

Executive Summary

ES.1 Introduction and Background

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

ES.1.1 BACKGROUND TO THE SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

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

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

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

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

ES.1.2 SCOPE OF THE DRAFT SEIR

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

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

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

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

CEQA Baseline

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

Project Description

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

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

ES.1.3 PURPOSE OF THE DRAFT SEIR

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

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

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

ES.1.4 USES AND SCOPE OF THE SEIR

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

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

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

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

ES.1.5 PURPOSE AND NEED

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

ES.1.6 PROJECT OBJECTIVES

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

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

ES.2 Proposed Project

ES.2.1 PROJECT LOCATION AND SETTING

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

ES.2.2 SURROUNDING AND NEARBY LAND USE

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

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

ES.2.3 PROJECT DESCRIPTION

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

Phase 1 – Continued Operation

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

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

Phase 2 – Non-operational Restoration Period

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

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

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

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

ES.3 Environmental Impacts

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

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

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

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



FIGURE ES-1

Regional Location

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FIGURE ES-2

Local Vicinity

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ES.3.1 IMPACTS NOT CONSIDERED IN THE SEIR

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

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

ES.3.2 IMPACTS OF THE PROPOSED PROJECT

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

ES.3.2.1 Unavoidable Significant Impacts

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

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

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

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

ES.3.2.3 Summary of Less-than-Significant Impacts

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

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

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

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

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

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

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

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

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

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

ES.3.2.4 Mitigation Measures

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

Hazards:

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

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

ES.3.2.5 Standard Conditions of Approval

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

Cultural Resources

SC CR-1: Stop Work in the Area if Archaeological Resources Are Encountered. In the unlikely event that any prehistoric artifact of historic period materials or bone, shell or nonnative stone is encountered during restoration activities, work shall be immediately stopped, the area secured, and work relocated to another area until the found materials can be assessed by a qualified archaeologist. Examples of such cultural materials might include historical trash pits containing bottles and/or ceramics; structural remains or concentrations of grinding stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; and flakes of stone not consistent with the immediate geology such as obsidian or fused shale. The contractor shall stop construction within 30 feet of the location of these finds until a qualified archaeologist can be retained to evaluate the find. If the resources are found to be significant, they shall be avoided or shall be mitigated consistent with State Historic Preservation Officer Guidelines.

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

ES.3.2.6 Cumulative Impacts

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

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

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

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

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

ES.3.2.7 Significant Irreversible Changes to the Environment

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

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

ES.4 Public Comment Issues Raised

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

ES.5 Issues to be Resolved

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

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