects would not make a cumulatively considerable
5 contribution to a significant cumulative impact.

6 **Contribution of the Proposed Project**

7 As documented in Section 3.4.4.3 (Impact CR-2), no archaeological resources are
8 recorded within the Project site, and the potential of encountering intact, unknown
9 archaeological resources is considered to be extremely low in areas requiring activities
10 that may disturb surface soils. In addition, the Port would impose a special condition (SC
11 CR-1: Stop Work in the Area if Prehistoric and/or Archaeological Resources are
12 Encountered), as described in Section 3.4.4.3 (Impact CR-2) in the unlikely event that
13 archaeological resources are encountered during construction. Therefore, the Proposed
14 Project would not make a cumulatively considerable contribution to a significant
15 cumulative impact on known archaeological or ethnographic resources under CEQA or
16 NEPA.

17 **Contribution of the Alternatives**

18 For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would
19 not make a cumulatively considerable contribution to a significant cumulative impact on
20 known archaeological or ethnographic resources under CEQA. Alternative 1 is not
21 required to be analyzed under NEPA. Alternative 2 would result in no impact under
22 NEPA because Alternative 2 is identical to the NEPA baseline.

23 **Mitigation Measures and Residual Cumulative Impacts**

24 Although the Proposed Project would not contribute to a significant cumulative impact,
25 and no mitigation is required, standard condition of approval SC CR-1, which would be
26 imposed on the Proposed Project and Alternative 2, would further reduce the potential for
27 adverse effects. Accordingly, the residual contributions of the Proposed Project and
28 Alternative 2 to a significant cumulative impact would not be cumulatively considerable
29 under CEQA.

30 **Cumulative Impact CR-3: Would the Proposed Project or alternatives 31 have a potential to make a cumulatively considerable contribution to 32 a significant cumulative impact related to disturbance of human 33 remains, including those interred outside of formal cemeteries?**

34 **Impacts of Past, Present, and Reasonably Foreseeable Future 35 Projects**

36 The land in and near the Port has been subject to extensive development over the past 150
37 years, and many of the landforms that might have contained human remains outside a
38 formal cemetery have been substantially disturbed or destroyed by that development.
39 Accordingly, the impact of past development on such resources is difficult to estimate.
40 Given the degree of past disturbance that has characterized the land and shoreline areas of
41 the two San Pedro Bay ports, the potential for any of the related projects in those ports to
42 encounter human remains is remote.

43 Projects in upland areas outside the ports ((i.e., San Pedro, Wilmington, and Carson) are
44 more likely to encounter human remains during construction. As in the case of

1 archaeological resources (Cumulative Impact CR-2), construction projects routinely
2 include conditions requiring the protection of paleontological resources encountered
3 unexpectedly. None of the related projects is known to have the potential to affect formal
4 cemetery. Accordingly, the past, present, and reasonably foreseeable future projects
5 would not have a significant cumulative impact with respect to disturbing human
6 remains.

7 **Contribution of the Proposed Project**

8 As described in Section 3.4.4.3 (Impact CR-3), the project site consists largely of
9 imported/modern fill material (i.e., dredged material) constructed in the early twentieth
10 century, has been extensively redeveloped over the years, and is not an upland area.
11 Accordingly, the potential to encounter human remains would be very low, and the
12 Proposed Project would not make a cumulatively considerable contribution to a
13 significant cumulative impact under CEQA or NEPA.

14 **Contribution of the Alternatives**

15 The No Project Alternative (Alternative 1) would not have any potential to contribute to a
16 significant impact under CEQA because no construction would occur; Alternative 1 is not
17 required to be evaluated under NEPA. Because construction of Alternative 2 would take
18 place on previously disturbed soils in the terminal's backlands and would not involve
19 substantial excavation, the potential for encountering human remains would be minimal.
20 Alternative 2 would result in no impact under CEQA. Accordingly, Alternative 2 would
21 not make a cumulatively considerable contribution to a significant cumulative impact
22 under CEQA. Alternative 2 would result in no impact under NEPA because Alternative 2
23 is identical to the NEPA baseline.

24 **Mitigation Measures and Residual Cumulative Impacts**

25 No mitigation is required because the Proposed Project and alternatives would not make a
26 cumulatively considerable contribution to a significant cumulative impact.

27 **Cumulative Impact CR-4: Would the Proposed Project or alternatives**
28 **have a potential to make a cumulatively considerable contribution to**
29 **a significant cumulative impact related to substantial adverse**
30 **changes in the significance of a tribal cultural resource, defined in**
31 **Public Resources Code section 21074 as either a site, feature, place,**
32 **cultural landscape that is geographically defined in terms of the size**
33 **and scope of the landscape, sacred place, or object with cultural**
34 **value to a California Native American tribe, and that is:**

- 35 a) **Listed or eligible for listing in the California Register of**
36 **Historical Resources, or in a local register of historical**
37 **resources as defined in Public Resources Code section**
38 **5020.1(k), or**
39 b) **A resource determined by the lead agency, in its discretion**
40 **and supported by substantial evidence, to be significant**
41 **pursuant to criteria set forth in subdivision (c) of Public**
42 **Resources Code Section 5024.1. In applying the criteria set**
43 **forth in subdivision (c) of Public Resources Code Section**

1 **5024.1, the lead agency shall consider the significance of the**
2 **resource to a California Native American tribe?**

3 **Impacts of Past, Present, and Reasonably Foreseeable Future**
4 **Projects**

5 The land in and in the vicinity of the Port has been subject to extensive industrial,
6 residential, commercial, and infrastructure development over the past 150 years,
7 including, in the Port itself, dredging for channels and basins and filling for land creation
8 that has affected virtually all of the land in the Port. Archaeologists estimate that
9 development within urban areas, including the Project vicinity, have destroyed over 80%
10 of all prehistoric sites, meaning that the vast majority of the prehistoric record, i.e., the
11 physical record of Native American tribes, has already been lost. As a result of these
12 developments, most of the landforms that might have contained significant tribal cultural
13 resources have been substantially disturbed or destroyed, generally without proper
14 assessment and systematic collection of information and artifacts beforehand, resulting in
15 the loss of innumerable cultural resources related to the historic and prehistoric past of
16 the region's Native American tribes. Accordingly, the cumulative impact of past
17 development on tribal cultural resources has been substantial and is considered to be
18 significant. However, in view of the degree of past disturbance of the area's landforms,
19 the present and reasonably foreseeable related projects in Table 4-1 are unlikely to make
20 considerable contributions to that significant cumulative impact.

21 **Contribution of the Proposed Project**

22 As described in Section 3.4.4.3 (Impact CR-4), the project site consists largely of
23 imported/modern engineered fill material (i.e., dredged material) constructed in the early
24 twentieth century, has been extensively redeveloped over the years, and is not an upland
25 area. Accordingly, activities associated with construction and operation of the Proposed
26 Project would occur within the footprint of previous construction activity and therefore
27 would have little potential to disturb any cultural resources; furthermore, construction
28 would employ Special Condition CR-1 if cultural resources are encountered. Because
29 there would be little possibility of encountering tribal cultural resources during
30 construction of the Proposed Project, and no possibility during operation, the Proposed
31 Project would not make a cumulatively considerable contribution to a significant
32 cumulative impact under CEQA.

33 **Contribution of the Alternatives**

34 The No Project Alternative (Alternative 1) would not have any potential to contribute to a
35 significant impact under CEQA because no construction would occur; Alternative 1 is not
36 required to be evaluated under NEPA. Because construction of Alternative 2 would take
37 place on previously disturbed soils in the terminal's backlands and would not involve
38 substantial excavation, the potential for encountering tribal cultural resources would be
39 minimal; furthermore, construction would employ Special Condition CR-1 if cultural
40 resources are encountered. Accordingly, Alternative 2 would not make a cumulatively
41 considerable contribution to a significant cumulative impact under CEQA. Alternative 2
42 would result in no impact under NEPA because Alternative 2 is identical to the NEPA
43 baseline.

Mitigation Measures and Residual Cumulative Impacts

No mitigation is required because the Proposed Project and alternatives would not make a cumulatively considerable contribution to a significant cumulative impact.

4.2.5 Energy Conservation

Cumulative Impact EN-1: Would the Proposed Project make a cumulatively considerable contribution to a significant cumulative impact related to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Construction and operation of past, present, and reasonably foreseeable future projects has consumed and will continue to consume energy in the form of electricity, petroleum fuels, and natural gas. These demands are currently accommodated by existing facilities as provided by local refineries (for petroleum fuels), LADWP (for electricity), and the Southern California Gas Company (for natural gas). Many of the projects identified in Table 4-1, both inside the ports and in adjacent communities, involve new or expanded uses that have resulted or will result in additional demands on fuel, electricity, and natural gas.

In 2019, taxable gasoline sales in California, including aviation gasoline, totaled approximately 15.4 billion gallons and diesel sales totaled approximately 3 billion gallons of diesel fuel (CBE 2020a, b, although CARB [2020] estimates total usage of diesel in 2019 to be 4.5 billion gallons). Demand for gasoline is predicted to decline somewhat over the next 10 years and demand for diesel fuel will remain stable or increase slightly. Future related projects would be expected to reduce vehicular fuel use by encouraging the use of alternative modes of transportation and other project features. Because fuel use is not predicted to increase substantially, Southern California will have adequate fuel supplies to accommodate the related projects.

As described in Section 3.5.2.1, LADWP has a total generating capacity of about 8,000 MW to serve a peak Los Angeles-area demand of about 6,500 MW (LADWP 2021). The *Power Strategic Long-Term Resource Plan* (SLTRP; LADWP 2018) predicts that LADWP's overall system capacity is adequate to meet forecasted consumption, and overall consumption is actually forecasted to decrease somewhat through the current SLTRP planning horizon of 2040. Through implementation of strategies identified in the Power IRP, electricity resources and reserves at LADWP will adequately provide electricity for the study region.

Natural gas service to the region is supplied by the Southern California Gas Company (SCGC). As described in Section 3.5.2.2, demand is expected to be flat or to decline slightly for the next 15 years for a variety of reasons. SCGC has a capacity of approximately 3,435 million cubic feet per day (MMcf/day) whereas demand is predicted to be between 2,100 and 2,400 MMcf/day through 2035 (California Gas and Electric Utilities 2020).

As described above, adequate energy supplies exist to meet the demands of the related projects. Furthermore, the high cost of energy represents an incentive for construction and operational activities to use energy as efficiently as is consistent with project goals

1 and fiscal responsibility. Accordingly, there is no basis for concluding that the related
2 projects represent wasteful, inefficient, or unnecessary consumption of energy resources.
3 Therefore, past, present, and reasonably foreseeable future projects would not result in a
4 cumulatively significant impact related to energy use and conservation under CEQA or
5 NEPA.

6 **Contribution of the Proposed Project**

7 As described in Section 3.5.4.4, construction of the Proposed Project would not result in
8 substantial waste or unnecessary use of energy because construction is necessary to
9 achieve the overall project objective. Construction would be consistent with the policies
10 in the Port of Los Angeles' Sustainable Construction Guidelines, which include
11 provisions to reduce energy consumption, such as limiting idling and other measures.

12 Operation of the Proposed Project would consume more energy than under baseline
13 conditions, but, as described in Section 3.5.4.4, that energy would be used more
14 efficiently. Overall, the energy consumed per TEU of cargo is expected to decrease
15 somewhat over time as efficiency-increasing measures take effect. Although electrical
16 use per TEU would increase by somewhat less than 20%, fossil fuel use would decrease
17 by nearly 60%) in response to increasing energy costs and compliance with federal, state,
18 and local energy conservation programs.

19 Accordingly, operation of the Proposed Project would represent a more efficient use of
20 energy than baseline operations, and the Proposed Project would not result in a
21 cumulatively considerable contribution to a significant cumulative impact related to
22 energy demand or the efficient use of energy resources under CEQA or NEPA.

23 **Contribution of the Alternatives**

24 Alternative 1 would not involve construction, so there would be no consumption of
25 energy. As described in Section 3.5.4.4, operation of Alternative 1 would more numerous
26 and smaller vessels than the Proposed Project and train loading/unloading at the
27 intermodal facility would continue to be performed by mobile CHE, initially diesel-
28 powered until the transition to near-zero- and zero-emission CHE contemplated by the
29 CAAP were to be completed. None of the energy-saving mitigation measures that would
30 be applied to the Proposed Project could be applied to Alternative 1. Accordingly, energy
31 use per TEU of cargo would decline somewhat over time, but not to the extent of the
32 Proposed Project. Nevertheless, because Alternative 1 would not consume substantial
33 amounts of energy compared to regional supplies and would use energy more efficiently
34 in the future, Alternative 1 would not make a cumulatively considerable contribution to
35 an existing significant cumulative impact related to energy conservation under CEQA.
36 Alternative 1 is not required to be analyzed under NEPA

37 Alternative 2 would involve only minor construction (the expansion of the WBICTF
38 railyard and installation of electric-powered RMGs) and operational activities would
39 closely resemble those of Alternative 1. Accordingly, Alternative 2 would not make a
40 cumulatively considerable contribution to an existing significant cumulative impact
41 related to energy conservation under CEQA, and Alternative 2 would result in no impact
42 under NEPA because Alternative 2 is identical to the NEPA baseline.

43 **Mitigation Measures and Residual Cumulative Impacts**

44 No mitigation is required because the Proposed Project and alternatives would not make a
45 cumulatively considerable contribution to a significant cumulative impact.

1 **Cumulative Impact EN-2: Would the Proposed Project make a**
2 **cumulatively considerable contribution to a significant cumulative**
3 **impact related to conflict with or obstruction of a state or local plan**
4 **for renewable energy or energy efficiency?**

5 **Impacts of Past, Present, and Reasonably Foreseeable Future**
6 **Projects**

7 As described in Section 3.5.3, numerous federal, state, and local laws and regulations are
8 in place that are applicable to energy conservation and efficiency. These include
9 programs to increase the efficiency of energy use, such as vehicle fuel economy standards
10 and green building policies, and programs aimed at reducing dependency non-renewable
11 fuels by increasing reliance on renewable energy sources such as solar, wind, and
12 hydroelectric power. In particular, State of California goals for renewable energy, such as
13 the Renewable Portfolios Standard, SB 350, and SB 100 set aggressive goals for
14 decreasing reliance on fossil fuels, and Executive Order N-79-20 sets an aggressive goal
15 for zero-emissions vehicle sales. Some of the federal and state requirements have been in
16 place for 20 years, although most, particularly the most ambitious sustainability
17 requirements, are more recent. Accordingly, past projects constructed in the vicinity of
18 the ports in recent years have incorporated at least some energy-related program
19 requirements, and current and reasonably foreseeable projects incorporate even more
20 energy-efficiency and sustainability features.

21 Most of the related projects in Table 4-1 are projects undertaken by the ports of Los
22 Angeles and Long Beach or other governmental agencies. Construction of those projects
23 would conform to the requirements of those agencies' policies and guidelines such as
24 LEED standards, green building policies, and sustainable construction guidelines.
25 Operation of the related projects would, in accordance with the relevant leases and
26 permits, be required to comply with a variety of federal, state, and local programs and
27 initiatives that promote or have a side benefit of increased fuel efficiency and increased
28 use of renewable and sustainable energy sources (see Section 3.5.3). Accordingly, past,
29 present, and reasonably foreseeable future projects would not result in a cumulatively
30 significant impact related to conflicts with energy policies.

31 **Contribution of the Proposed Project**

32 Construction of the Proposed Project would comply with the LAHD's Sustainable
33 Construction Guidelines, which incorporate the requirements of federal, state, and local
34 programs aimed at fuel economy for heavy equipment, the City's Green LA initiative and
35 Executive Order 10, and the Port's Green Building Program. Operation of the Proposed
36 Project would be consistent with the goals, standards, and suggested control measures of
37 the state and local regulations and programs described in Section 3.5.3, particularly
38 CARB's mobile source strategy and In-Use Off-Road Diesel-Fueled Fleets regulation,
39 Executive Order N-79-20, the Green LA/Sustainable City pLAN, and the CAAP's goals
40 for zero-emissions technology. Accordingly, the Proposed Project would not have a
41 significant impact and would not result in a cumulatively considerable contribution to a
42 significant cumulative impact related to conflict with federal, state, or local plans for
43 energy efficiency and renewable energy under CEQA or NEPA.

44 **Contribution of the Alternatives**

45 The alternatives would be required to comply with the energy policies and plans
46 described for the Proposed Project, except that Alternative 1 would not involve any

1 construction. Alternative 1's achievement of goals related to renewable energy and zero-
2 emissions technology would be slower than that of the Proposed Project and Alternative
3 2 because the mitigation measures related to those issues (e.g., MMs AQ-1 through MM
4 AQ-9 and lease measures LM AQ-1 and LM AQ-2) could not be imposed on Alternative
5 1. Nevertheless, because the alternatives would not conflict with federal, state, and local
6 plans, they would not result in a cumulatively considerable contribution to a significant
7 cumulative impact related to conflict with federal, state, or local plans for energy
8 efficiency and renewable energy under CEQA. Alternative 1 is not required to be
9 analyzed under NEPA. Alternative 2 would result in no impact under NEPA because
10 Alternative 2 is identical to the NEPA baseline.

11 **Mitigation Measures and Residual Cumulative Impacts**

12 No mitigation is required because the Proposed Project and alternatives would not make a
13 cumulatively considerable contribution to a significant cumulative impact.

14 **4.2.6 Greenhouse Gas Emissions**

15 Scientific evidence indicates a trend of warming global surface temperatures over the past
16 century due at least partly to the generation of greenhouse gas (GHG) emissions from
17 human activities, as further discussed in Section 3.6 of this Draft EIR, Greenhouse Gas
18 Emissions. Some observed changes include shrinking glaciers, thawing permafrost, and
19 shifts in plant and animal ranges. Credible predictions of long-term impacts from
20 increasing GHG levels in the atmosphere include sea level rise, changes to weather
21 patterns, changes to local and regional ecosystems including the potential loss of species,
22 and significant reductions in winter snowpacks. These and other effects could have
23 environmental, economic, and social consequences on a global scale. Emissions of GHGs
24 contributing to global climate change are attributable in part to human activities
25 associated with the industrial/manufacturing, utility, transportation, residential, and
26 agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to
27 global climate change can be attributed to every nation, region, and city, and virtually
28 every individual on Earth. As described in Section 3.2.2.1, substantial increases in CO₂
29 emissions and thus substantial increases in global atmospheric CO₂ concentrations (the
30 major component of greenhouse gases) have occurred over the last century. In 2022, the
31 atmospheric CO₂ concentration peaked at 421 parts per million (ppm), exceeding the
32 natural range over the last 800,000 years (NOAA 2022). The buildup of CO₂ in the
33 atmosphere is a result of increased emissions and its relatively long lifespan in the
34 atmosphere of 50 to 200 years (NOAA 2022). In California alone, CO_{2e} emissions
35 totalled approximately 448.11 million metric tons or 0.5 gigatonnes in 2011 (CARB
36 2017).

37 GHGs differ from criteria pollutants in that GHG emissions do not cause direct adverse
38 human health effects. Rather, their indirect impacts to human health via global warming
39 is a cause for concern. Elevated atmospheric temperatures are likely to contribute to the
40 increased occurrence of extreme weather events such as heat waves and precipitation
41 events. Rising temperatures related to human activities likely contributed to Arctic sea-
42 ice loss, an increase in upper ocean temperature, and global sea level rise (SLR) during
43 the latter half of the 20th century. As a result of continued growing concentrations of
44 GHGs in the atmosphere, the trends observed in the past century such as oceanic
45 warming and acidification, are expected to occur at a faster pace in the 21st century.
46 (IPCC 2013, 2014, 2023).

1 **Cumulative Impact GHG-1: Would the Proposed Project or**
2 **alternatives generate GHG emissions, either directly or indirectly,**
3 **that would make a cumulatively considerable contribution to a**
4 **significant cumulative impact?**

5 **Impacts of Past, Present, and Reasonably Foreseeable Future**
6 **Projects**

7 Past, present, and reasonably foreseeable future projects in the area (Table 4-1) have
8 generated and will continue to generate GHGs from the combustion of fossil fuels and the
9 use of coatings, solvents, refrigerants, and other products. Current and future projects will
10 incorporate a variety of GHG reduction measures in response to federal, state, and local
11 mandates and initiatives, and these measures are expected to reduce GHG emissions from
12 future projects. For example, the adjacent Project #6 (Berths 97-107 [China Shipping]
13 Container Terminal Project) and nearby project #'s 1, 3, 11, 24, and 26 involving break
14 bulk, dry bulk, and liquid bulk marine terminals would likely generate GHG emissions
15 from vessels, drayage trucks, cargo handling equipment, and rail operations. The 2017
16 CAAP Update includes GHG emission reduction targets from port-related sources at 40%
17 below 1990 levels by 2030 and 80% below 1990 levels by 2050. As reported in the Port's
18 2023 Emissions Inventory (LAHD 2024), progress on the CAAP measures has been
19 tracked since 2005. Due to the many emission reduction measures undertaken by the
20 Port, as well as statewide and federal regulations and standards, GHG emissions have
21 declined. As reported in 2023, GHG emissions (measured as CO₂e in metric tons) has
22 declined by 24% since 2005, 14% since the 2017 CAAP update, and 20% over the prior
23 year in 2022. However, because of the long-lived nature of GHGs in the atmosphere and
24 the global nature of GHG emissions impacts, no specific quantitative level of GHG
25 emissions from related projects in the region or state-wide has been identified below
26 which no impacts would occur. It is therefore conservatively assumed that the related
27 projects represent a significant cumulative impact.

28 **Contribution of the Proposed Project (Prior to Mitigation)**

29 The challenge in assessing the significance of an individual project's contribution to
30 global GHG emissions and associated global climate change impacts is to determine
31 whether a project's GHG emissions, which are at a micro-scale relative to global
32 emissions, make a cumulatively considerable incremental contribution to a macro-scale
33 impact. SCAQMD developed a project-level significance threshold for GHGs of 10,000
34 metric tons of CO₂e per year for industrial facilities. For the purposes of this cumulative
35 discussion, it is conservatively assumed that an exceedance of the SCAQMD project-
36 level threshold would result in a cumulatively considerable contribution to the overall
37 GHG burden.

38 Impacts of the Proposed Project would exceed SCAQMD's threshold in analysis years
39 2028 through 2062. The Proposed Project's impacts would combine with impacts from
40 related projects, which would already be cumulatively significant. As a result, without
41 mitigation, impacts from construction and operation of the Proposed Project would make
42 a cumulatively considerable contribution to an existing significant cumulative impact
43 related to GHG and global climate change under CEQA.

44 As explained in Section 3.6, a significance determination regarding GHG emissions is not
45 made under NEPA.

1 **Contribution of the Alternatives**

2 GHG emissions from Alternative 1 (operational) and Alternative 2 (construction and
3 operational) would exceed the SCAQMD GHG significance thresholds under CEQA.
4 Those impacts would combine with impacts from related projects, which would already
5 be cumulatively significant. As a result, without mitigation, impacts from Alternatives 1
6 and 2 would make a cumulatively considerable contribution to an existing significant
7 cumulative impact related to GHG and global climate change under CEQA. A
8 significance determination regarding GHG emissions is not made under NEPA.

9 **Mitigation Measures and Residual Cumulative Impacts**

10 As a significance determination regarding GHG emissions is not made under NEPA, the
11 following discussion is applicable only to CEQA. As described in Section 3.6,
12 Greenhouse Gases, mitigation measure MM GHG-1 (LED Lighting) and the construction
13 and operational measures designed to mitigate air quality impacts (i.e., MM AQ-2
14 through MM AQ-6, MM AQ-8, through MM AQ-10, and lease measures LM AQ-1 and
15 LM AQ-2) would reduce future emissions of GHG; those measures are summarized in
16 Cumulative Impact AQ-1 and AQ-3, above, and described in Section 3.2.

17 After application of those measures, the Proposed Project's emissions would be reduced
18 but would continue to exceed the significance threshold. Accordingly, this Draft EIS/EIR
19 includes MM GHG-2 (GHG Reduction Offsets, described in Section 3.6), which requires
20 the tenant to purchase and retire GHG offsets in an amount that would be the equivalent
21 of the Project's net GHG emissions each year (i.e., emissions exceeding the SCAQMD
22 threshold of 10,000 tons per year). The credits must be purchased from a CARB-
23 approved registry or an LAHD Greenhouse Gas Program. With implementation of MM
24 GHG-2, the Proposed Project would not make a considerable contribution to a significant
25 cumulative impact.

26 Mitigation is not applicable under Alternative 1 because there would be no discretionary
27 action under CEQA; accordingly, Alternative 1 would continue to make a considerable
28 contribution to a significant cumulative impact under CEQA.

29 The mitigation measures applied to the Proposed Project would also be applied to
30 Alternative 2. Accordingly, as with the Proposed Project, Alternative 2 would not make a
31 considerable contribution to a significant cumulative impact.

32 **4.2.7 Hazards and Hazardous Materials**

33 **4.2.7.1 Scope of Analysis**

34 The geographic scope for cumulative impacts associated with accidental spills, releases,
35 or explosions of hazardous materials encompasses the overall Port Complex. The
36 importance of regional projects diminishes as distance away from the Port Complex
37 increases because the magnitude of potential impacts diminishes with greater distance
38 from the Port Complex. Thus, past, present, and reasonably foreseeable future projects
39 that could contribute to these cumulative impacts include those projects that transport
40 hazardous materials in the vicinity of the Port Complex.

41 The significance criteria used for the cumulative analysis are the same as those used for
42 the Proposed Project and alternatives in Section 3.7. These criteria are the same for both
43 CEQA and NEPA impact analyses.

1 **Cumulative Impact RISK-1: Would the Proposed Project or**
2 **alternatives make a cumulatively considerable contribution to a**
3 **significant cumulative impact related to hazards to the public or the**
4 **environment through the routine transport, use, or disposal of**
5 **hazardous materials?**

6 **Impacts of Past, Present, and Reasonably Foreseeable Future**
7 **Projects**

8 All projects within the study area are required to comply with applicable regulations and
9 policies governing the transport, use, and storage of hazardous materials. For example, all
10 construction would be completed in accordance with RCRA, CERCLA, CCR Title 22
11 and Title 26, and the California Hazardous Waste Control Law, which would govern
12 proper containment, spill control, and disposal of hazardous waste generated during
13 construction activities. Potential releases of hazardous substances during construction
14 would be addressed through the federal Emergency Planning and Right-to-Know Act,
15 which is administered in California by SERC, and the Hazardous Material Release
16 Response Plans and Inventory Law. In addition, construction would be completed in
17 accordance with the Los Angeles Municipal Fire Code (LAFD), which regulates the
18 construction of buildings and other structures used to store flammable hazardous
19 materials, and LAMC (Public Works and Property), which regulates the discharge of
20 materials into the sanitary sewer and storm drain.

21 To the extent that the related projects in Table 4-1 handle hazardous substances, such as
22 petroleum products, industrial chemicals, and explosive or flammable gases, there is the
23 possibility that the public could be exposed during the use, transport, and disposal of such
24 materials. Several of the related projects in Table 4-1, including liquid bulk marine
25 terminals in both ports and refinery and chemical plant projects in the region, store,
26 handle, and transport large quantities of hazardous materials. Existing safeguards, such as
27 design and operational requirements for process equipment and infrastructure, operational
28 procedures, US DOT packaging and labelling requirements for transport (see Section
29 3.7.3), hazardous materials business plans, and BMPs for construction and operation limit
30 the possibility of exposure during routine operations; exposure would typically occur in
31 the event of an upset or accident (see Impact HAZ-2, below).

32 Other related projects, including container terminals such as the Berths 121-131
33 Terminal, handle hazardous materials as containerized cargo or in small quantities for
34 operational and construction-related needs. These materials are typically maintained on-
35 site, so that the potential for the public to be exposed during routine operations is small.
36 For Port projects, LAHD maintains compliance with these federal, state, and local laws
37 through a variety of methods, including internal compliance reviews, preparation of
38 regulatory plans, and agency oversight. All projects are also required to be consistent
39 with the PMP or be subject to approved amendments to the PMP. Therefore, the past,
40 present, and foreseeable future projects would not result in a significant cumulative
41 impact under CEQA or NEPA.

42 **Contribution of the Proposed Project**

43 As described in Section 3.7.4 (Impact HAZ-1), hazardous materials at the Proposed
44 Project would be shipped, transported, handled, or otherwise stored would comply with
45 the RMP, USCG regulations, fire department requirements, and state and federal
46 departments of transportation regulations. Thus, the potential for the public or the
47 environment to be exposed to hazardous materials in the course of the routine use and

1 transport of such materials is insubstantial, and construction and operation of the
2 Proposed Project would not be expected to make a cumulatively considerable
3 contribution to a significant cumulative impact relative to hazardous substances exposure
4 risk under CEQA and NEPA.

5 **Contribution of the Alternatives**

6 Alternative 1 (No Project) would not involve construction but would result in a
7 substantial increase in cargo throughput. The same safeguards described for the Proposed
8 Project would regulate the activities of the Berths 121-131 Terminal under Alternative 1;
9 accordingly, operation of Alternative 1 would not make a cumulatively considerable
10 contribution to a significant cumulative impact relative to hazardous substances exposure
11 risk under CEQA. Alternative 2 (No Federal Action) would be very similar to Alternative
12 1 except for the minor construction associated with the expanded WBICTF on-dock
13 railyard. Accordingly, Alternative 2 would not make a cumulatively considerable
14 contribution to a significant cumulative impact under CEQA related to exposure under
15 CEQA. Alternative 1 is not required to be analyzed under NEPA, and Alternative 2
16 would result in no impacts under NEPA because it is identical to the NEPA baseline.

17 **Mitigation Measures and Residual Cumulative Impacts**

18 No mitigation is required because the Proposed Project and alternatives would not make a
19 cumulatively considerable contribution to a significant cumulative impact.

20 **Cumulative Impact RISK-2: Would the Proposed Project or** 21 **alternatives make a cumulatively considerable contribution to a** 22 **significant cumulative impact related to hazards to the public or the** 23 **environment through reasonably foreseeable upset and accident** 24 **conditions involving the release of hazardous materials into the** 25 **environment?**

26 **Impacts of Past, Present, and Reasonably Foreseeable Future** 27 **Projects**

28 As described in Section 3.7.2.1, spill notification data available on the Governor's Office
29 of Emergency Services website (CalOES 2024) indicate that approximately 11 hazardous
30 material spills known to be greater than 1 gallon occurred in Los Angeles Harbor
31 between 2016 and 2020. The spills include fuel and other substances spilled from vessels
32 serving the terminals, as well as cargo and on-site stores of maintenance materials. No
33 deaths have resulted from releases of hazardous materials at the Port, and there were no
34 reported injuries, or evacuations to the general public or employees directly from a
35 hazardous material spill. During the period 2016 - 2019, the total throughput of the
36 container terminals at the Port of Los Angeles was 35,501,356 TEUs (POLA 2021).
37 Therefore, the probability of a spill involving a hazardous material at a container terminal
38 can be estimated at 3×10^{-7} per TEU per TEU (approximately 1 in 3 million, a
39 conservative estimate because it includes spills not involving containers or container
40 terminal operations).

41 As cargo volumes grow, the past, present, and reasonably foreseeable future projects
42 listed in Table 4-1 involved in goods movement have generated and would continue to
43 generate truck and train trips that travel through the Port and surrounding communities,
44 which could increase health hazards to the public through accidents and releases of
45 hazardous materials. Those increases are not expected to result in substantial increases in

1 the probable frequency and/or severity of consequences because of increasing vehicle
2 safety, weight and speed limits, designated truck routes, and cargo packaging and
3 labeling requirements. In addition, LAHD and the Port of Long Beach are working on
4 several strategies to increase rail transport, which will reduce reliance on trucks, and to
5 improve truck safety. For example, the Clean Truck Program phases out older trucks, and
6 the Transportation Worker Identification Credential (TWIC) program helps identify and
7 exclude truck drivers who lack the proper licensing and training. Similar programs at
8 other facilities that handle hazardous materials in the area will improve the safety of those
9 operations, as well. Operational activities of the related projects would not expose the
10 public to health hazards other than the potential for releases and spills during truck and
11 rail transport considered above. Hazardous material storage and handling are subject to
12 extensive controls, as described in Sections 3.7.2 and 3.7.3, which substantially decreases
13 the potential for exposure to health hazards. Accordingly, the cumulative impacts of
14 operation of the related projects are considered less than significant.

15 Past, present, and reasonably foreseeable projects would be constructed in accordance
16 with the regulations and policies discussed in Section 3.7.3, which would reduce the
17 frequency and consequences of construction-related spills and releases. Construction-
18 related spills are not uncommon, but because such spills are typically short-term,
19 localized, and involve petroleum products rather than toxic chemicals (Section 3.7.4.3),
20 their potential consequences to people are slight. There is also the potential for release of
21 contaminated soils from excavations. Contaminated soil or groundwater is handled,
22 transported, remediated, or disposed of in accordance with all applicable federal, state,
23 and local laws and regulations and in accordance with the regulatory lead agency (e.g.,
24 DTSC, LARWQCB) and LAHD requirements pertaining to site remediation and
25 development of a contamination contingency plan. As a consequence, construction of the
26 related projects would not result in substantial increases in the frequency or severity of
27 hazardous materials spills and would therefore not result in significant cumulative
28 impacts.

29 Based on these considerations, the related projects would not be expected to result in a
30 significant cumulative impact related to an increase in the probable frequency and
31 severity of harm from truck accidents.

32 **Contribution of the Proposed Project**

33 As described in Section 3.8.4.3, construction of the Proposed Project would be conducted
34 using BMPs in accordance with City guidelines and the SWPPP required by the State
35 General Permit for Storm Water Discharges Associated with Construction Activity.
36 These, along with federal and state regulations that govern the storage and handling of
37 hazardous materials and the cleanup of spills (Section 3.7.3), would minimize the
38 potential for an accidental release of petroleum products or hazardous materials and
39 explosion during construction and would confine the adverse effects of any releases that
40 did occur to a small area. Accordingly, construction of the Proposed Project would not
41 substantially increase the probable frequency and/or severity of consequences to people
42 from exposure to health hazards.

43 The Proposed Project's throughput would increase to 1,871,000 TEUs per year from the
44 baseline of 354,000; the probability of spills both in the terminal and on highways and
45 rail lines used by trucks and trains would rise proportionately. Berths 121-131 Terminal
46 operations would continue to be subject to safety regulations that govern the shipping,
47 transport, storage, and handling of hazardous materials, which would limit the severity
48 and frequency of potential releases of hazardous materials resulting in increased exposure

1 of people to health hazards (i.e., LAFD, Port RMP, USCG, and LAFD regulations and
2 requirements, and USDOT regulations). Implementation of increased hazardous materials
3 inventory control and spill prevention controls associated with these regulations would
4 limit both the frequency and severity of potential releases of hazardous materials.

5 Given the controls in place to reduce the likelihood of accidents that would release
6 hazardous materials, and the controls in place to reduce the severity of releases that do
7 occur, the Proposed Project would not make a cumulatively considerable contribution to
8 a significant cumulative impact on the probable frequency and severity of consequences
9 to people under CEQA or NEPA.

10 **Contribution of the Alternatives**

11 For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would
12 not be expected to make a cumulatively considerable contribution to a significant
13 cumulative impact under CEQA related to risks during construction. Alternative 1 is not
14 required to be analyzed under NEPA, and Alternative 2 would result in no impacts under
15 NEPA.

16 **Mitigation Measures and Residual Cumulative Impacts**

17 No mitigation is required because the Proposed Project and alternatives would not make a
18 cumulatively considerable contribution to a significant cumulative impact.

19 **Cumulative Impact RISK-3: Would the Proposed Project or** 20 **alternatives make a cumulatively contribution to a significant impact** 21 **related to hazardous emissions or handling of hazardous or acutely** 22 **hazardous materials, substances, or waste within one-quarter mile of** 23 **an existing or proposed school?**

24 **Impacts of Past, Present, and Reasonably Foreseeable Future** 25 **Projects**

26 None of the related projects within the two ports are within one-quarter mile of an
27 existing or proposed school. However, some of the projects and facilities outside the
28 ports that would handle and/or emit hazardous materials may be located within one-
29 quarter mile of schools (e.g., refinery and petrochemical plant projects in the South Bay
30 region). Those facilities operate in compliance with permits issued by the appropriate
31 regulatory agencies (e.g., SCAQMD, Cal EPA, LAFD). Those permit conditions are
32 designed to be protective of human health and the environment under normal operating
33 conditions. Accordingly, the routine handling of hazardous materials at, and permitted
34 emissions by, the related projects do not represent a significant cumulative impact.

35 **Contribution of the Proposed Project**

36 The Proposed Project would not be located within one-quarter mile of any existing or
37 proposed school (see Section 3.7.4.3). Therefore, the Proposed Project would not make a
38 cumulatively considerable contribution to a significant cumulative impact under CEQA
39 or NEPA.

40 **Contribution of the Alternatives**

41 For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would
42 not make a cumulatively considerable contribution to a significant cumulative impact

1 under CEQA. Alternative 1 is not required to be analyzed under NEPA, and Alternative 2
2 would result in no impacts under NEPA because it would be identical to the NEPA
3 baseline.

4 **Mitigation Measures and Residual Cumulative Impacts**

5 No mitigation is required because the Proposed Project and alternatives would not make a
6 cumulatively considerable contribution to a significant cumulative impact.

7 **Cumulative Impact RISK-4: Would the Proposed Project or** 8 **alternatives make a cumulatively considerable contribution to a** 9 **significant cumulative impact related to hazards to the public or the** 10 **environment as a result of being located on a site which is included** 11 **on a list of hazardous materials sites compiled pursuant to** 12 **Government Code Section 65962.5?**

13 **Impacts of Past, Present, and Reasonably Foreseeable Future** 14 **Projects**

15 The related projects in Table 4-1 include a number of refineries, existing and former
16 liquid bulk marine terminals, sites underlain by pipelines, chemical facilities, and other
17 sites contaminated by hazardous materials. Some of those sites are on at least one of the
18 databases that comprise the Cortese list; for example, the Shell Marine Oil Terminal
19 Wharf Improvements Project (# 24) appears on Geotracker (CalEPA 2024) as an active
20 cleanup program. In addition, Geotracker indicates approximately 100 closed cleanup
21 program sites in San Pedro, Wilmington, and Carson. The hazards to the public from
22 these sites cannot be accurately assessed, and to be conservative this analysis assumes
23 that the past, present, and reasonably foreseeable projects could represent a significant
24 cumulative impact under CEQA or NEPA.

25 **Contribution of the Proposed Project**

26 As described in Section 3.7.4.3, the Project site is not on any list of hazardous materials
27 sites, including the Cortese list. Accordingly, the Proposed Project would not make a
28 cumulatively considerable contribution to a significant cumulative impact, under CEQA
29 or NEPA, related to sites on the Cortese list.

30 **Contribution of the Alternatives**

31 For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would
32 not make a cumulatively considerable contribution to a significant cumulative impact
33 under CEQA related to sites on the Cortese list. Alternative 1 is not required to be
34 analyzed under NEPA, and Alternative 2 would result in no impacts under NEPA
35 Because it is identical to the NEPA baseline.

36 **Mitigation Measures and Residual Cumulative Impacts**

37 Neither the Proposed Project nor any alternative would make a cumulatively considerable
38 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
39 mitigation measures would be required.

40 **Cumulative Impact RISK-5: Would the Proposed Project or** 41 **alternatives make a cumulatively considerable contribution to a** 42 **significant cumulative impact related to impairment of the**

1 **implementation of or physical interference with adopted emergency**
2 **response plans or emergency evacuation plans?**

3 **Impacts of Past, Present, and Reasonably Foreseeable Future**
4 **Projects**

5 Emergency response and evacuation planning in the Port is a shared responsibility among
6 LAPD, LAFD, Los Angeles Port Police, and USCG. Outside the Port, other agencies,
7 including the Los Angeles County Fire Department, and the corresponding Long Beach
8 safety and emergency response agencies. As standard procedure, construction and
9 operation of the related projects involve approval by and coordination with those
10 agencies (Section 3.7.2). Therefore, the related projects would not result in significant
11 cumulative impacts related to emergency response or evacuation plans under CEQA and
12 NEPA.

13 **Contribution of the Proposed Project**

14 As discussed in Section 3.7.4.3, project construction would occur primarily on site or
15 within the immediate vicinity of the terminal's gates and is not expected to interfere with
16 emergency responses or evacuation plans. Proposed Project operations would also be
17 subject to emergency response and evacuation systems implemented by LAFD and the
18 Port Police, which would review all plans to ensure that adequate access in the vicinity of
19 the Proposed Project is maintained. Terminal operations would not interfere with any
20 existing contingency plans because operations would be confined to the project site and
21 designated truck and rail routes. The existing oil spill contingency and emergency
22 response plans for the Berths 121-131 Terminal would be updated to incorporate any
23 operational changes. Therefore, the Proposed Project would not make a cumulatively
24 considerable contribution to a significant cumulative impact related to emergency
25 response and evacuation plans under CEQA and NEPA.

26 **Contribution of the Alternatives**

27 For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would
28 not be expected to make a cumulatively considerable contribution to a significant
29 cumulative impact under CEQA. Alternative 1 is not required to be analyzed under
30 NEPA and Alternative 2 would result in no impacts under NEPA because it is identical to
31 the NEPA baseline.

32 **Mitigation Measures and Residual Cumulative Impacts**

33 No mitigation is required because the Proposed Project and alternatives would not make a
34 cumulatively considerable contribution to a significant cumulative impact.

35 **4.2.8 Land Use**

36 **4.2.8.1 Scope of Analysis**

37 Because the Proposed Project has the capacity to affect the environment within the Port
38 and surrounding communities, the region of analysis for cumulative land use impacts
39 includes the Port and extends to adjacent areas, including the communities of Wilmington
40 and San Pedro, and into the Port of Long Beach (Figure 4-1). The Wilmington and San
41 Pedro communities are assessed in terms of their compatibility with the already existing
42 Port industrial uses.

1 **Cumulative Impact LU-1: Would the Proposed Project or alternatives**
2 **make a cumulatively considerable contribution to a significant**
3 **cumulative impact related to dividing an established community?**

4 **Impacts of Past, Present, and Reasonably Foreseeable Future**
5 **Projects**

6 Most of the related projects in table 4-1 are limited in their extent, being developments on
7 existing plots. However, linear projects, such as transportation projects (e.g., freeways
8 and rail lines) have, by their nature, the potential to divide established communities.
9 None of the related projects have that potential. The transportation projects (e.g., SR-
10 47/Vincent Thomas Bridge & Front St./Harbor Blvd. Interchange Reconfiguration [#18],
11 Avalon and Fries Street Segments Closure Project [#25], and Pier B Rail Support Yard
12 [#28]) either replace or modify existing infrastructure or are located on industrial land
13 rather than in communities. Furthermore, all of the related projects have been or will be
14 developed in accordance with the land use designations in each jurisdiction's master plan
15 and applicable city zoning designations and with permits and entitlements from the
16 government agencies that implement community plans in their jurisdictions. Accordingly,
17 the related projects do not have a significant cumulative impact with respect to dividing
18 existing communities.

19 **Contribution of the Proposed Project**

20 As stated in Section 3.8.4.3, the Proposed Project would improve an existing marine
21 container cargo terminal and would not include additional elements that could divide the
22 surrounding Wilmington or San Pedro communities. All construction and operational
23 activities would take place within the existing container terminal. Accordingly, the
24 Proposed Project would have no adverse effects on land use plans or zoning designation
25 consistency and thus would not make a cumulatively considerable contribution to a
26 significant cumulative land use impact under CEQA and NEPA.

27 **Contribution of the Alternatives**

28 For the same reasons as described for the Proposed Project, Alternatives 1 (No Project)
29 and 2 (No Federal Action) would not make a cumulatively considerable contribution to a
30 significant cumulative impact under CEQA with regard to land use plan consistency.
31 Alternative 1 is not required to be analyzed under NEPA, and Alternative 2 would result
32 in no impacts under NEPA because it is identical to the NEPA baseline.

33 **Mitigation Measures and Residual Cumulative Impacts**

34 Neither the Proposed Project nor any alternative would make a cumulatively considerable
35 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
36 mitigation measures would be required.

37 **Cumulative Impact LU-2: Would the Proposed Project or alternatives**
38 **make a cumulatively considerable contribution to a significant**
39 **cumulative impact related to conflict with any land use plan, policy,**

1 **or regulation adopted for the purpose of avoiding or mitigating an**
2 **environmental impact?**

3 **Impacts of Past, Present, and Reasonably Foreseeable Future**
4 **Projects**

5 Past projects in the region of analysis have been subject to the goals and objectives
6 delineated in the Port of Los Angeles Plan, the PMP, and the respective land use plan.
7 The City-approved Port of Los Angeles Plan is the governing document that regulates the
8 continued development and operation of the Port and is consistent with the PMP. Over
9 the years, the Port has developed consistent with the Port of Los Angeles Plan objectives
10 that give priority to water-dependent developments to ensure the Port is maintained as an
11 important local, regional, and national resource, as well as coordinating development of
12 the Port and adjacent communities as stipulated in the Wilmington-Harbor City
13 Community Plan and the San Pedro Community Plan. Similarly, present projects within
14 the vicinity of the Proposed Project have been developed to ensure proposed
15 developments are consistent with Port of Los Angeles Plan, PMP, and/or applicable land
16 use plan policies. Accordingly, past, present, and reasonably foreseeable future projects
17 would not result in a significant cumulative impact related to plan inconsistencies.

18 **Contribution of the Proposed Project**

19 As stated in Section 3.8.4.3, the Proposed Project would be consistent with the adopted
20 objectives and policies identified in the General Plan and adopted environmental goals or
21 policies contained in other applicable plans. The proposed improvements would be
22 consistent with the Port Master Plan, which listed this Proposed Project as a proposed
23 project under the PMP (LAHD 2018). Additionally, the Proposed Project would be
24 consistent with adopted, Port-related objectives, policies, and applicable plans contained
25 in the City of Los Angeles General Plan (by way of consistency with the PMP and the
26 San Pedro and Wilmington-Harbor City Community Plans), and with the uses identified
27 in the Coastal Act, SCAG policies including the RCP and RTP, and the CAAP. Because
28 the Proposed Project would be consistent with adopted environmental goals and policies
29 contained in applicable plans, it would not make a cumulatively considerable contribution
30 to a significant cumulative impact under CEQA or NEPA.

31 **Contribution of the Alternatives**

32 For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would
33 not make a cumulatively considerable contribution to a significant cumulative impact
34 under CEQA related to land use plan consistency. Alternative 1 is not required to be
35 analyzed under NEPA, and Alternative 2 would result in no impacts under NEPA
36 because it is identical to the NEPA baseline.

37 **Mitigation Measures and Residual Cumulative Impacts**

38 Neither the Proposed Project nor any alternative would make a cumulatively considerable
39 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
40 mitigation measures would be required.

1 **4.2.9 Noise**

2 **4.2.9.1 Scope of Analysis**

3 For the purposes of cumulative noise impact analysis, the area of influence includes those
4 sensitive receptors closest to the project site that might be affected by construction noise
5 or noise associated with traffic generated by the Proposed Project or an alternative, as
6 well as sensitive receptors along major transportation corridors serving the project area.
7 Noise-sensitive receptors include residences, schools, a training /community center, and
8 public parks. The nearest sensitive receptors to the Project site include a residential area
9 along Gaffey Street, located about 0.2 mile west of the project site, a residential area on
10 Knoll Hill, one mile south of the site, and residences in Wilmington, approximately 0.8
11 mile north of the project site (Figure 3.9-2). The nearest parks are a baseball field on
12 Knoll Hill, the Field of Dreams soccer facility just west of the project site, and
13 Wilmington Waterfront Park, along Harry Bridges Boulevard, 0.5 mile north of the site.
14 The Harbor Occupational Center (a community/training center) is located southwest of
15 the project site. None of those sensitive uses is within 500 feet of the Project site.

16 When considering cumulative impacts, not all of the related projects are close enough to
17 the Proposed Project to contribute to noise levels at sensitive receivers, so they can be
18 ruled out from further consideration. The noise level that results from distant projects is
19 diminished by geometric spreading, ground attenuation, and line-of-sight obstructions, as
20 explained in Section 3.9.1.1. Projects are considered to be too far away when the impacts
21 that they would have on the cumulative noise level in the project area are too small to
22 cause a substantial increase in the cumulative noise level.

23 This analysis assesses the potential of the Proposed Project along with other past, present,
24 and reasonably foreseeable future projects to cause a substantial increase in noise from
25 construction and operational activities (including on-terminal operations and increased
26 truck traffic noise).

27 **Cumulative Impact NOI-1: Would the Proposed Project or**
28 **alternatives result in generation of a substantial temporary or**
29 **permanent increase in ambient noise levels in the vicinity of the**
30 **project that would result in a cumulatively considerable exceedance**
31 **of standards established in the local general plan or noise ordinance,**
32 **or applicable standards of other agencies?**

33 **Impacts of Past, Present, and Reasonably Foreseeable Future**

34 **Projects**

35 The Proposed Project would be constructed over an approximately 24-month schedule,
36 assumed to begin in 2026. The related projects (Table 4-1) were reviewed to determine if
37 any projects in the vicinity of the sensitive receptors described above would be under
38 construction at the same time as the Proposed Project; in such a case, construction
39 activities could, in combination with those of the Proposed Project, cause a cumulative
40 construction noise impact on sensitive receptors (i.e., residences on Knoll Hill and near
41 the West Basin, including in Wilmington).

42 In the general vicinity of those receptors (i.e., within one mile), related projects that could
43 potentially be under construction during 2026 through 2028 include the Wilmington
44 Waterfront Plan (#7), SR-47/Vincent Thomas Bridge & Front St./Harbor Blvd.

1 Interchange Reconfiguration (#18), Berths 167-169 [Shell] Marine Oil Terminal Wharf
2 Improvements Project (#24), and the John S. Gibson Truck and Chassis Parking Lot
3 Project (#38). All other related projects within one mile of the Project site and the
4 sensitive receptors have been completed or do not have reasonably foreseeable
5 construction dates. It is likely that construction activities and associated noise levels of
6 these related projects would be similar to those expected from the equipment necessary to
7 construct the Proposed Project. However, only one of the related projects (#24) would
8 involve pile driving (the noisiest of the construction activities) and it is located a full mile
9 from the Project site and well inside an industrial area. Accordingly, the related projects
10 would not represent a significant cumulative impact with respect to construction noise.

11 Noise from operation of the related projects in the vicinity of the Project site would be
12 generated primarily by vehicular traffic. As described in Section 3.9.2.3, existing ambient
13 noise at several locations in the general vicinity of the Project site exceeds 70 dBA,
14 which is considered normally unacceptable by the City of Los Angeles. Accordingly,
15 although individually the related projects would not contribute substantially to that
16 ambient noise, this EIS/EIR assumes that a significant cumulative impact with respect to
17 operational noise exists.

18 **Contribution of the Proposed Project**

19 As described in Section 3.9.4.3 (tables 3.9-10 through 3.8-12), construction of the
20 Proposed Project would not cause exceedances of noise thresholds at any sensitive
21 receptor. Furthermore, as described above, a cumulatively considerable noise impact with
22 respect to construction does not exist. Accordingly, construction of the Proposed Project
23 would not make a cumulatively considerable contribution to a significant cumulative
24 noise impact under CEQA and NEPA.

25 Although operational noise levels would be somewhat higher than under baseline
26 conditions, operation of the Proposed Project would not generate noise that would exceed
27 significance criteria at any sensitive receptor. Accordingly, although a significant
28 cumulative impact is assumed to exist, the Proposed Project would not make a
29 cumulatively considerable contribution to that significant cumulative impact.

30 **Contribution of the Alternatives**

31 Alternative 1 would not involve any construction activities; therefore, there would be no
32 potential for cumulative construction impacts under CEQA. Alternative 2 would involve
33 only construction of the on-dock railyard expansion; as shown in Table 3.9-22, daytime
34 construction noise would not exceed the threshold of significance and would therefore
35 not make a cumulatively considerable contribution to a significant cumulative impact
36 under CEQA. Alternative 1 is not required to be analyzed under NEPA, and Alternative 2
37 would result in no impacts under NEPA because it is identical to the NEPA baseline.

38 **Mitigation Measures and Residual Cumulative Impacts**

39 The Proposed Project would not have a significant impact with regard to noise.
40 Accordingly, no mitigation is required and the Proposed Project's residual impact would
41 represent a cumulatively considerable contribution to a significant cumulative operational
42 noise impact under CEQA and NEPA.

43

1 **Cumulative Impact NOI-2: Would the Proposed Project or**
2 **alternatives result in a considerable contribution to a cumulatively**
3 **significant generation of excessive groundborne vibration or**
4 **groundborne noise levels?**

5 **Impacts of Past, Present, and Reasonably Foreseeable Future**
6 **Projects**

7 The three related projects near the project site that could be under construction at the
8 same time as the Proposed Project are more than 500 feet from one another and would
9 therefore not combine to result in a significant cumulative impact regarding groundborne
10 construction noise. Operation of related projects in the vicinity of the Proposed Project
11 would likewise not result in a significant cumulative impact because of the distances
12 between the projects themselves and between the projects and sensitive receptors.

13 **Contribution of the Proposed Project (Prior to Mitigation)**

14 Construction and operation at the Berths 121-131 Terminal would be more than 500 feet
15 from the nearest sensitive receivers. Groundborne vibration (and related groundborne
16 noise) dissipates rapidly over distance and would be minimal to non-existent at a distance
17 of 500 feet. Therefore, the Proposed Project is not expected to result in excessive ground-
18 borne vibration or ground-borne noise levels and would not make a cumulatively
19 considerable contribution to a significant cumulative impact.

20 **Contribution of the Alternatives**

21 Alternative 1 would not involve any construction activities; therefore, there would be no
22 potential for cumulative construction impacts under CEQA. Alternative 2 would involve
23 only construction of the on-dock railyard expansion, and would not, therefore, make a
24 cumulatively considerable contribution to a significant cumulative noise impact.
25 Alternative 1 is not required to be analyzed under NEPA, and Alternative 2 would result
26 in no impacts under NEPA because it is identical to the NEPA baseline.

27 **Mitigation Measures and Residual Cumulative Impacts**

28 Neither the Proposed Project nor any alternative would make a cumulatively considerable
29 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
30 mitigation measures would be required.

31 **Cumulative Impact NOI-3: For projects located within the vicinity of**
32 **a private airstrip or an airport land use plan or, where such a plan**
33 **has not been adopted, within 2 miles of a public airport or public use**
34 **airport, would the Proposed Project or alternatives make a**
35 **cumulatively considerable contribution to a significant cumulative**
36 **impact related to exposing people residing or working in the project**
37 **area to excessive noise levels?**

38 **Impacts of Past, Present, and Reasonably Foreseeable Future**
39 **Projects**

40 The nearest public use airport is Zamperini Field (Torrance Municipal Airport), in
41 Torrance, approximately 3.5 miles northwest of the Berths 121-131 Terminal. Some of
42 the related projects in Wilmington and Carson are closer to that airport, but none is within

1 2 miles. There are no known private airstrips in the vicinity, and the area is not governed
2 by an airport land use plan. Accordingly, the related projects do not represent a
3 significant cumulative impact.

4 **Contribution of the Proposed Project (Prior to Mitigation)**

5 The project site is not within a 2-mile radius of any private, public, or public use airports
6 or within an airport land use plan. Therefore, the Proposed Project would not expose
7 people to excessive noise levels associated with these types of facilities.

8 **Contribution of the Alternatives**

9 Because the project site is not within 2 miles of an airport or under an airport land use
10 plan, Alternatives 1 and 2 would not make a considerable contribution to noise levels at
11 those facilities under CEQA. Alternative 1 is not required to be analyzed under NEPA,
12 and Alternative 2 would result in no impacts under NEPA.

13 **Mitigation Measures and Residual Cumulative Impacts**

14 Neither the Proposed Project nor any alternative would make a cumulatively considerable
15 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
16 mitigation measures would be required.

17 **4.2.10 Ground Transportation**

18 **4.2.10.1 Scope of Analysis**

19 The transportation environmental setting for the cumulative ground transportation
20 analysis includes those streets and intersections that would be used by employee
21 automobile traffic. Impacts of the Proposed Project were qualitatively assessed relative to
22 potential conflicts with area plans, design features, and emergency access, and
23 quantitatively assessed relative to VMT as prescribed in the LADOT Transportation
24 Assessment Guidelines (Guidelines; LADOT 2022). The VMT analysis is applicable for
25 both CEQA and NEPA assessment. The impacts of the alternatives are assessed
26 qualitatively relative to the impacts of the Proposed Project.

27 The VMT analysis required by CEQA considers only personal vehicle trips and does not
28 include trips by heavy-duty trucks. However, for informational purposes, an analysis of
29 the effects of Project-related truck traffic on levels of service (LOS) and turning lane
30 queuing on local roadways and intersections is presented in Appendix E2 Ground
31 Transportation and Level of Service Analysis. That analysis, which is summarized in an
32 informational section below, constitutes a cumulative analysis as it considers the impact
33 of the Proposed Project on future-year regional traffic conditions (i.e., incorporating the
34 related projects and overall regional growth).

35 **4.2.10.2 Methodology**

36 The methodologies used to analyze transportation impacts under CEQA and NEPA are
37 based on the LADOT Transportation Assessment Guidelines (LADOT 2022). The
38 quantitative VMT analysis was conducted with the PortTAM Model, the TransCAD
39 model (see Section 3.10.4.1 and Appendix C1 for details of the models, the modeling
40 input assumptions, and the data used in this analysis) and the LADOT VMT Calculator.

1 The analysis of cumulative transportation impacts includes a consideration of reasonably
2 foreseeable local transportation improvement projects, which include the Navy Way
3 Interchange Project (#4 in Table 4-1), Caltrans' State Route 47/Vincent Thomas Bridge
4 and Front Street/Harbor Boulevard Interchange Reconfiguration Project (#18), and the
5 Avalon and Fries Street Segments Closure Project (#25).

6 The analysis of cumulative impacts on nearby intersection LOS and queuing, presented
7 for informational purposes, is presented in Appendix C2.

8 **4.2.10.3 Cumulative Impacts and Mitigation Measures**

9 **Cumulative Impact TRANS-1: Would the Proposed Project or**
10 **alternatives make a cumulatively considerable contribution to a**
11 **significant cumulative conflict with a program, plan, ordinance or**
12 **policy addressing the circulation system, including transit, roadway,**
13 **bicycle and pedestrian facilities?**

14 **Impacts of Past, Present, and Reasonably Foreseeable Future** 15 **Projects**

16 The related projects (Table 4-1) were reviewed for their potential to alter the circulation
17 system in a manner that would conflict with programs, plans, ordinances, or policies.
18 from the related projects would not represent a significant cumulative impact. Some of
19 the future related projects would include modifications of existing roadways and could
20 require alteration or transit routes and designated bikeways (e.g., Navy Way Interchange
21 [#4], SR-47/Vincent Thomas Bridge & Front St./Harbor Blvd. Interchange
22 Reconfiguration [#18], Avalon/Fries Street Closure [#25], and Pier B Rail Yard
23 Expansion [#27]). None of those projects would result in substantial modifications of the
24 existing circulation, and some would improve traffic conditions. Accordingly, the related
25 projects do not represent a significant cumulative impact.

26 **Contribution of the Proposed Project (Prior to Mitigation)**

27 As described in Section 3.10.4.5, the Proposed Project would not include any
28 modifications to existing roadways that support current or future bike lanes or bus stops
29 and is not required to make any voluntary or required modifications to the public right-of-
30 way. Accordingly, the Proposed Project would have no impact and would therefore not
31 make a cumulatively considerable contribution to a significant cumulative impact.

32 **Contribution of the Alternatives**

33 The No Project Alternative and the No Federal Action Alternative would not include any
34 modifications to existing roadways that support current or future bike lanes or bus stops
35 and is not required to make any voluntary or required modifications to the public right-of-
36 way. Accordingly, both alternatives would have no impact and would therefore not make
37 a cumulatively considerable contribution to a significant cumulative impact under CEQA.
38 Alternative 1 is not required to be analyzed under NEPA, and Alternative 2 would result
39 in no impacts under NEPA.

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor any alternative would make a cumulatively considerable contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no mitigation measures would be required.

Cumulative Impact TRANS-2: Would the Proposed Project or alternatives make a cumulatively considerable contribution to a significant cumulative conflict or inconsistency with CEQA Guidelines section 15064.3, subdivision (b)?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

CEQA Guidelines Section 15064.3 subdivision (b), provides criteria for analyzing transportation impacts that are based on vehicle miles traveled (VMT) by automobiles (e.g. employee travel). In 2018 the Governor's Office of Policy and Research provided additional guidance on analyzing impacts related to VMT. In this Draft EIS/EIR, the impacts of heavy-duty vehicles (i.e., drayage trucks and construction-related vehicles) are analyzed in other resource areas, such as Air Quality, Greenhouse Gas Emissions, Noise, and Energy, and in Appendix C2.

Existing traffic conditions in the Project area (see Section 3.10.4.5) include a daily work threshold of 12.3 VMT. Per-capita VMT throughout Southern California is projected to decrease in the future as a result of implementation of regional transportation strategies (SCAG 2019). That projection incorporates forecasted growth in population and industry, including the related projects. Accordingly, the related projects do not represent a significant cumulative impact.

Contribution of the Proposed Project (Prior to Mitigation)

According to the LADOT Transportation Assessment Guidelines, a project would have a significant cumulative impact if it is inconsistent with SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). However, if the project does not have a significant VMT impact it would not be inconsistent and would not, therefore result in a cumulatively considerable contribution to a significant cumulative impact. Accordingly, because the Proposed Project would not result in a significant VMT impact (see Section 3.10.4.5), it would not make a cumulatively considerable contribution to a significant cumulative impact.

Contribution of the Alternatives

Alternatives 1 (No Project) and 2 (No Federal Action) are operationally similar as they represent the existing capacity of the terminal. Furthermore, the numbers of employee would be similar for the two alternatives and in both cases the VMT per employee would be similar to that of the Proposed Project. Accordingly, neither alternative would make a cumulatively considerable contribution to a significant cumulative impact under CEQA. Alternative 1 is not required to be analyzed under NEPA, and Alternative 2 would result in no impact under NEPA.

Mitigation Measures and Cumulative Residual Impacts

Neither the Proposed Project nor any alternative would make a cumulatively considerable contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no mitigation measures would be required.

Cumulative Impact TRANS-3: Would the Proposed Project or alternatives make a cumulatively considerable contribution to a significant cumulative impact related to hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The related projects have not resulted in local or regional hazards due to design features. The projects are sufficiently separated from one another that they do not influence the design of one another's traffic features. As discussed under Cumulative Impact TRANS-1, some of the related projects involve modification of transportation infrastructure; by improving roadway and intersection design, those projects would reduce hazards. Accordingly, the related projects do not represent a significant cumulative impact.

Contribution of the Proposed Project (Prior to Mitigation)

The Proposed Project does not include new driveways or new vehicle access to the property from the public right-of-way, and the Proposed Project is not proposing or required to make any voluntary or required modifications to the public right-of-way. Consequently, the Proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact under CEQA or NEPA.

Contribution of the Alternatives

For the same reasons as discussed for the Proposed Project, Alternatives 1 and 2 would not be expected to make a cumulatively considerable contribution to a significant cumulative impact under CEQA. Alternative 1 is not required to be analyzed under NEPA, and Alternative 2 would result in no impact under NEPA.

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor either alternative would make a cumulatively considerable contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no mitigation measures would be required.

Cumulative Impact TRANS-4: Would the Proposed Project or alternatives make a cumulatively considerable contribution to a significant cumulative impact related to inadequate emergency access?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The related projects have been or would be designed and constructed in compliance with all applicable city building codes, including providing adequate emergency access. Plan review and inspections by the relevant fire and safety authorities (e.g., LAFD) would

1 confirm that compliance. Moreover, traffic generated by the related projects would be
2 dispersed throughout the general region rather than being concentrated and would
3 therefore not interfere substantially with emergency access or movement of emergency
4 vehicles. Accordingly, the related projects do not represent a significant cumulative
5 impact.

6 **Contribution of the Proposed Project**

7 Because the Proposed Project would not alter or close existing roadways or emergency
8 access points, it would not make a cumulatively considerable contribution to a significant
9 cumulative impact under CEQA or NEPA.

10 **Contribution of the Alternatives**

11 For the same reasons as discussed for the Proposed Project, Alternatives 1 and 2 would
12 not be expected to make a cumulatively considerable contribution to a significant
13 cumulative impact under CEQA. Alternative 1 is not required to be analyzed under
14 NEPA, and Alternative 2 would result in no impact under NEPA.

15 **Mitigation Measures and Residual Cumulative Impacts**

16 Neither the Proposed Project nor any alternative would make a cumulatively considerable
17 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
18 mitigation measures would be required.

19 **Level-of-Service Informational Analysis**

20 As described above, an analysis of the potential impacts of the Proposed Project on future
21 traffic operating conditions was conducted for informational purposes. The methodology
22 and results of that analysis are presented in Appendix C2. Because LOS is not an issue
23 required by CEQA or NEPA, a determination of impacts is not applicable; instead, this
24 analysis presents a description of the cumulative effects of related projects on traffic
25 conditions and of the contribution of the Proposed Project and alternatives to those
26 conditions.

27 **Effects of Past, Present, and Reasonably Foreseeable Future 28 Projects**

29 The related projects are analyzed as part of overall projected future traffic conditions, as
30 tables E-2.2 through E-2.5. Under baseline conditions, only one of the intersections in the
31 vicinity of the Proposed Project operates at an unacceptable level of service (LOS) during
32 one of the peak hours (i.e., Alameda/Anaheim). The remaining intersections operate at
33 LOS C or better. In the future without the Proposed Project, the Alameda/Anaheim
34 intersection is projected to operate at LOS D or better, but the intersection at Front
35 Street/Knoll Drive, which coincides with the B121-131 Terminal's secondary gate, would
36 operate at LOS E starting in 2045.

37 **Contribution of the Proposed Project**

38 As described in Appendix C2, the Proposed Project would have little long-term effect on
39 operating conditions at the study intersections. The Proposed Project's traffic, including
40 drayage trucks, would not cause any LOS to degrade compared to the without-project
41 conditions, and the maximum increase in delay would be 2.3 seconds per vehicle, at the
42 John S Gibson/I-110 intersection, which coincides with the terminal's primary gate. The

1 Proposed Project’s contribution to the LOS E condition at Front Street/Knoll Drive in
2 2045 would be an increase in delay of 0.1 second per vehicle.

3 **Contribution of the Alternatives**

4 The “without project” condition describes the effects of the No Project Alternative in
5 conjunction with related projects. Since the No Project Alternative would generate less
6 traffic than the Proposed Project, its effects on LOS would be correspondingly less. The
7 No Federal Action Alternative would have somewhat less truck traffic than the No
8 Project Alternative, and would, therefore, have even less of an effect on LOS.

9 **4.2.11 Public Services**

10 **4.2.11.1 Scope of Analysis**

11 Cumulative impacts on utilities can result from the combined demand of the Proposed
12 Project with past, present, and future related projects on any of the public services for
13 which the Proposed Project may have impacts (i.e., police and fire protection). The
14 geographic scope of the analysis consists of the immediate area of the Port, as that is the
15 location of the police and fire facilities that would respond to the demands of the related
16 projects and the Proposed Project and alternatives. Those facilities are described in
17 Section 3.11.2.

18 **Cumulative Impact PS-1: Would the Proposed Project result in**
19 **substantial adverse physical impacts associated with the provision**
20 **of new or physically altered governmental facilities, need for new or**
21 **physically altered governmental facilities, the construction of which**
22 **could cause significant environmental impacts, in order to maintain**
23 **acceptable service ratios, response times, or other performance**
24 **objectives for any of the public services: fire protection, police**
25 **protection?**

26 **Impacts of Past, Present, and Reasonably Foreseeable Future** 27 **Projects**

28 Current staffing and equipment for the Los Angeles Police Department, Los Angeles Fire
29 Department, and Los Angeles Port Police in the harbor area have been allocated to meet
30 the demands of the local communities and industries. Response times (Section 3.11.2) are
31 considered adequate. Accordingly, the related projects do not have a significant
32 cumulative impact with respect to public services.

33 **Contribution of the Proposed Project**

34 As described in Section 3.11.4.3, construction of the Proposed Project would not
35 substantially increase the demand for police or fire protection services, as increases in
36 construction traffic would be counteracted by a decrease in operational traffic and there
37 would be no alteration or interference with emergency access.

38 Operation of the Proposed Project would result in increased truck and personal vehicle
39 traffic and an increased workforce. However, the increased traffic would not interfere
40 with emergency access and would not result in a substantial increase in demand for police

1 and fire protection services. Accordingly, the Proposed Project would not make a
2 cumulatively considerable contribution to a significant cumulative impact.

3 **Contribution of the Alternatives**

4 For the same reasons as discussed for the Proposed Project, Alternatives 1 and 2 would
5 not be expected to make a cumulatively considerable contribution to a significant
6 cumulative impact under CEQA. Alternative 1 is not required to be analyzed under
7 NEPA and Alternative 2 would result in no impact under NEPA because it is identical to
8 the NEPA baseline.

9 **Mitigation Measures and Residual Cumulative Impacts**

10 Neither the Proposed Project nor any alternative would make a cumulatively considerable
11 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
12 mitigation measures would be required.

13 **4.2.12 Utilities and Service Systems**

14 **4.2.12.1 Scope of Analysis**

15 Cumulative impacts on utilities can result from the combined demand of the Proposed
16 Project with past, present, and future related projects on any of the utilities for which the
17 Proposed Project may have impacts (i.e., water supply, solid waste management, and
18 wastewater treatment capacities). In this DEIS/DEIR, cumulative impacts related to energy
19 supplies and consumption (i.e., LADWP's electrical system and Southern California Gas
20 Company's natural gas system) are considered in Section 4.2.5.

21 The geographic scope of the cumulative effect analysis of utilities depends on the service area
22 of the individual utility provider. Because the Proposed Project has the capacity to affect the
23 environment within the Port and surrounding communities, the geographic scope for
24 cumulative impacts includes the Port of Los Angeles and immediately adjacent areas,
25 including the communities of San Pedro and Wilmington. Direct impacts of the Proposed
26 Project would be localized to the Port area, and indirect impacts could extend further within
27 the communities of San Pedro and Wilmington. The service areas of the Bureau of Sanitation
28 (wastewater), Sanitation Districts of Los Angeles County (solid waste and wastewater
29 treatment), and LADWP (water) encompass the City of Los Angeles (LACDPW 2020). The
30 geographic region for cumulative utilities impacts is the Los Angeles Harbor area because the
31 infrastructure immediately serving the Proposed Project is located within this service area.
32 Service subareas of utility providers are sufficiently separated such that increased service
33 demands from the Proposed Project would not threaten provision of service in other areas.

34 The significance criteria used for the cumulative analysis are the same as those used for
35 the Proposed Project in Section 3.12, Utilities and Service Systems.

36 **Cumulative Impact UT-1: Would the Proposed Project or alternatives**
37 **make a cumulatively substantial contribution to a significant**
38 **cumulative impact related to the relocation or construction of new or**
39 **expanded water, wastewater treatment or storm water drainage,**
40 **electric power, natural gas, or telecommunications facilities, the**

1 **construction or relocation of which could cause significant**
2 **environmental effects?**

3 **Impacts of Past, Present, and Reasonably Foreseeable Future**
4 **Projects**

5 The existing water supply infrastructure in the vicinity of the Port supplies a substantial
6 population and numerous industries and commercial businesses. None of the related
7 projects in Table 4-1 would require major infrastructure relocations or the construction of
8 substantial new water supply facilities. Accordingly, the related past, present, and
9 reasonably foreseeable future projects would not require construction or relocation of
10 facilities that could have cumulatively significant environmental impacts.

11 Operation of past projects has created a demand for wastewater infrastructure that is
12 currently accommodated by existing transportation and treatment facilities. As described
13 in Section 3.12.2, the wastewater treatment facility, the Terminal Island Water
14 Reclamation Plant (TIWRP), currently operates at approximately 50% capacity and the
15 City projects that approximately 40% of the facility's capacity would remain unused and
16 available for future years beyond 2040 (LASAN and LADWP 2018). It is expected that
17 all present and reasonably foreseeable future projects would be designed to be fully
18 compliant with wastewater treatment requirements of the Los Angeles RWQCB, and
19 cumulative projects listed in Table 4.1 would be accommodated by the available capacity
20 at the TIWRP. Therefore, past, present, and reasonably foreseeable future projects would
21 not require construction or relocation that could have cumulatively significant
22 environmental impacts and would not result in a significant cumulative impact.

23 The related projects generate solid waste that consumes landfill capacity in Los Angeles
24 County. As described in Section 3.12.2.4, existing landfills are projected to have
25 adequate capacity for at least 20 years (LACDPW 2020). Given that capacity, and the
26 City of Los Angeles' solid waste reduction and recycling goals and programs (LASAN
27 2013), the past, present, and reasonably foreseeable future projects would not result in a
28 significant cumulative impact on solid waste disposal facilities or require construction or
29 relocation that could have cumulatively significant environmental impacts.

30 Electricity and natural gas distribution infrastructure is adequate to supply the related
31 projects, as none envision substantial changes, relative to regional demand, in the
32 quantities of electricity and gas that need to be transported and delivered. Therefore, past,
33 present, and reasonably foreseeable future projects would not result in a significant
34 cumulative impact related to infrastructure construction or relocation that could have
35 cumulatively significant environmental impacts.

36 **Contribution of the Proposed Project**

37 The Proposed Project would use nearly twice as much water as under the CEQA baseline
38 conditions (Table 3.12-5), but that amount of water could be supplied by existing
39 infrastructure. Therefore, the Proposed Project would not make a cumulatively
40 considerable contribution to a significant cumulative impact.

41 Wastewater generated from the Proposed Project would continue to be conveyed to, and
42 treated by, the TIWRP during construction and operation of the Proposed Project.
43 Wastewater flows would increase during future operations as employment and cargo
44 throughput increased, but existing conveyance and treatment infrastructure is adequate to
45 handle the increased volume. Therefore, no relocation or new construction is required,

1 and the Proposed Project would not make a cumulatively considerable contribution to a
2 significant cumulative impact.

3 The Proposed Project would generate approximately 140 lbs/day more solid waste than
4 under baseline conditions (Table 3.12-7), which would represent an insubstantial fraction
5 of existing landfill capacity and would not require construction of new solid waste
6 handling and disposal facilities. Therefore, the Proposed Project would not make a
7 cumulatively considerable contribution to a significant cumulative impact.

8 Existing electrical and natural gas infrastructure, consisting of substations, transmission
9 lines, and pipelines in the Port area, are adequate to supply the Proposed Project, since
10 high-voltage electrical infrastructure to support AMP already connects the Project site to
11 the grid. Additional power distribution facilities would be provided inside the terminal as
12 part of the Proposed Project. As natural gas usage would not increase substantially, the
13 existing infrastructure is adequate to supply the Proposed Project, and no new facilities
14 would be required. Accordingly, the Proposed Project would not make a cumulatively
15 considerable contribution to a significant cumulative impact.

16 **Contribution of the Alternatives**

17 As shown in tables 3.12-4 through 3.12-6, water consumption, wastewater generation,
18 and solid waste generation by the alternatives would be less than those of the Proposed
19 Project. The electrical and gas demands would likewise be less than those of the
20 Proposed Project. Accordingly, the alternatives, like the Proposed Project, would not
21 require the construction of new infrastructure that could cause environmental impacts,
22 and Alternatives 1 (No Project) and 2 (No Federal Action) would not make a
23 cumulatively considerable contribution to a significant cumulative impact under CEQA.
24 Alternative 1 is not required to be analyzed under NEPA and Alternative 2 would result
25 in no impacts under NEPA because it is identical to the NEPA baseline.

26 **Mitigation Measures and Residual Cumulative Impacts**

27 Neither the Proposed Project nor any alternative would make a cumulatively considerable
28 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
29 mitigation measures would be required.

30 **Cumulative Impact UT-2: Would the Proposed Project or alternatives 31 make a cumulatively substantial contribution to a significant 32 cumulative impact related to increases in water demand that would 33 exceed the water supplies to serve the project and reasonably 34 foreseeable future development during normal, dry and multiple dry 35 years?**

36 **Impacts of Past, Present, and Reasonably Foreseeable Future 37 Projects**

38 Construction and operation of past projects have resulted in existing demands for water.
39 These demands are currently accommodated by LADWP's existing facilities and
40 supplies. The current and reasonably foreseeable future related projects would further
41 increase the demands for water. As described in Section 3.12.2.1, LADWP projects that,
42 despite tightening water supplies due to long-term drought, it will be able to supply its
43 service area with water through 2045, the limit of the UWMP forecast (LADWP 2021).
44 Its forecast accounts for expected growth in the region, which would include the

1 reasonably foreseeable future related projects in Table 4-1. Furthermore, LADWP will
2 continue to project future water demands and supply through new UWMPs every five
3 years. Accordingly, the past, present, and reasonably foreseeable future projects would
4 not result in a significant cumulative impact related to the provision of water and related
5 facilities.

6 **Contribution of the Proposed Project**

7 The Proposed Project would result in increased water demands but would not require new
8 or expanded infrastructure. As discussed in Section 3.12.4.3, operation of the Proposed
9 Project would result in a water demand increase over CEQA baseline conditions that
10 would be less than the thresholds requiring a water supply assessment, would represent a
11 small fraction of the total LADWP demand (approximately 0.0039 percent; Table 3.12-
12 5), and would be within LADWP's ability to supply regardless of drought conditions.
13 Accordingly, the Proposed Project's contribution to cumulative water demand would be
14 less than cumulatively considerable.

15 **Contribution of the Alternatives**

16 Alternatives 1 and 2 would result in an increase in water demand compared to the CEQA
17 baseline because employment and throughput would increase. However, because the
18 increase would be less than for the Proposed Project, LADWP could readily meet the
19 demand, and neither alternative would make a cumulatively considerable contribution to
20 a significant cumulative impact under CEQA related to exceeding water supplies.
21 Alternative 1 is not required to be analyzed under NEPA and Alternative 2 would result
22 in no impact under NEPA because it is identical to the NEPA baseline.

23 **Mitigation Measures and Residual Cumulative Impacts**

24 The Proposed Project would not make a cumulatively considerable contribution to a
25 significant cumulative impact related to water supply. No mitigation is required.

26 **Cumulative Impact UT-3: Would the Proposed Project or alternatives 27 make a cumulatively considerable contribution to a significant 28 cumulative impact related to a wastewater treatment provider's 29 capacity to serve the project's projected demand in addition to the 30 provider's existing commitments?**

31 **Impacts of Past, Present, and Reasonably Foreseeable Future 32 Projects**

33 Wastewater infrastructure has been constructed in the region to ensure that existing and
34 anticipated facilities have adequate wastewater conveyance and treatment facilities. The
35 TIWRP currently operates at approximately 50% capacity and is projected to have at
36 least 40% of its capacity still unused by 2040 (see Section 3.12.2.2). Reasonably
37 foreseeable related projects would be constructed in accordance with applicable codes,
38 which would regulate provision of adequate wastewater conveyance infrastructure.
39 Accordingly, the past, present, and reasonably foreseeable related projects do not
40 represent a significant cumulative impact.

41 **Contribution of the Proposed Project**

42 As described in Section 3.12.4.1, the Proposed Project's additional 9,600 gpd
43 contribution to the TIWRP's daily wastewater processing capacity would constitute

1 approximately 0.06% of the TIWRP's available capacity. That negligible increase,
2 combined with the contributions from past, present, and reasonably foreseeable future
3 projects, would not exceed the future daily capacity of the TIWRP. Consequently, the
4 Proposed Project would not contribute to a cumulatively considerable impact related to
5 exceeding the existing wastewater infrastructure capacity.

6 **Contribution of the Alternatives**

7 Alternatives 1 and 2 would not change the wastewater conveyance infrastructure or
8 substantially increase wastewater flows compared to the CEQA baseline and would
9 therefore not make a cumulatively considerable contribution to a significant cumulative
10 impact under CEQA related to wastewater treatment infrastructure. Alternative 1 is not
11 required to be analyzed under NEPA and Alternative 2 would result in no impact under
12 NEPA because it is identical to the NEPA baseline.

13 **Mitigation Measures and Residual Cumulative Impacts**

14 The Proposed Project and alternatives would not make a cumulatively considerable
15 contribution to a significant cumulative impact related to stormwater infrastructure. No
16 mitigation is required.

17 **Cumulative Impact UT-4: Would the Proposed Project or alternatives** 18 **make a cumulatively considerable contribution to a significant** 19 **cumulative impact related to generation of solid waste in excess of** 20 **state or local standards, or in excess of the capacity of local** 21 **infrastructure, or other impairment of the attainment of solid waste** 22 **reduction goals?**

23 **Impacts of Past, Present, and Reasonably Foreseeable Future** 24 **Projects**

25 Construction and operation of past projects have resulted in the generation of solid waste,
26 which is currently accommodated by existing facilities. Non-hazardous solid waste from
27 the area is hauled and disposed of under the exclusive franchise system for solid waste
28 established by the City of Los Angeles (see Section 3.12.2). Hazardous waste is hauled
29 by private contractors, and construction waste and contaminated soil are hauled by
30 construction contractors and/or private firms under subcontract. As described in Section
31 3.12.2.4 and in Cumulative Impact UT-1, the primary landfills for non-hazardous waste
32 that serve the Port area, Sunshine Canyon and Chiquita Canyon, have adequate capacity
33 to serve the region's needs. Moreover, there are several other landfills and recycling
34 facilities identified in Section 3.12.2 for disposal of non-hazardous and hazardous wastes.

35 Many of the projects identified in Table 4-1 are Port redevelopment projects that
36 generally do not require any expansion of facilities. However, some of the related
37 projects involve new, expanded, or intensified land uses that may result in additional
38 generation of solid waste. These projects include the Berths 191-194 [Ecocem] Project
39 (#4), Outer Harbor Cruise Terminal (#18), West Harbor Modification Project (#20), and
40 residential and commercial projects in San Pedro and Wilmington communities.
41 Nevertheless, with the remaining capacity of the Sunshine Canyon and Chiquita Canyon
42 landfills, the additional capacity afforded by other landfills, and anticipated recycle
43 diversion rates for the area, solid waste removal and disposal would be adequately
44 provided for past, current, and future projects, and cumulative impacts are less than
45 significant.

Contribution of the Proposed Project

Construction and demolition activities could generate significant quantities of debris that would require disposal in a landfill. Construction and demolition materials would include asphalt, metals, and other solids. However, the Port, through its sustainable design and construction policies and practices to protect the environment, requires substantial recycling of construction and demolition debris. Moreover, the Proposed Project would be required to implement special conditions SC UT-1 and SC UT-2 (see Section 3.12.4.3). The first condition requires separation and recycling of recyclable demolition and construction materials. The second condition requires use of recycled content in construction materials, where feasible.

By 2045, the Proposed Project's operation would generate approximately 139 pounds (0.07 ton) per day over the CEQA baseline level and an additional 56 pounds per day over the NEPA baseline. The amount generated by the Proposed Project represents 0.0014% of Sunshine Canyon's permitted capacity of 12,100 tons per day. The landfill would be able to accommodate these small increases through its closure date. Furthermore, the Proposed Project would be included in the City's zero-waste initiative (Section 3.12.4.3). Given the Proposed Project's negligible contribution to the solid waste stream in Los Angeles and the requirements to recycle both construction and operational wastes, the Proposed Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to solid waste.

Contribution of the Alternatives

For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would not make a cumulatively considerable contribution to a significant cumulative impact under CEQA related to solid waste. Alternative 1 is not required to be analyzed under NEPA and Alternative 2 would result in no impact under NEPA because it is identical to the NEPA baseline.

Mitigation Measures and Residual Cumulative Impacts

The Proposed Project and alternatives would not make a cumulatively considerable contribution to a significant cumulative impact related to solid waste generation. No mitigation is required.

Cumulative Impact UT-5: Would the Proposed Project or alternatives make a cumulatively considerable contribution to a cumulative impact related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The State of California has established solid waste management requirements, such as AB 1327 and AB 939 (see Section 3.12.3.1), that are implemented by local and regional governments such as cities and counties. Businesses operating in the City of Los Angeles and surrounding jurisdictions (e.g., Carson, Long Beach, Los Angeles County) are required to conform to the solid waste management policies and programs of those jurisdictions. For example, in the City of Los Angeles, the Solid Waste Integrated Resource Plan (see Section 3.12.3.2) lays out the City's goals and objectives. The related projects can be assumed to comply with their cities' regulations regarding solid waste, as

1 compliance would be incorporated into their various construction and operating permits.
2 Accordingly, the past, present, and reasonably foreseeable related projects do not
3 represent a significant cumulative impact.

4 **Contribution of the Proposed Project**

5 As described in Section 3.12.4.3, the Proposed Project would be required to conform to
6 the policies and programs of the City of Los Angeles' Solid Waste Integrated Resource
7 Plan (see Section 3.12.3). Furthermore, the nature of operations at the Project site and the
8 waste streams generated by those operations would not change materially from baseline
9 conditions, which include compliance with the applicable state and local waste reduction
10 and recycling goals and requirements described in Section 3.12.3. Accordingly, the
11 Proposed Project would not result in a cumulatively considerable contribution to a
12 significant cumulative impact related to compliance with statutes and regulations related
13 to solid waste.

14 **Contribution of the Alternatives**

15 Alternatives 1 and 2 would generate less solid waste than the Proposed Project.
16 Therefore, for the same reasons as described for the Proposed Project, Alternatives 1 and
17 2 would not make a cumulatively considerable contribution to a significant cumulative
18 impact under CEQA related to compliance with solid waste management and reduction
19 statutes. Alternative 1 is not required to be analyzed under NEPA and Alternative 2
20 would result in no impact under NEPA because it is identical to the NEPA baseline.

21 **Mitigation Measures and Residual Cumulative Impacts**

22 Neither the Proposed Project nor any alternative would make a cumulatively considerable
23 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
24 mitigation measures would be required.

25 **4.2.13 Water Quality, Hydrology, and Sediments**

26 **4.2.13.1 Scope of Analysis**

27 The geographic scope of analysis for cumulative impacts to water and sediment quality is
28 the Los Angeles and Long Beach Harbor (Inner and Outer Harbor areas), as these areas
29 represent the receiving waters for all cumulative projects considered. The geographic
30 scope for surface water hydrology and flooding is the Proposed Project's backlands and
31 immediately adjacent lands within the Harbors subwatershed, because this represents the
32 drainage area that could be influenced by the Proposed Project and other cumulative
33 projects.

34 The significance criteria used for the cumulative analysis are the same as those used for
35 the Proposed Project and alternatives in Section 3.13.4. These criteria are the same for
36 both CEQA and NEPA impact analyses. The Initial Study that supported the NOP for the
37 Proposed Project concluded that construction and operation of the Proposed Project
38 would have no impacts on groundwater supplies or recharge. Accordingly, an evaluation
39 of impacts under WQ-2 is not included in this Draft EIS/EIR.

40

1 **Cumulative Impact WQ-1: Would the Proposed Project or alternatives**
2 **contribute to a cumulatively considerable violation of any water**
3 **quality standards or waste discharge requirements or otherwise**
4 **substantially degrade surface or groundwater quality?**

5 **Impacts of Past, Present, and Reasonably Foreseeable Future**
6 **Projects**

7 Water and sediment quality within the geographic scope are affected by activities within
8 the Harbor (i.e., shipping, wastewater discharges from the TIWRP, inputs from the
9 watershed including aerial deposition of particulate pollutants, and effects from historical
10 [legacy] inputs to the Harbor). As discussed in Section 3.13, Los Angeles and Long
11 Beach harbors are identified on the current Section 303(d) list as impaired for a variety of
12 chemical and bacteriological stressors and effects to biological communities. The current
13 beneficial uses of the waters of Inner Los Angeles Harbor (which includes the Project
14 site), as identified in the Basin Plan (LARWQCB 2014) include: industrial service
15 supply, navigation, noncontact water recreation, commercial and sportfishing, marine
16 habitat, and preservation of rare and endangered species. For those stressors causing
17 water quality impairments, the Los Angeles RWQCB amended the Basin Plan
18 (Resolution No. 2004-011) to incorporate a TMDL for bacteria at Los Angeles Harbor,
19 including Inner Cabrillo Beach and the Main Channel (effective 2005). The Basin Plan
20 was also amended (Resolution No. R11-008) to incorporate the TMDL for toxic
21 pollutants in Dominguez Channel and the Port Complex; this Harbor Toxics TMDL took
22 effect in March 2012 and was placed under reconsideration by the LARWQCB in 2018.

23 Past, present, and reasonably foreseeable future related projects with in-water and over-
24 water construction components, such as dredging, dike placement, fill, pile driving, and
25 pier upgrades, would result in temporary and localized effects to water quality that would
26 be individually comparable to those associated with the Proposed Project. Water quality
27 impacts associated within-water/over-water construction projects would not persist for
28 the same reasons discussed in Section 3.13. Therefore, cumulative impacts would occur
29 only if the spatial influences of concurrent projects overlapped. Of the cumulative related
30 projects listed in Table 4-1, only the Berth 164 [Nustar-Valero] Marine Oil Terminal (#1)
31 and Berths 167-169 [Shell] Marine Oil Terminal (#24) projects are in the general vicinity
32 of the Proposed Project, involve in-water construction activities, and could be under
33 construction at the same time as the Proposed Project. Construction of the remaining
34 nearby projects that included in-water work has been completed. A number of other
35 related projects involve in-water construction (i.e., five Port of Los Angeles projects and
36 three Port of Long Beach projects), but the water quality effects of these projects would
37 be limited to the immediate construction area and would not affect, or be affected by,
38 construction of the Proposed Project. As a result, construction of the present and
39 reasonably foreseeable future projects would not be expected to result in a significant
40 cumulative impact to water quality.

41 Development of port facilities associated with the cumulative related projects could result
42 in a greater number of ship visits to the Port Complex, although in recent years the
43 number of vessel calls has tended downward as vessel size has increased faster than cargo
44 volumes. Assuming that the potential for accidental spills, illegal vessel discharges, and
45 leaching of contaminants from vessel hulls would increase in proportion to increased
46 vessel traffic, waste loadings to the Harbor could also increase. The Oil Spill Prevention,
47 Control, and Countermeasure (SPCC) regulations require that the Port have in place
48 measures that minimize the possibility of oil spills. If spills occur, the regulations ensure

1 that there are protocols in place to contain the spills and neutralize potential harmful
2 impacts. Vessel discharges could include legal discharges (e.g., ballast water), illegal
3 discharges (e.g., bilge water, gray water, oily wastes), and leachates from hulls
4 (antifouling compounds, rust, etc. Discharges of polluted water (such as bilge water or
5 gray water) or polluted ballast water directly to the Harbor are prohibited under the Port
6 tariff and other regulations. As there is no evidence that such discharges are causing
7 measurable degradation of Harbor water quality, the related projects are not considered to
8 have a significant cumulative impact.

9 **Contribution of the Proposed Project**

10 In-water construction activities, such as dredging, pile removal and installation, and
11 shoreline excavation, would re-suspend bottom sediments and could result in decreased
12 dissolved oxygen and pH and increased nutrient and contaminant inputs. In addition,
13 spills and leaks from construction equipment could affect water quality in the vicinity of
14 the Proposed Project. As discussed in Section 3.13.4.3, receiving water monitoring
15 studies of dredging and other in-water construction activities have documented a
16 relatively small plume of turbidity that dissipates rapidly with distance. In addition,
17 construction would include standard measures for spill prevention and storm water runoff
18 control that would minimize the potential for pollutants to reach Harbor waters and
19 adversely affect water quality. Operation of the Proposed Project would not result in any
20 direct discharges of wastes or wastewaters to the Harbor, and accidental spills would be
21 minimized through compliance with applicable federal, state, and local laws and
22 regulations. Stormwater runoff from the terminal would be governed by incorporate
23 operational and structural BMPs in accordance with the requirements of the GIASP and
24 MS4 permit and City of Los Angeles LID ordinance requirements.

25 Because neither construction nor operation of the Proposed Project would have
26 significant impacts on water quality, and in view of the minor increase in vessel traffic
27 relative to overall vessel traffic, the Proposed Project would not make a cumulatively
28 considerable contribution to a significant cumulative impact related to water quality
29 standards, contamination, or nuisance.

30 **Contribution of the Alternatives**

31 Because Alternative 1 (No Project) would not include any construction, Alternative 1
32 would not make a cumulatively considerable contribution to a significant cumulative
33 impact under CEQA related to construction. Further, for the same reasons as described
34 for the Proposed Project, operations under Alternative 1, including increased container
35 throughput and increased vessel traffic, are not expected to create pollution,
36 contamination, or a nuisance, or result in violations of water quality standards or permit
37 conditions. Accordingly, Alternative 1 operations would not make a cumulatively
38 considerable contribution to a significant cumulative impact under CEQA related to
39 causing regulatory standards to be violated in Harbor waters from operational activities.
40 Alternative 1 is not required to be analyzed under NEPA.

41 Under Alternative 2 (No Federal Action) only backlands improvements (expansion of the
42 WBICTF on-dock railyard) would be constructed. Accordingly, for the same reasons as
43 described for the Proposed Project, construction of Alternative 2 would not make a
44 cumulatively considerable contribution to a significant cumulative impact under CEQA.
45 Further, for the same reasons as described for the Proposed Project, operations under
46 Alternative 2 would not create substantial pollution, contamination, or a nuisance, or
47 result in violations of water quality standards or permit conditions. Therefore, operation

1 of Alternative 2 would not make a cumulatively considerable contribution to a significant
2 cumulative impact under CEQA. Alternative 2 would result in no impact under NEPA
3 because it would be identical to the NEPA baseline.

4 **Mitigation Measures and Residual Cumulative Impacts**

5 Neither the Proposed Project nor any alternative would make a cumulatively considerable
6 contribution to a significant cumulative impact under CEQA or NEPA relative to water
7 quality. Therefore, no mitigation measures would be required.

8 **Cumulative Impact WQ-3: Would the Proposed Project or alternatives** 9 **contribute to a cumulatively considerable alteration of the existing** 10 **drainage pattern of the site or area, including through the alteration** 11 **of the course of a stream or river or through the addition of** 12 **impervious surfaces, in a manner which would:**

- 13 i) **result in substantial erosion or siltation on- or off-site;**
14 ii) **substantially increase the rate or amount of surface runoff in a**
15 **manner which would result in flooding on- or offsite;**
16 iii) **create or contribute runoff water which would exceed the**
17 **capacity of existing or planned stormwater drainage systems**
18 **or provide substantial additional sources of polluted runoff; or**
19 **iv) impede or redirect flood flows?**

20 **Impacts of Past, Present, and Reasonably Foreseeable Future** 21 **Projects**

22 Past development has increased the amount of impervious surface area within the Harbor
23 subwatershed, and has also included installation of storm drain and flood control systems
24 to collect and convey stormwater runoff in the area. These systems have mitigated the
25 impacts of past development with respect to erosion and flooding potential. Cumulative
26 related projects would affect the flooding potential (relative to both the CEQA and NEPA
27 baselines) only if the increased runoff volumes or altered drainage patterns exceeded the
28 capacity of the storm drainage system to convey runoff of excess water volumes off site.
29 There are no cumulative projects in the subwatershed with the potential to affect drainage
30 patterns and runoff volumes. Furthermore, new developments, particularly in backlands
31 areas, emphasize decreasing impervious areas, with the goal of reducing volumes of
32 stormwater runoff. Consequently, the past, present, and reasonably foreseeable future
33 projects would not result in a significant cumulative impact related to drainage patterns.

34 **Contribution of the Proposed Project**

35 As discussed in Section 3.13.4.3, neither construction nor operation of the Proposed
36 Project would increase the potential for flooding because the existing on-site storm
37 drainage conveyance and treatment system is adequate to handle runoff from the Berths
38 121-131 Terminal, and total impervious area and existing overland drainage paths would
39 not change. Accordingly, the Proposed Project would not make a cumulatively
40 considerable contribution to a significant cumulative impact regarding flooding.

1 **Contribution of the Alternatives**

2 For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would
3 not make a cumulatively considerable contribution to a significant cumulative impact
4 under CEQA. Alternative 1 is not required to be analyzed under NEPA and Alternative 2
5 would result in no impact under NEPA because it is identical to the NEPA baseline.

6 **Mitigation Measures and Residual Cumulative Impacts**

7 Neither the Proposed Project nor any alternative would make a cumulatively considerable
8 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
9 mitigation measures would be required.

10 **Cumulative Impact WQ-4: In flood hazard, tsunami, or seiche zones, 11 would the Proposed Project or alternatives contribute to a 12 cumulatively considerable risk of release of pollutants due to 13 inundation?**

14 **Impacts of Past, Present, and Reasonably Foreseeable Future 15 Projects**

16 As discussed in Section 3.13.4.3, in the unlikely event of a major tsunami or seiche,
17 inundation of substantial areas of the Port Complex would not occur. Sea level rise (SLR)
18 is assumed to increase the severity of inundation by tsunamis. As discussed in Section
19 3.13.4.3, the Port has evaluated inundation scenarios that incorporate conservative
20 assumptions of SLR and storm tide scenarios. In those scenarios, low-lying Port facilities,
21 which could include some of the related projects, would experience various degrees of
22 inundation. Related projects farther inland, such as in Carson and Harbor City, would
23 likely not be seriously affected either by SLR or by tsunamis.

24 Construction of the related projects would incorporate the controls required by
25 construction permits (e.g., construction SWPPPs and associated BMPs), which would
26 minimize the risk of the release of pollutants due to inundation by floods, tsunamis, or
27 seiches. Operation of the related projects would involve the use of potential pollutants
28 such as fuels and lubricants, and hazardous cargos, feedstocks, and products. However,
29 the controls required by applicable permits, business plans, packaging and transportation
30 rules, and emergency response plans would minimize the risk of release of those
31 pollutants. Accordingly, the related projects would not result in a significant cumulative
32 impact related to risk of pollutant release due to inundation.

33 **Contribution of the Proposed Project**

34 As described in Section 3.13.4.3, the Proposed Project would not alter flood flows or
35 tsunami pathways or increase the probability or severity of flooding, tsunamis, seiches, or
36 inundation because the general configuration of the terminal would be unchanged.
37 Furthermore, the potential for the Berths 121-131 Terminal to be substantially affected
38 during its operational life by flooding, tsunami, or seiche is remote. BMPs during
39 construction and operation would limit the potential for release of pollutants, even during
40 flooding or other inundation. Accordingly, the risk of release of pollutants as a result of
41 flooding or other inundation would not be increased, and the Proposed Project would not
42 make a cumulatively considerable contribution to a significant cumulative water quality
43 impact under both CEQA and NEPA.

Contribution of the Alternatives

Under Alternative 1 there would be no new construction and, as described in Section 3.13.4.3, the potential for the Berths 121-131 Terminal to be substantially affected by flooding, tsunami, or seiche is remote. Accordingly, Alternative 1 would not be expected to contribute to cumulatively considerable impacts under CEQA related to release of pollutants due to flooding or other inundation. Alternative 1 is not required to be analyzed under NEPA.

For the same reasons as the Proposed Project, construction of Alternative 2's backlands improvements would not substantially increase the risk of release of pollutants during inundation events. Operational activities and the configuration of the terminal would closely resemble baseline conditions and would not increase the probability or severity of flooding, tsunamis, seiches, or site inundation. Accordingly, Alternative 2 would not be expected to contribute to cumulatively considerable impacts under CEQA related to surface water movement. Alternative 2 would result in no impacts under NEPA because it is identical to the NEPA baseline.

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor any alternative would make a cumulatively considerable contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no mitigation measures would be required.

Cumulative Impact WQ-5: Would the Proposed Project or alternatives contribute to a cumulatively considerable conflict with or obstruction of the implementation of a water quality control plan or sustainable groundwater management plan?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Surface waters in the Port area are predominantly marine and are governed by the Los Angeles Region Water Quality Control Plan (Basin Plan, LARWQCB 2014). The Basin Plan designates beneficial uses of the waters of Inner Los Angeles Harbor (which includes the Project site), as: industrial service supply, navigation, noncontact water recreation, commercial and sportfishing, marine habitat, and preservation of rare and endangered species. The related projects in the Port area have been or will be constructed in accordance with regulatory standards and requirements, which ensure that construction activities do not produce conditions such as pollutant release that would obstruct implementation of the Basin Plan. Monitoring in recent years (see Section 3.13.2) has demonstrated good water quality in most of the Port, indicating that, in general, Port activities do not conflict with the water quality objectives of the Basin Plan. Legacy sediment contamination exceeds sediment quality objectives in some areas of the Port, but the related projects in Table 4-1 do not contribute to that contamination; in fact, to the extent contaminated sediments have been or could be removed during construction, some of the related projects promote implementation of the Plan.

As described in Section 3.13.2, the Port area is underlain by groundwater that has been influenced by seawater intrusion. There are no designated beneficial uses for groundwater beneath the Port, and the area is not designated for a groundwater management plan. Accordingly, related projects in the Port area do not conflict with a groundwater management plan.

1 Because the Project area is not included in a groundwater management plan and the
2 related projects would not conflict with or obstruct the Basin Plan, the related projects
3 would not result in significant cumulative impacts related to erosion or sedimentation.

4 **Contribution of the Proposed Project**

5 As described in Section 3.13.4.3, the Project site is not included in a groundwater
6 management plan, and the Proposed Project would not conflict with or obstruct
7 implementation of the Basin Plan. Because the related projects do not represent a
8 significant cumulative impact and the size of the terminal, construction of the Proposed
9 Project would not have substantial adverse effects on beneficial uses, and the types of
10 activities that would occur during operations would be essentially the same as baseline
11 conditions, the Proposed Project would not make a cumulatively considerable
12 contribution to a significant cumulative impact under CEQA or NEPA.

13 **Contribution of the Alternatives**

14 For the same reasons as described for the Proposed Project, Alternatives 1 and 2 would
15 not make a cumulatively considerable contribution to a significant cumulative impact
16 under CEQA related to implementation of the Basin Plan. Alternative 1 is not required to
17 be analyzed under NEPA and Alternative 2 would result in no impact under NEPA
18 because it is identical to the NEPA baseline.

19 **Mitigation Measures and Residual Cumulative Impacts**

20 Neither the Proposed Project nor any alternative would make a cumulatively considerable
21 contribution to a significant cumulative impact under CEQA or NEPA. Therefore, no
22 mitigation measures would be required.

23 **4.2.14 Marine Transportation**

24 **4.2.14.1 Scope of Analysis**

25 The Proposed Project would allow larger container vessels (capacities of up to 14,000
26 TEUs) to call at the Berths 121-131 Terminal than occurred during the baseline (up to
27 6,500 TEUs) because one of the two wharves (i.e., Berths 126-129) would be replaced
28 with a wharf capable of supporting larger cranes, and the berth would be to accommodate
29 larger vessels. Like all commercial vessels, these ships would follow designated traffic
30 channels (also used by other vessels) when approaching and leaving the Harbor (see
31 Figure 3.14-1). Because the Proposed Project has the capacity to affect vessel
32 transportation only within authorized navigation channels and the berths that the vessels
33 are accessing, the region of analysis for cumulative marine transportation impacts
34 consists of the Precautionary Area outside the Port, the Main Channel, the Turning Basin,
35 and the West Basin.

36 The cumulative impacts include those impacts from past, present, and reasonably
37 foreseeable future projects that would increase the number and size of vessels using these
38 navigational areas.

39 **Cumulative Impact VT-1: Would vessel traffic associated with**
40 **construction and operation of the Proposed Project or alternatives**
41 **result in a cumulatively considerable interference with the operation**

1 **of designated vessel traffic lanes and impair the level of safety for**
2 **vessels navigating the Main Channel, Harbor, or Precautionary Area?**

3 **Impacts of Past, Present, and Reasonably Foreseeable Future**
4 **Projects**

5 Past projects within the vicinity of the Proposed Project have deepened navigation
6 channels and upgraded wharf infrastructure to accommodate modern container ships.
7 These Port developments have been undertaken to accommodate the needs of foreign and
8 domestic waterborne commerce.

9 Present and reasonably foreseeable Port of Los Angeles projects, specifically other
10 marine terminal and navigational safety projects, could have impacts on marine vessel
11 safety if they introduce construction equipment and additional vessels to navigational
12 areas that interfere with USCG-designated vessel traffic lanes and vessel safety in
13 general. Those projects (Table 4-1) include the Berth 163-164 [NuStar-Valero] Marine
14 Oil Terminal (#1), Berths 191-194 [Ecocem] Low-Carbon Cement Processing Facility
15 (#3), Berths 97-109 [China Shipping] Development Project (#6), Maintenance Dredging
16 (#13), Outer Harbor Cruise Terminal (#14), Berths 302-306 [APL] Container Terminal
17 (#21), Berths 238-239 [PBF Energy] Marine Oil Terminal Improvement Project (#22),
18 and Berths 167-169 [Shell] Marine Oil Terminal (#24); all would either add vessel traffic
19 or involve work within a Port of Los Angeles navigational channel. Port of Long Beach
20 projects would not affect navigational safety in the Port of Los Angeles to any substantial
21 degree and are therefore not included in this analysis.

22 The related projects will handle additional cargo as the throughput of the Port Complex
23 increases (see Chapter 1, Introduction). This increase could lead to increased vessel calls,
24 although the trend of increasing vessel size may partially or wholly offset increases in
25 cargo volumes (vessel traffic has actually decreased in the past 20 years [Table 3.14-3],
26 even as the number of cargo containers nearly tripled). As described in Section 3.14.1.1,
27 vessel traffic is regulated by the USCG Captain of the Port (COTP) and the Marine
28 Exchange of Southern California via the Vessel Traffic Service (VTS) to promote safety
29 and ensure that the total number of vessels transiting the Port does not exceed the design
30 capacity of the federal channels. Regulated navigation areas (RNAs), the Traffic
31 Separation Scheme (TSS), the Harbor Safety Plan (HSP), and the Port Tariff requirement
32 that most oceangoing vessels use Los Angeles Port Pilots, further ensure that vessels
33 navigate safely near and within the Harbor. In addition, construction projects must
34 comply with USCG rules and USACE permit conditions designed to minimize conflicts
35 between construction activities and routine vessel traffic.

36 As described in Section 3.14.2.2, in the period 2017-2022 the Harbor Safety Committee
37 reported an average of 13 vessel incidents (mostly engine problems) per year and no
38 allisions, collisions or groundings. This safety record indicates that, with the continued
39 implementation of the VTS, oversight by the COTP and Marine Exchange, and use of
40 Port Pilots, past, present, and reasonably foreseeable related projects would not represent
41 a significant cumulative impact related to navigation hazards.

42 **Contribution of the Proposed Project**

43 The construction phase of the Proposed Project would involve the use of construction
44 vessels and equipment to conduct dredging, dredged material disposal, crane installation,
45 shoreline reconstruction, and wharf demolition and construction activities within the
46 West Basin. In-water/over-water construction activities are routinely conducted in the

1 Port, and contractors performing such construction are subject to applicable rules and
2 regulations stipulated in all LAHD contracts and USACE permits as described above.
3 Because standard safety precautions would be utilized by all contractors, the use of
4 derrick barges for pile removal/installation, wharf construction, dredging; dump scows
5 and tugboats for conveying dredged material, and general cargo ships to deliver crane
6 would not substantially affect marine vessel safety in the West Basin, Main Channel,
7 Precautionary Area, and connected channels and basins.

8 In the operation phase, the Proposed Project would result in additional vessel traffic in
9 the navigational areas relative to the CEQA baseline (156 in 2050 versus 153 in 2019).
10 Consequently, the Proposed Project, in combination with the related projects, could
11 potentially increase the risk of vessel traffic hazards. However, the increase would be
12 insubstantial in the context of overall Port traffic (1,867 in 2019); in addition, continued
13 implementation of the VTS, oversight by the COTP and Marine Exchange, adherence to
14 the HSP regulations, and use of Port Pilots would ensure that the level of vessel safety
15 would not be impaired.

16 With the existing safeguards, neither construction nor operation of the Proposed Project
17 would make a cumulatively considerable contribution to a significant cumulative impact
18 relative to vessel traffic or navigational safety under CEQA or NEPA.

19 **Contribution of the Alternatives**

20 For the same reasons as described for the Proposed Project, Alternatives 1 (No Project)
21 and 2 (No Federal Action) would not make a cumulatively considerable contribution to a
22 significant cumulative impact under CEQA related to vessel traffic or navigational safety.
23 Alternative 1 is not required to be analyzed under NEPA and Alternative 2 would result
24 in no impact under NEPA because it is identical to the NEPA baseline.

25 **Mitigation Measures and Residual Cumulative Impacts**

26 Neither the Proposed Project nor any alternative would make a cumulatively considerable
27 contribution to a significant cumulative marine transportation impact under CEQA or
28 NEPA. Therefore, no mitigation measures would be required.

29 **4.2.15 Other Resource Areas**

30 The Initial Study for the Proposed Project (Appendix 2 of the Draft EIS), published in
31 April, 2014, determined that impacts in a number of issues in the CEQA Appendix G
32 checklist would be less than significant or that the Proposed Project would have no
33 impact, and would therefore not be addressed in the Draft EIR. Accordingly, those issues
34 are not included in Chapter 3 of this Draft EIR. LAHD has determined that it is
35 appropriate to consider whether those less-than-significant impacts may, when considered
36 in the context of related projects, make a contribution that is cumulatively considerable.

37 **Cultural Resources:** As described in the Initial Study (Section Vd), the remote
38 possibility of encountering human remains in the course of construction and the existing
39 procedures and safeguards that would be employed in such an event mean that the
40 Proposed Project would not make a cumulatively considerable contribution to a
41 significant cumulative impact.

42 **Geology and Soils:** Because the Initial Study (Section VII) concluded that impacts
43 related to all geology and soils, CEQA topics would be less than significant, the issue of
44 geology and soils is not considered in the Draft EIS/EIR. As described in the Initial Study

1 (Section VII), the Proposed Project would be designed and constructed in accordance
2 with LAHD seismic design and engineering criteria, including recommendations in a
3 geotechnical report prepared as part of the design process, to minimize potential damage
4 risks in the event of seismically-induced geologic hazards, including faulting, ground
5 shaking, and soil liquefaction and the potential for unstable or expansive soil conditions.
6 The facility would include emergency planning and response to mitigate the effects of
7 seismic events. The flat topography, established erosion controls, and largely paved
8 nature of the site would minimize the potential for erosion during construction and
9 operation. Accordingly, the Proposed Project would not make a cumulatively
10 considerable contribution to a significant cumulative impact.

11 **Public Services:** As described in the Initial Study (Section XIV), the Proposed Project
12 would not result in an increased demand for other public facilities (i.e., other than fire and
13 police protection, which are considered in this Draft EIS/EIR, and schools and parks,
14 which were dismissed from the analysis). Accordingly, the Proposed Project would not
15 make a cumulatively considerable contribution to a significant cumulative impact.

16 4.3 Comparison of Alternatives

17 Alternative 1 would not include any construction and therefore would not result in any of
18 the construction-related impacts associated with the Proposed Project. Alternative 2
19 would not include any dredging or construction activities in the water or in waterside
20 areas, nor the addition of any new wharf cranes, but expansion of the WBICTF on-dock
21 rail yard, with the addition of RMG cranes, would take place. These two alternatives
22 would result in minimal (Alternative 2) or no (Alternative 1) construction impacts, as
23 well as fewer operational impacts than the Proposed Project because cargo throughput
24 under these alternatives would be less than under the Proposed Project.

25 Significant operational impacts of Alternative 1 related to air quality, biology, and
26 greenhouse gases could not be mitigated, whereas for the Proposed Project and
27 Alternative 2 many of the significant impacts could be mitigated to less than significant.
28 General summaries of the resource areas to which the alternatives would make a
29 cumulatively considerable and unavoidable contribution to a significant cumulative
30 impact after mitigation are provided below and are based on the discussions in Section
31 4.2 above.

32 4.3.1 Alternative 1 – No Project

33 Alternative 1 would contribute to fewer cumulative impacts under CEQA than the
34 Proposed Project. NEPA impacts do not apply to Alternative 1 because NEPA does not
35 require analysis of a CEQA No Project Alternative. Alternative 1 would make
36 cumulatively considerable and unavoidable contributions to significant cumulative
37 impacts after mitigation in the following resource areas:

38 4.3.1.1 Air Quality

39 Emissions from Alternative 1 operations would make a cumulatively considerable and
40 unavoidable contribution to an existing significant cumulative impact for CO, NO_x, and
41 PM₁₀ under CEQA.

1 **4.3.1.2 Biological Resources**

2 Alternative 1 would make a cumulatively considerable and unavoidable contribution to a
3 significant cumulative impact relative to the potential introduction of non-native species
4 via ballast water discharge and vessel hull fouling under CEQA.

5 **4.3.1.3 Greenhouse Gas Emissions**

6 GHG emissions associated with operation of Alternative 1 would contribute to existing
7 levels and, therefore, would make a cumulatively considerable and unavoidable impact to
8 a significant cumulative impact relative global climate change under CEQA.

9 **4.3.2 Alternative 2 – No Federal Action**

10 Alternative 2 would contribute to fewer cumulative impacts than the Proposed Project
11 under CEQA due to its reduced level of construction and operations. Alternative 2 is the
12 same as the NEPA baseline and as such would not contribute to any cumulative impacts
13 under NEPA. Alternative 2 would make a cumulatively considerable and unavoidable
14 contribution to a significant cumulative impact after mitigation in the following resource
15 areas:

16 **4.3.2.1 Air Quality**

17 Emissions from Alternative 2 construction would make a cumulatively considerable and
18 unavoidable contribution to a significant cumulative impact for CO emissions during
19 construction and operation under CEQA.

20 **4.3.2.2 Biological Resources**

21 Alternative 2 would make a cumulatively considerable and unavoidable contribution to a
22 significant cumulative impact relative to the potential introduction of non-native species
23 via ballast water discharge and vessel hull fouling under CEQA.

24 **4.3.2.3 Greenhouse Gas Emissions**

25 GHG emissions from Alternative 2 would contribute to existing levels and, therefore,
26 would make a cumulatively considerable and unavoidable contribution to a significant
27 cumulative impact relative to global climate change under CEQA.