



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

January 27, 2026

Marshall Cyr
Environmental Specialist
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RE: MITIGATED NEGATIVE DECLARATION FOR THE ZERO EMISSIONS PORT ELECTRIFICATION OF OPERATIONS AND GRID RELIABILITY PROJECT DATED DECEMBER 17, 2025, STATE CLEARINGHOUSE NUMBER [2025120795](#)

Dear Marshall Cyr,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the Zero Emissions Port Electrification of Operations and Grid Reliability Project (Project). The Los Angeles Department of Water and Power (LADWP) proposes to increase the capacity of electricity distribution within the Port of Los Angeles (POLA) by installing 16 new 34.5 kilovolt underground distribution circuits. Electricity is currently supplied to POLA through the receiving station located at the Harbor Generating Station (HGS); however, the receiving station at HGS and the receiving station located in Wilmington will need to increase their electrical capacity to provide the additional 200 megavolt-amperes needed for the established port electrification goals. To accommodate the estimated increase in load, LADWP is proposing to expand the capacity of both Wilmington and HGS receiving stations by installing three new switching stations, and constructing a wet cooling tower within HGS to maintain existing generation capacity/ This is to ensure the reliability and resilience of

the City of Los Angeles's electrical power system while additional renewable generation, energy storage, distributed generation, and transmission system improvements are implemented. Project construction is anticipated to start in April 2026 and is anticipated to conclude in December 2030. There are several DTSC sites within the area and close proximity to the Project site.

BACKGROUND

IRP Site 5 is an undeveloped area near Reeves Avenue, Navy Way, and Nimitz Road by the Former LBNC gate. The area is currently used as a laydown yard and storage area for the construction of a new railroad line adjacent to the site.

IRP Site 5

From the late 1930s to 1968, IRP Site 5 was used as a skeet range and for disposal of solid waste, including bed frames, desks, fire brick, and construction debris from different sources at Former LBNC (Navy, 1999). IRP Site 5 is on the mainland of Former LBNC and is relatively flat and mostly undeveloped, except for a small parking area on the eastern portion of the site. The area is overlain with fill materials. The southern boundary of IRP Site 5 used to be shoreline and riprap (Navy, 1999) but was filled as part of the POLA development between 1999 and 2001. Total Dissolved Solid concentrations on the mainland of the Former LBNC are generally less than 3,000 mg/L (Navy, 1999), indicating reduced saltwater intrusion from the bay compared to the Navy Mole. Previous investigations identified IRP Site 5 as one of 12 potentially contaminated sites. In 1994, a Remedial Investigation (RI) (BNI, 1996) established two Areas of Potential Concerns (AOPC) for surface soil in the grass area (AOPC 1) and subsurface soil and groundwater across the site (AOPC 2) (Appendix E-13) (BNI, 1996). The results of the RI did not reveal significant soil or groundwater contamination. The only Constituents of Potential Concern exceeding statistical background concentrations in soils were arsenic and cobalt. Contaminants reported in the groundwater samples collected during the RI included chlorinated solvents and inorganics. The RI concluded that the concentrations of arsenic and cobalt within soil and groundwater at AOPC 1 and 2 fell within the range of

background conditions, and detections of chlorinated solvents were likely because of laboratory contamination; therefore, further investigation was not pursued.

IRP Site 6A

IRP Site 6A is open space that is partially paved and fenced. It is used for storage and is adjacent to rail lines. IRP Site 6A consisted of two main areas, a western scrap yard and an eastern vacant lot (Navy, 1999). Land filling began in the mid-1940s and continued in 1962 based on aerial photographs. Old boats, sandblast waste, and shipyard solid wastes were disposed of at this site, and waste oils may have been used for compaction and dust suppression (Navy, 1999). Previous investigations include a remedial site evaluation (DHS, 1989) and an RI. Results of the RI (BNI, 1996) did not reveal significant soil contamination at IRP Site 6A; although a low concentration dissolved VOC plume was identified during the RI and SFA (Appendix E-15) (BNI, 1997). A groundwater monitoring program was subsequently instituted at IRP Site 6A. In 1996, quarterly groundwater monitoring was performed at IRP Site 6A. In 1997, groundwater samples were collected from six monitoring wells at IRP Site 6A and analyzed for VOC, semi-volatile organic compounds, metals, cyanide, and total petroleum hydrocarbons.

IRP Site 6A is on the Main Station of Former LBNC. Features on the site include a highway off-ramp, a water tank, and railroad tracks. The Site is relatively flat and mostly undeveloped. The western half of IRP Site 6A is fully paved. The unpaved area consists of dirt, crushed gravel, and some vegetation, with a railway line intersecting the eastern portion. Although TDS concentrations within the upper few feet of the shallow water-bearing zone on the Main Station of the Former LBNC are generally less than 3,000 mg/L, indirect evidence, such as resistivity data, suggests TDS concentrations may increase at depths greater than 25 feet beneath IRP Site 6A (Navy, 1999).

IRP Site 5 and the western portion of IRP Site 6A were transferred to the POLA in 2000. The eastern portion of IR Site 6A (except the water tank parcel) was transferred to the POLB in 2001. The "Water Tank Parcel" was transferred to the POLB in 2004. The Reuse Plan developed by the Local Reviewing Agency of the

City of Long Beach designates future use of the land will remain industrial (City of Long Beach, 1995), and the properties will continue to be used for port activities. Based on the evaluation of remedial alternatives presented in the Record of Decision (Navy, 1999), ICs were selected as the remedy for IRP Sites 3 through 6A and groundwater monitoring at IRP Sites 5 and 6A.

DTSC recommends and requests consideration of the following comments:

1. The following practices be considered during subsurface construction activities in the vicinity of the [Roehl Disposal Services Site](#):
 - a. Field Screening: Conduct field screening, include using a photoionization detector during trenching and excavation activities. Document and evaluate any elevated readings, odors, or visible staining.
 - b. Regulatory Notification: Notify DTSC promptly if elevated concentrations of hazardous substances are encountered during construction activities.
 - c. Worker Health and Safety: Implement appropriate worker protection measures, including dust control, use of nitrile gloves and eye protection, minimization of open soil stockpiles, and implementation of best management practices to prevent off-site tracking of potentially contaminated materials.
2. Please find attached a plot plan of restricted use areas within the former [Long Beach Naval Center](#). Installation Restoration Program (IRP) Sites 5 and 6A are located within the boundaries of the Zero Emissions Port Electrification of Operations and Grid Reliability Project. These sites are subject to Institutional Controls (ICs) and are implemented to ensure industrial use of the land is maintained as follows:
 - a) Residential use shall be prohibited.
 - b) Site operations shall be restricted to industrial/commercial uses consistent with the California Coastal Act and the Certified Port Master Plan for Los Angeles and Long Beach Harbor Districts.
 - c) Industrial use shall not include child-care centers, playgrounds, or other areas frequented by children.

- d) Removal and disposal of contaminated soil or groundwater shall be conducted according to all applicable federal, state, and local regulations governing removal, transport, and disposal.
 - e) Construction and/or operations on the property shall not interfere with ongoing monitoring or assessment work being conducted by or for federal, state, or local regulatory agencies, unless specifically approved by the appropriate lead agency.
3. ICs were initiated in 1999 through the Lease in Furtherance of Conveyance to ensure a residential use restriction. When the property was transferred to the Port of Los Angeles (POLA) and Port of Long Beach (POLB) following completion of the Finding of Suitability to Transfer (NAVFAC SW, 1999), the Navy imposed restrictions on the transferee's use of the property through a Community Relations Utilization Plan that remain viable and honored by all subsequent owners (Navy, 2001, 2004b) and quitclaim deeds. And subsequently DTSC entered into a Land Use Covenant with the POLA and POLB to ensure the ICs are maintained in perpetuity under the DTSC and Los Angeles Regional Water Quality Control Board oversight.
4. In order to ensure that removal and disposal of contaminated soil or groundwater is conducted according to all applicable federal, state, and local regulations governing removal, transport, and disposal, DTSC and Los Angeles Regional Water Quality Control Board (LARWQCB) require a workplan describing construction activities including the soil and/or groundwater disturbing activities, a soil management plan, and a site specific health and safety plan. The POLA and POLB must require their contractors to prepare and submit the workplan for DTSC and LARWQCB approval at least 30 days before the anticipated work start date.
5. As soil and groundwater contamination are present at the Project site, DTSC recommends the preparation of a soil and groundwater management plan to provide procedures for handling and managing contaminated soil and groundwater, procedures for managing unanticipated contamination or

subsurface features, and mitigation measures for potential dust generation and tracking of contamination offsite. As the Project site is under LARWQCB oversight, a soil and groundwater management plan should be provided to the Water Board for review and approval.

6. If buildings, asphalt, or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).
7. DTSC recommends all imported soil/fill material be tested to ensure all contaminants of concern meet screening levels as outlined in [DTSC's PEA Guidance Manual](#). Furthermore, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC would like to thank you for the opportunity to comment on the MND for the Zero Emissions Port Electrification of Operations and Grid Reliability Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

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January 27, 2026
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Sincerely,



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LEGEND

- IRP Site Boundary
- Former Long Beach Naval Complex Boundary

Former Long Beach Naval Complex Location Map

Five-Year Review Report for Installation Restoration
Sites 1 Through 6A and 8 Through 14
Former Long Beach Naval Complex, Long Beach, California



Figure 1-3

NOTES:
IRP = Installation Restoration Program

IMAGERY SOURCE:
ESRI Online

