

Chapter 4

Cumulative Analysis

Chapter Summary

This chapter evaluates the potential for the Proposed Project, together with other past, present, and reasonably foreseeable future projects in the geographic scope of each resource area, to make a cumulatively considerable contribution to a new or substantially more severe significant cumulative impact. Note that no alternatives are evaluated in this Draft Subsequent Environmental Impact Report (SEIR). Chapter 4, Cumulative Analysis, provides the following:

- A description of existing environmental setting in the Port area;
- A description of applicable local, state, and federal regulations and policies that apply to the cumulative impact analysis;
- A description of the past, present, and foreseeable future projects in the surrounding area;
- A discussion of the methodology used to determine whether the Proposed Project would make a cumulatively considerable contribution to a significant cumulative impact;
- An impact analysis of both the cumulative impacts related to the Proposed Project; and
- A description of any mitigation measures proposed to reduce any potential impacts and residual cumulative impacts, as applicable.

Key Points

The Proposed Project would not make a cumulatively considerable contribution to a cumulative impact when combined with other past, present, and reasonably foreseeable future projects in the following resource areas:

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

4.1 Introduction

This chapter presents the California Environmental Quality Act's (CEQA) requirements for a cumulative impact analysis and analyzes the potential for the Proposed Project to make a considerable contribution to a cumulative impact when combined with other past, present, and reasonably foreseeable future projects, compared to the cumulative impacts disclosed in the 1996 EIR. Following the presentation of the requirements related to the cumulative impact analyses and a description of the related projects (Section 4.1.1 and 4.1.2 respectively), the analysis in Section 4.2 addresses each of the resource areas analyzed in this Draft SEIR.

4.1.1 REQUIREMENTS FOR CUMULATIVE IMPACT ANALYSIS

The State CEQA Guidelines (14 California Code of Regulations 15130) require a reasonable analysis of the significant cumulative impacts of a Proposed Project. Cumulative impacts are defined by CEQA as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (State CEQA Guidelines, Section 15355).

Cumulative impacts are further described as follows:

- a. The individual effects may be changes resulting from a single project or a number of separate projects.
- b. The cumulative impacts from several projects are the changes in the environment, which result from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (40 Code of Federal Regulations 1508.7 and State CEQA Guidelines, Section 15355[b]).

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

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

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

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

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

The CEQA Guidelines set forth two methods, which may be use singly or in combination, for identifying related area projects with a potential to contribute, along with the Proposed Project, to cumulative impacts: the “list of projects” methodology (based on a list of past, present, and probable future projects producing related impacts) or the “summary of projections” methodology (based on a summary of projections in adopted local, regional or statewide plans, a related planning document, or an environmental document that has been adopted or certified) (Guidelines section 15130[b]). For this Draft SEIR, impacts are evaluated using a list of closely related projects that would be constructed in the cumulative geographic scope, which differs by resource and sometimes for impacts within a resource. The cumulative regions of influence are documented in Section 4.2 below. The list of related projects is provided in Table 4-1 in Section 4.1.2 below.

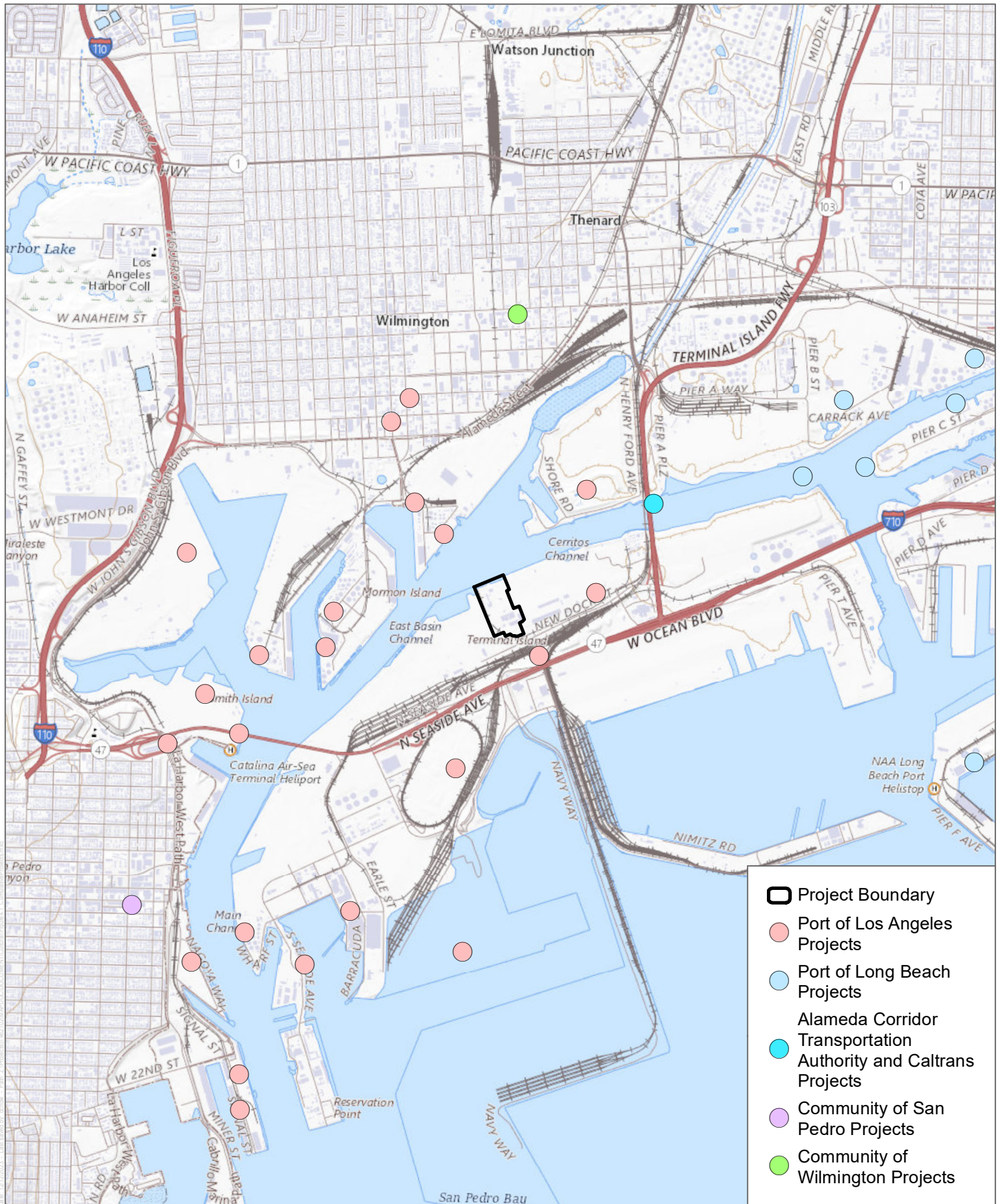
4.1.2 PROJECTS CONSIDERED IN THE CUMULATIVE ANALYSIS

A total of 42 current or reasonably foreseeable future projects (approved or proposed) were identified within the general vicinity of the Proposed Project that could contribute to cumulative impacts. The locations of these projects are shown in Figure 4-1. A corresponding list of the cumulative projects is provided in Table 4-1 compiled from sources that include the LAHD, the Port of Long Beach, Army Corps of Engineers, Alameda Corridor Transportation Authority and Caltrans Projects, Intermodal Container Transfer Facility (ICTF) Joint Powers Authority Los Angeles, Community of San Pedro, Community of Wilmington, the City of Carson, the City of Los Angeles and other local jurisdictions. As discussed in Section 4.1.1 and further in the resource-specific sections below, analysis of some resource areas uses a projection approach encompassing a larger cumulative geographic scope and, for these resources, a larger set of past, present, and reasonably foreseeable future projects was

included for analysis of cumulative impacts. This approach uses a summary of projections in an adopted planning document, or prior document that evaluates regional or areawide conditions.

For the purposes of this Draft SEIR, the Project vicinity is defined as the area over which effects of the Proposed Project could contribute to cumulative effects. The cumulative regions of influence for individual resources are documented further in each of the resource-specific subsections in Section 4.2.

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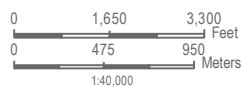


SOURCE: USGS 7.5-Minute Series Long Beach & Torrance Quadrangles

FIGURE 4.1

Locations of Related and Cumulative Projects

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



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Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
<i>Port of Los Angeles Projects</i>			
1.	Berth 163-164 [Nustar-Valero] Marine Oil Terminal Wharf Improvements Project	The project involves demolishing the existing 19,000-square-foot timber wharf and constructing a new, steel and concrete loading platform, access trestles, mooring and berthing structures, and necessary utilities to comply with the Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS). The project also consists of a 30-year lease for the facility.	IS/MND approved September 2021, Construction pending.
2.	Berth 191-194 (Ecocem) Low-Carbon Cement Processing Facility	Construction and operation of a dry bulk terminal for vessel unloading, raw material milling, and storage and loading onto trucks of low-carbon construction binder.	Notice of Preparation (NOP) released in March 2022. This is the Proposed Project
3.	Navy Way/Seaside Interchange Project	Construction of roadway improvements at SR-47/Navy Way to eliminate traffic signal and movement conflicts. The project would augment an existing partial interchange at SR 47/Seaside Avenue/Navy Way by removing the last traffic signal and at-grade intersection between Interstate [I]-710 and I-110, adding a new auxiliary lane and a new collector-distributor road, and implementing traffic channelization improvements.	Environmental review in process.
4.	Remove Ave. Marine Services Support Yard	Construction of roadway improvements at SR-47/Navy Way to eliminate traffic signal and movement conflicts. The project would augment an existing partial interchange at SR 47/Seaside Avenue/Navy Way by removing the last traffic signal and at-grade intersection between Interstate [I]-710 and I-110, adding a new auxiliary lane and a new collector-distributor road, and implementing traffic channelization improvements.	Environmental review in process.
5.	Westway Decommissioning	Decommissioning of the Westway Terminal along the Main Channel (Berths 70–71). Work includes decommissioning and removing 136 storage tanks with total capacity of 593,000 barrels and remediation of the site.	Decommissioning completed in 2013. Remediation planning underway.
6.	Berths 97–109, China Shipping Development Project	Development of the China Shipping Terminal Phase I, II, and III including wharf construction, landfill and terminal construction, and backland development, including operation under a revised project to modify certain mitigation measures.	Final Supplemental EIR (FSEIR) completed in 2019. Impact levels assumed in this Draft EIS/EIR are those disclosed in the FSEIR
7.	Berths 191-194 (Ecocem) Low-Carbon Cement Processing Facility	Construction and operation of a dry bulk terminal for vessel unloading, raw material milling, and storage and loading onto trucks of low-carbon construction binder.	NOP released in March 2022. EIR in preparation.
8.	Wilmington Waterfront Master Plan (Avalon Boulevard Corridor Project)	Planned development intended to provide waterfront access and promoting development specifically along Avalon Boulevard. Project elements include a promenade, waterfront park, pedestrian bridge, location for the Wilmington Youth Sailing and Aquatic Center, public pier, and other visitor serving uses.	Construction underway in phases.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
9.	Berth 44 Boatyard Project	The project includes redevelopment of the former San Pedro Boatworks site at 2945 Miner Street. Project components include demolition of existing structures and buildings on site; grading; paving; and constructing concrete pads, docks, gangways, slips, underground utilities, water treatment systems, storm drain, fencing, lighting, and buildings to support boatyard operations.	Environmental review in process.
10.	Berths 206-209 Chassis Depot and Repair Facilities	Use of existing warehouses at 849 E. New Dock St and 921 E. New Dock St for chassis depot, storage, maintenance and repair.	Final ND certified July 2019.
11.	Berths 121–131 Container Terminal Improvements Project	Demolish existing wharf at Berths 126-129, construct a new wharf, install up to 10 new wharf cranes, reconstruct the shoreline, dredge and dispose of up to 310,000 cy of sediments to deepen the berth, expand the existing on-dock railyard and install electric-powered RMG cranes for railcar loading/unloading.	NOI/NOP released in 2014. EIR/EIS in preparation.
12.	Berths 148-151 (Phillips 66) Marine Oil Terminal Improvement Project	Various wharf and seismic ground improvements that are required in order to comply with MOTEMS and a new 20-year entitlement.	IS/NOP released March 2022; EIR in preparation.
13.	Terminal Island Maritime support Facility	The project includes the development and operation of a maritime support facility on an approximately 80-acre LAXT loop site on Terminal Island.	Environmental review in process.
14.	Maintenance Dredging	Maintenance dredging is the routine removal of accumulated sediment from channel beds to maintain the design depths of navigation channels, harbors, marinas, boat launches, and port facilities. This is conducted regularly for navigational purposes (at least once every 5 years).	Continuous, but intermittent on average every 3–5 years.
15.	Outer Harbor Cruise Terminal and Outer Harbor Park	Construction of two new, cruise terminals that would total up to 200,000 square feet (approximately 100,000 square feet each) and parking at Berths 45–47 and 49–50 in the Outer Harbor. The terminals would be designed to accommodate the berthing of a Freedom Class or equivalent cruise vessel (1,150 feet in length). A proposed Outer Harbor Park would encompass approximately 6 acres at the Outer Harbor. This project was evaluated in the San Pedro Waterfront Project EIS/EIR certified in September 2009.	Draft Request for Proposal for future development released January 2023.
16.	City Dock No. 1 Marine Research Project (AltaSea)	This project includes development of a marine research center within a 28-acre area located between Berths 57–72. This project would change the break bulk areas east of East Channel (Berths 57–72) to institutional uses.	Phase I development in progress since 2017.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
17.	West Harbor Modification Project (formerly San Pedro Public Market)	This project includes redevelopment of 30 acres, formerly known as the Ports O' Call Village, which involves development of a 108,000-square-foot outdoor amphitheater, an entertainment venue 2.5 acres in size, a 100-foot-diameter Ferris wheel with an approximately 150-foot-tall by 50-foot-wide tower attraction and other visitor-serving commercial uses This project was evaluated in the San Pedro Waterfront Project EIS/EIR certified in September 2009.	NOP released in April 2022. Conceptual planning by private developer ongoing.
18.	Anchorage Road Soil Storage Site (ARSSS) Open Space	This project would create approximately 30 acres of passive open space at the ARSSS. The project may also include undergrounding utilities and roadway improvements at the Anchorage and Shore Road intersection.	On hold.
19.	SR-47/Vincent Thomas Bridge & Front St./Harbor Blvd. Interchange Reconfiguration	Reconfigure the existing interchange at State Route 47/Vincent Thomas Bridge and Harbor Boulevard/Front Street to improve safety and operation for vehicles exiting the highway. Improvements also include modifications of the eastbound entrance ramps and modification of Harbor Boulevard and Front Street approaching and between the ramp termini.	Design underway.
20.	Workforce Training Center	The project includes development of an approximately 20-acre site at 1440 Anchorage Road for a goods movement workforce training.	Environmental review in process.
21.	Al Larson Boat Shop Improvement Project	Modernization of existing boat yard and 30-year lease extension. This project was evaluated in a Final EIR approved in 2009.	Project on hold.
22.	Berths 302–306 [APL now known as Fenix Marine] Container Terminal Project	Improvements and expansion of the existing terminal, including the addition of cranes, modifications to the main gate, converting an existing dry container storage unit to a refrigerated unit, and the expansion of the terminal onto 41 acres adjacent to the existing terminal. Revised project includes continued operations with minor modifications to the terminal and a 15-year lease extension through 2043. This project was evaluated in a Final EIR in 2012 and Addendum in 2016.	Expansion project on hold, revised project ongoing.
23.	Berths 238-239 [PBF Energy] Marine Oil Terminal Improvement Project	Demolition of the existing Berth 238 loading platform and construction of a new platform and associated mooring structures at Berth 238, and installation of landside improvements.	Construction pending.
24.	Star-Kist Cannery Facility	Demolition of 14-acre site for future use as cargo support or container chassis storage.	BHC adopted Mitigated Negative Declaration February 2023; construction pending.
25.	Berths 167-169 [Shell] Marine Oil Terminal Wharf Improvements Project	Various wharf and seismic ground improvements that are required in order to comply with MOTEMS, as well as other landside elements and a new 30-year lease. This project was evaluated in a Final EIR approved in 2018.	Construction is pending.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
26.	Avalon and Fries Street Segments Closure Project	Physical closure of segments of Avalon Boulevard and Fries Avenue by installing street modifications that include cul-de-sacs, curbs and gutters, and fencing and signage.	Construction is pending.
27.	Avalon Freight Services Relocation Project	Shifting existing Catalina Island freight operations from Berth 184 in Wilmington to Berth 95 in San Pedro.	Construction pending.
28.	Berths 187-191 (Vopak) Liquid Bulk Terminal Wharf Improvements and Cement Terminal Project	Various wharf and improvements that are required in order to comply with MOTEMS, improvements to an adjacent wharf to facilitate resumption of cement terminal operations on the site, and a new 30-year entitlement.	IS/NOP issued July 2022. EIR in preparation.
<i>Port of Long Beach Projects</i>			
29.	Piers G & J Terminal Redevelopment Project, Port of Long Beach	Redevelopment of two existing marine container terminals into one terminal. The Piers G and J redevelopment project is in the Southeast Harbor Planning District area of the Port of Long Beach. The project will develop a marine terminal of up to 315 acres by consolidating two existing terminals on Piers G and J and several surrounding parcels. Construction will occur in four phases and will include approximately 53 acres of landfills, dredging, concrete wharves, rock dikes, and road and railway improvements.	Approved project. Construction ongoing.
30.	Pier B Rail Yard Expansion (On-Dock Rail Support Facility)	Expansion of the existing Pier B Rail Yard in two phases, including realignment of the adjacent Pier B Street and utility relocation.	FEIR certified February 2018. Construction pending.
31.	Mitsubishi Cement Corporation Facility Modifications	Facility modification, including the addition of a catalytic control system, construction of four additional cement storage silos, and upgrading existing cement unloading equipment on Pier F.	Project approved in April 2015. Construction commenced June 2021.
32.	Southern California Edison Transmission Tower Replacement Project	Replace a series of transmission towers across the Cerritos Channel.	FEIR certified in 2017. Construction completed in August 2021. Demolition of old towers underway.
33.	Toyota Facility Improvements Project	Construction of a new consolidated Vehicle Processing and Distribution Center, Hydrogen Call and Generator Facility, and Fueling Station. Demolition of some existing facilities.	Mitigated Negative Declaration adopted in 2018. Construction ongoing.
34.	World Oil Tank Installation Project	Installation and operation of two 25,000-barrel petroleum storage tanks.	Environmental review underway.
<i>Army Corps of Engineers</i>			
35.	Deep Draft Navigation and Main Channel Deepening Project	Dredge up to 10 million cubic yards of material to deepen channels, basins, and standby areas to improve waterborne transportation efficiencies and navigational safety for vessel operations. A new dredge substation may be constructed to provide electricity to dredge equipment.	FEIR/EIS underway.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
<i>Alameda Corridor Transportation Authority and Caltrans Projects</i>			
36.	Schuyler Heim Bridge Replacement and State Route (SR) 47 Terminal Island Expressway	ACTA/Caltrans project to replace the Schuyler Heim Bridge with a fixed structure and improve the SR-47/Henry Ford Avenue/ Alameda Street transportation corridor by constructing an elevated expressway from the Heim Bridge to SR 1 (Pacific Coast Highway [PCH]).	Construction completed. Elevated expressway deferred indefinitely.
<i>ICTF Joint Powers Authority</i>			
37.	Union Pacific Railroad ICTF Modernization and Expansion Project	Union Pacific proposal to modernize existing intermodal yard 4 miles from the Port.	Draft EIR on hold.
<i>Community of San Pedro Projects</i>			
38.	Pacific Corridors Redevelopment Project, San Pedro	Development of commercial/retail, manufacturing, and residential components. Construction underway of four housing developments and Welcome Park.	Project underway. Estimated 2032 completion year according to City of Los Angeles Planning Department.
<i>Community of Wilmington Projects</i>			
39.	Wilmington Redevelopment Plan Amendment/ Expansion Project, Wilmington	The existing Wilmington Industrial Park would be expanded by an additional 2,487 acres, for a total of approximately 2,719 acres. Under the probable maximum level of development, the overall project area could support up approximately 7,326 residential units (primarily multifamily; zone changes under the Plan would permit multi-use and higher density residential development). In addition to the residential development, the Project could accommodate up to approximately 207 acres (9 million square feet) of commercial development and up to 333 acres (14.5 million square feet) of industrial development.	NOP for Program EIR released for public review in August 2010. Currently on hold.
<i>City of Carson (north of Figure 4-1)</i>			
40.	Carson Stormwater and Runoff Capture Project	Excavation of a 1.5-acre parcel at Sepulveda Blvd and Figueroa St and installation of an underground stormwater storage facility and associated infrastructure to store up to 17 acre-feet of water.	Negative Declaration adopted 2017.
41.	Phillips 66 Los Angeles Carson Plant – Crude Oil Storage Capacity Project	Increase crude oil storage capacity at the Los Angeles Refinery Carson Plant by installing one new 615,000 barrel crude oil storage tank with a geodesic dome, increasing the annual permit throughput limit of two existing 320,000 barrel crude oil storage tanks, and installing geodesic domes on the same two existing 320,000 barrel crude oil storage tanks. Tie-ins to the Pier “T” crude oil delivery pipeline from Berth 121 would be installed.	Final ND approved December 2014. Currently under construction.

Table 4-1. Related and Cumulative Projects

No.	Project Title and Location	Project Description	Project Status
42	Shell Carson Facility Ethanol (E10) Project	Conversion of existing 69,000 bbl gasoline storage tanks to ethanol service. The EIR for this project included the following project objectives: 1. Increase the Carson Facility’s ethanol storage capacity by approximately 75%; 2. Increase ethanol tanker-truck loading capacity by at least 75%; 3. Include modifications that would minimize impacts to its existing capacity to receive, store and deliver other petroleum products at current levels; and 4. Maintain operational efficiency, safety and flexibility.	FEIR published December 2012.

4.2 Cumulative Impact Analysis

The following sections analyze the cumulative impacts identified for each resource area relative to the Proposed Project and the list of related projects identified in Table 4-1. The discussion of the impacts of past, present, and reasonably foreseeable future projects refers to the list of projects and reference numbers as shown in Table 4-1.

4.2.1 AIR QUALITY

4.2.1.1 Scope of Analysis

The region of analysis for cumulative effects on AQ-1 (regional air quality) is the South Coast Air Basin (SCAB). For AQ-2 (localized effects on air quality), the South Coast Air Quality Management District (SCAQMD) typically assesses cumulative projects within 1 mile of a project site. For AQ-4 (health effects), the area of influence includes the cumulative projects within the Port complex and their effects on the surrounding communities of San Pedro, Wilmington, and Long Beach. For AQ-3 (Odors) cumulative projects within 1 mile of the Project site will be assessed. For AQ-5 (Consistency with Applicable Plans) the area of influence includes the cumulative project within the Port complex.

4.2.1.2 Methodology and Baseline for Cumulative Air Quality Impacts

CEQA Baseline for Cumulative Air Quality Impacts

The CEQA Baseline is discussed in detail in Section 2.4.7 of Chapter 2, Project Description. In summary, the CEQA Baseline for the Proposed Project is existing operation in Fiscal Year 2021/2022. Emissions were calculated using the methodology discussed in detail in Section 3.1.4.

Criteria Pollutants

As described in Section 3.1, Air Quality and Meteorology, air quality within the SCAB has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly due to lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend towards cleaner air has occurred despite continued population growth. Even so, stationary industrial and mobile emission sources and topographical/meteorological conditions that inhibit atmospheric dispersion combine to create adverse pollution effects in the SCAB.

The U.S. Environmental Protection Agency (EPA) currently classifies the SCAB as in “extreme” nonattainment of the National Ambient Air Quality Standard (NAAQS) for ozone (O₃) (8-hour standard) and in “serious” nonattainment for fine particulate matter (PM_{2.5}) (24-hour standard) (CARB 2022). The SCAB is in attainment of the NAAQS for particulate matter (PM₁₀), carbon monoxide (CO), sulfur dioxide (SO₂), and nitrogen dioxide (NO₂) (CARB 2022).

The California Air Resources Board (CARB) currently classifies the SCAB as in nonattainment of the California Ambient Air Quality Standards (CAAQS) for O₃, PM₁₀, and PM_{2.5} (CARB 2022). The SCAB is in attainment of the CAAQS for NO₂, SO₂, CO, lead, and sulfates and is unclassified for hydrogen sulfide and visibility-reducing particles (CARB 2022). The 2022 South Coast Air Quality Management Plan (AQMP) predicts that the SCAB will reach attainment of the 2015 ozone 8-hour standard by 2037, but only if substantial reductions in nitrogen oxide (NO_x) emissions, especially from federally regulated sources such as heavy-duty trucks, trains, and oceangoing vessels, can be achieved (SCAQMD 2022).

Criteria pollutant emissions were calculated using the methodology presented in Section 3.1.4 and significance thresholds are presented in Section 3.1.5. The Proposed Project's contributions to cumulative impacts for criteria pollutants were assessed using SCAQMD's guidance, which states that projects that exceed SCAQMD's project-level significance thresholds are considered by the SCAQMD to be cumulatively considerable. Conversely, projects that do not exceed the project-level thresholds are not considered to be cumulatively considerable (SCAQMD 2003). Because SCAQMD guidance does not distinguish between attainment and nonattainment pollutants, this analysis assumes that for Cumulative Impacts AQ-1 and AQ-2 exceedance of any project-level threshold would also constitute a cumulatively considerable contribution.

Toxic Air Contaminants

According to SCAQMD's MATES V study, the cancer risk in 2018 from inhalation of toxic air contaminants (TAC) in the communities in the vicinity of the San Pedro Bay ports was estimated at 504 in one million (SCAQMD 2021). Although the MATES V results showed a 40% decrease in cancer risk from the MATES IV study in 2013 (SCAQMD 2015), and a basin-wide 84% decrease since the MATES II study in 1998 (SCAQMD 2000), health risk from air toxics in the port area remains elevated above the risks in communities elsewhere in the Basin.

To reduce Port-related cancer risks in adjacent communities, the Ports of Los Angeles and Long Beach approved Port-wide air pollution control measures through implementation of the San Pedro Bay Ports Clean Air Action Plan (CAAP), designed with the goal of reducing diesel particulate matter (DPM) emissions by 77%, compared to 2005 emissions, by 2023. In developing the San Pedro Bay Standards, the Port recognized the importance of ensuring that new projects are designed to be consistent with the CAAP as well as with other applicable regulations allowing the Port to meet long-term health risk and emission reduction goals. According to the latest report (POLA 2023), the Port has met the CAAP's emission reduction goals for DPM.

Notwithstanding, given the existing elevated cancer risk in communities surrounding the Port, this analysis assumes that any increase in health impacts (individual cancer risk, chronic hazard index, acute hazard index, population cancer burden) above the CEQA baseline, resulting from the Proposed Project, would be cumulatively considerable. TAC emissions were calculated using the methodology presented in Section 3.1.4 and significance thresholds are presented in Section 3.1.5.

4.2.1.3 Cumulative Impact AQ-1: Would the Proposed Project result in emissions that would make a cumulatively considerable contribution to regional air quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Phase 1 – Continued Operations of the Proposed Project would last for up to 10 years and would be followed by Phase 2 – Non-operational Restoration, which would consist of a decommissioning period lasting up to 5 years. During this time, numerous projects would occur concurrently at the Port and surrounding areas (see Table 4-1).

Construction and operation of projects identified in Table 4-1 would be cumulatively significant if their combined emissions would exceed the SCAQMD daily emission thresholds for construction and operation. Because this would almost certainly be the case for the majority of criteria pollutants and O₃ precursors, these projects would result in a significant cumulative air quality impact for PM₁₀, PM_{2.5}, NO_x, SO_x, CO and VOC.

Contribution of the Proposed Project

Criteria pollutant emissions associated with Phase 1 and Phase 2 of the Proposed Project are presented in Table 3.1-7. The table shows that emissions of all criteria pollutants would be less than the CEQA Baseline and as such would not exceed SCAQMD significance thresholds in any of the analyzed years.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project emissions would be less than the CEQA Baseline and would therefore not make a cumulatively considerable contribution to an existing cumulatively significant impact.

4.2.1.4 Cumulative Impact AQ-2: Would the Proposed Project result in ambient air pollutant concentrations that would make a cumulatively considerable contribution to localized air quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Phase 1 of the Proposed Project would last for up to 10 years and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years. During this time, numerous projects would occur concurrently at the Port and surrounding areas (see Table 4-1).

Construction and operation of projects identified in Table 4-1 would be cumulatively significant if their combined emissions would result in ambient pollutant concentrations that would exceed the NAAQS and CAAQS. Although there is no way to be certain if a cumulative exceedance of the thresholds would occur for any pollutant without performing dispersion modeling for each related project, cumulative air quality impacts are likely to exceed thresholds for PM₁₀, PM_{2.5}, and NO₂. Cumulative impacts are unlikely to exceed the thresholds for CO and SO₂ because the SCAB is in attainment for CO and SO₂, and project-level modelling evaluations for other large Port projects have calculated levels well below CO and SO₂ thresholds. Consequently, construction and operation of projects identified in Table 4-1 are assumed to result in a significant cumulative air quality impact for PM₁₀, PM_{2.5}, and NO₂.

Contribution of the Proposed Project

The SCAQMD developed the Localized Significance Thresholds (LST) methodology to aid CEQA lead agencies in assessing localized air quality impacts from Proposed Projects. This screening methodology, based on on-site emissions, emission area, ambient air quality, and distance to the nearest exposed individual, enables a determination of whether a project would cause or contribute to exceeding air quality standards without the need for a dispersion modeling analysis. The LST is presented in look-up tables for various pollutants, and if on-site emissions fall below the specified levels, the proposed activity is considered compliant with ambient air quality standards.

Criteria pollutant emissions, from on-site activities, associated with Phase 1 and Phase 2 of the Proposed Project are presented in Table 3.1-8. The table shows that emissions would be less than the CEQA Baseline, as such would not exceed SCAQMD LST significance thresholds, and would therefore not exceed ambient air quality standards in any of the analyzed years.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project emissions would be less than the CEQA Baseline and would therefore not make a cumulatively considerable contribution to an existing cumulatively significant impact.

4.2.1.5 Cumulative Impact AQ-3: Would the Proposed Project result in other emissions (such as those leading to odors) that would make a cumulatively considerable contribution that would adversely affect a substantial number of people?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Phase 1 of the Proposed Project would last for up to 10 years and would be followed by Phase 2, which would consist of a decommissioning period lasting up to 5 years. During this time, numerous projects would occur concurrently at the Port and surrounding areas (see Table 4-1). Construction and operation of the cumulative projects identified in Table 4-1 would be cumulatively significant if their combined emissions would result in emissions leading to odors by creating a nuisance under SCAQMD Rule 402.

Contribution of the Proposed Project

The existing industrial setting of the Proposed Project represents an already complex odor environment. As discussed in detail in Section 3.1.6, Impact Determination, odors from Phase 1 and Phase 2 activities of the Proposed Project would be similar to odors produced from existing industrial activities and would be primarily associated with vessels berthed at the terminal and on-site mobile equipment exhaust. Within this context, the Proposed Project would not likely result in changes to the overall odor environment in the vicinity. The distances between Proposed Project emission sources and the nearest sensitive receptors, possible residents at the marina in the East Basin, are far enough away to allow for adequate dispersion of these emissions to below objectionable odor levels. Since the Proposed Project would not result in nuisance odors under SCAQMD Rule 402, it would not result in a cumulatively considerable contribution to odors.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project emissions would not make a cumulatively considerable contribution to odor emissions.

4.2.1.6 Cumulative Impact AQ-4: Would the Proposed Project result in exposure to TACs that would make a cumulatively considerable contribution to human health?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Although the SCAQMD MATES studies have documented substantial decreases in cancer risk to Port-area populations over the past 20 years, health risk from air toxics in the port area remains elevated compared to many other communities in the SCAB. Consequently, projects identified in Table 4-1 are assumed to result in a significant cumulative impact to cancer risk from TAC exposure. In addition, non-cancer chronic and acute impacts associated with these projects are also assumed to result in significant cumulative impacts from TAC exposure.

As described in Section 3.1.3, Air Quality Regulatory Setting, the Port has approved port-wide air pollution control measures through the CAAP (POLA and POLB 2010, 2017). Implementation of those measures would reduce the health risk impacts from the Proposed Project and future projects at the Port. Existing regulations and future rules proposed by CARB and the U.S. EPA (see Section 3.1.3) would also further reduce air emissions and associated cumulative health impacts from Port operations. However, because future proposed measures (other than CAAP measures) and rules have not been adopted, they have not been accounted for in the emission calculations or health risk evaluation for the Proposed Project. Therefore, it is unknown at this time how those future measures would reduce cumulative health risk impacts within the Project area. Accordingly, airborne cancer and non-cancer impacts within the Project region may be considered to be cumulatively significant.

Contribution of the Proposed Project

As discussed in detail in Section 3.1.6, Phase 1 activities would result in emissions from engine exhaust in the form of DPM and TAC emissions from vessel and tugboat activity, vehicle activity, and on-site metal processing/handling. Since Phase 1 activity would remain unchanged from the CEQA Baseline, corresponding TAC emissions would either stay the same or be lower than the CEQA Baseline; emission reductions would be expected due to the adoption of cleaner engines and electrification in compliance with regulatory requirements.

Phase 2 activities would also generate DPM and TAC emissions from vessel and tugboat activity, vehicle activity, and on-site metal processing/handling. However, Phase 2 would involve the use of only one vessel on a single day, compared to 28 vessels annually associated with Phase 1 and the CEQA Baseline. Phase 2 non-vessel activities would be a fraction of Phase 1 and CEQA Baseline emissions. Consequently, Phase 2 activities would be less intensive and result in lower TAC emissions compared to both Phase 1 activities and the CEQA Baseline.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project impacts would be less than the CEQA Baseline and would therefore not make a cumulatively considerable contribution to an existing cumulatively significant impact.

4.2.1.7 Cumulative Impact AQ-5: Would the Proposed Project result in a cumulatively considerable contribution to a conflict with or obstruction of implementation of an air quality plan?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Phase 1 of the Proposed Project would last for up to 10 years and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years. During this time, numerous projects would occur concurrently at the Port and surrounding areas (see Table 4-1). Construction and operation of the cumulative projects identified in Table 4-1 would be cumulatively significant if their combined construction and operation would result in emissions that would conflict with or obstruct SCAQMD's 2022 South Coast AQMP.

The 2022 South Coast AQMP and prior iterations include emission reduction measures that are designed to bring the SCAB into attainment of the state and national ambient air quality standards. The 2022 South Coast AQMP contains attainment strategies that include mobile source control measures and clean fuel projects that are enforced at the state and federal levels on engine manufacturers and petroleum refiners and retailers. SCAQMD also adopted AQMP control measures

into the SCAQMD rules and regulations, which are then used to regulate sources of air pollution in the SCAB. The cumulative projects identified in Table 4-1 would be required to comply with all such requirements and regulations, to be consistent with the AQMP, and to implement all feasible mitigation measures should a significant project-related and/or cumulative impact be identified. As such, these projects should not produce cumulative impacts with adherence to the existing AQMP.

Contribution of the Proposed Project

As discussed in detail in Section 3.1.6, the Phase 1 and Phase 2 activities of the Proposed Project would result in emissions of nonattainment criteria pollutants, primarily from diesel combustion exhaust in vessels, tugboats, trucks, and on-site equipment. Similar to the cumulative projects identified in Table 4-1, Phase 1 and Phase 2 activities would comply with the 2022 South Coast AQMP control measures and all SCAQMD rules and regulations, which are used to regulate sources of air pollution in the SCAB. Compliance with these control measures, rules and requirements would ensure that the Phase 1 and Phase 2 activities would not obstruct implementation of the AQMP. Thus, the Proposed Project would not produce cumulatively considerable impacts that would obstruct or conflict with an air quality plan.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project impacts would not make a cumulatively considerable contribution that would obstruct or conflict with an air quality plan.

4.2.2 CULTURAL RESOURCES

4.2.2.1 *Cumulative Impact CR-1: Would the Proposed Project result in a cumulatively considerable contribution to the change of significance of a historic resource as defined in CEQA Guidelines Section 15064.5?*

A cumulative Impact to built environment historical resources, refers to the mounting aggregate effect upon historic resources due to modern or recent historic land use that result from human acts. The issue that must be explored in a cumulative impact analysis is the aggregate loss of information and the loss of recognized cultural landmarks and vestiges of a community's cultural history.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. There are 42 projects identified for cumulative analysis as shown in Table 4-1 and illustrated in Figure 4-1. The closest cumulative project to the Project site is approximately less than 0.25 miles south of the Proposed Project site (see Table 4-1 and Figure 4-1). Phase 1 of the Proposed Project would involve up to 10 years of continued operations, and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years and would involve the demolition of all on-site structures. During this time, numerous cumulative projects identified on Table 4-1 would occur concurrently at the Port and surrounding areas.

Ongoing development and growth in the broader Project area may result in a cumulatively significant impact to historically significant resources due to the continuing demolition and alteration of structures to accommodate new development areas that could potentially contain significant historic resources. The Proposed Project would be required to comply with all federal, state, and local requirements related to historical resources. Other related cumulative projects would similarly be required to comply with all such requirements and regulations, to be consistent with the provisions set forth by CEQA and

the CEQA Guidelines, and to implement all feasible mitigation measures should a significant project-related and/or cumulative impact to historic resources be identified. As such, cumulative impacts should be less than significant with adherence to existing regulatory requirements.

Contribution of the Proposed Project

As discussed in Section 3.2, Cultural Resources, no built environment CEQA historical resources were identified on the Proposed Project site or in the Proposed Project Area. Therefore, there are no new impacts to CEQA Historical Resources with the implementation of the Proposed Project. Consequently, the Proposed Project would not result in a cumulatively considerable contribution to a change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. All construction projects would have to adhere to applicable regulatory requirements regarding historic resources and the Proposed Project would not result in impacts to historic resources. As such, cumulatively considerable impacts would not occur.

4.2.2.2 Cumulative Impact CR-2: Would the Proposed Project cause a cumulatively considerable contribution to the change of significance of an archaeological pursuant to CEQA Guidelines Section 15064.5?

A cumulative impact to archaeological resources refers to the mounting aggregate effect upon cultural resources due to modern or recent historic land use that result from human acts or natural acts such as erosion. The issue that must be explored in a cumulative impact analysis is the aggregate loss of information and the loss of recognized cultural landmarks and vestiges of a community's cultural history.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. There are 42 projects identified for cumulative analysis as shown in Table 4-1 and illustrated in Figure 4-1. The closest cumulative project to the Project site is approximately less than 0.25 miles south of the Proposed Project site (see Table 4-1 and Figure 4-1). Phase 1 of the Proposed Project would involve up to 10 years of continued operations, and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years and would involve the demolition of all onsite structures, removal of all pavement and the excavation of soil during restoration. During this time, numerous cumulative projects identified on Table 4-1 would occur concurrently at the Port and surrounding areas.

Because all archaeological resources are unique and nonrenewable resources, projects that demolish or alter certain archaeological resources have the potential to erode a general cultural landscape to which the archaeological resources belong. Therefore, implementation of the Proposed Project could result in a cumulatively significant effect on unknown archaeological resources when combined with other cumulative development in the area due to the loss of identified or unknown archaeological resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a resource would be materially impaired. However, all the cumulative projects identified in Table 4-1 are required to adhere to compliance with CEQA regulations and to implement mitigation measures when significant impacts are identified. This will ensure that cumulative impacts to unknown archaeological resources would be less than significant with adherence to existing regulatory requirements.

Contribution of the Proposed Project

As discussed in Section 3.2.6, there are no known significant archaeological resources pursuant to CEQA Guidelines Section 15064.5 present on the Proposed Project site, and similar to the cumulative projects listed in Table 4-1, the Proposed Project would be required to adhere to compliance with CEQA regulations, standard conditions of approval as well as existing Port construction specifications that ensure that impacts to unknown archaeological resources would not create any new significant impacts or substantially more severe impacts. As such, the Proposed Project would not result in a cumulatively considerable impact to archaeological resources.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. All construction projects would have to adhere to applicable CEQA regulations and regulatory requirements for the inadvertent discovery of archaeological resources. Thus, there would be no cumulatively considerable impacts to archaeological resources.

4.2.2.3 Cumulative Impact CR-3: Would the Proposed Project result in a cumulative impact to paleontological resources or unique geological features?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Because all paleontological resources are unique and nonrenewable resources, projects that alter certain resources have the potential to erode the fossil record or geological setting to which the paleontological resources belong. Therefore, implementation of the Proposed Project could result in a cumulatively significant effect on paleontological resources when combined other cumulative development in the area if identified or unknown unique paleontological resources are destroyed, lost or materially impaired during project excavation or construction.

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. There are 42 projects identified for cumulative analysis as shown in Table 4-1 and illustrated in Figure 4-1. The closest cumulative project to the Project site is approximately less than 0.25 miles south of the Proposed Project site (see Table 4-1 and Figure 4-1).

Phase 1 of the Proposed Project would involve up to 10 years of continued operations, and would be followed by Phase 2, which would consist of a non-operational restoration period lasting up to 5 years and would involve the demolition of onsite structures, the removal of all pavement and the excavation of all soil during restoration. During this time, numerous cumulative projects identified on Table 4-1 would occur concurrently at the Port and surrounding areas. Ongoing development and growth in the broader Project area may result in a cumulatively significant impact to paleontological resources due to the continuing disturbance of undeveloped areas, which could potentially contain significant paleontological resources. These projects would be required to comply with all federal, state, and local requirements and regulations related to paleontological resources, and to implement all feasible mitigation measures should a significant project-related and/or cumulative impact be identified. As such, cumulative impacts would be less than significant with adherence to existing regulatory requirements.

Contribution of the Proposed Project

As discussed in Section 3.2.6, no prehistoric sites have been identified in the Proposed Project site or within a 0.25-mile radius of the site. Furthermore, the geologic formation within the Project site is man-made artificial fill created in the 20th Century. The location is on Terminal Island, which has been

subject to extensive previous construction activity. This activity has likely destroyed any unique paleontological resources and any unique geologic features. The Proposed Project excavation would not occur on any geologic layer that could yield unique paleontological resources. Therefore, there would be no cumulatively considerable impact to unique paleontological resources or unique geologic features caused by the Proposed Project.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. All construction projects would have to adhere to applicable regulatory requirements for paleontological resources. Thus, there would be no cumulatively considerable impacts to paleontological resources or unique geological features.

4.2.2.4 Cumulative Impact CR-4: Would the Proposed Project cause a cumulatively considerable contribution in the disturbance of any human remains, including those interred outside of formal cemeteries?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Because human remains are unique and nonrenewable resources, projects that demolish, destroy, alter or move human remains have the potential to erode a general cultural landscape to which the human remains belong.

The geographic scope of the cumulative cultural resources analysis is the region surrounding the Proposed Project site. There are 42 projects identified for cumulative analysis as shown in Table 4-1 and illustrated in Figure 4-1. The closest cumulative project to the Proposed Project site is approximately less than 0.25 miles south of the Proposed Project site (see Table 4-1 and Figure 4-1).

Phase 1 of the Proposed Project would involve up to 10 years of continued operations, and would be followed by Phase 2, which would consist of a restoration period lasting up to 5 years and would involve the demolition of onsite structures, the removal of all pavement and the excavation of soil during restoration. During this time, numerous cumulative projects identified on Table 4-1 would occur concurrently at the Port and surrounding areas. Therefore, development within the area would have the potential to result in a cumulative impact associated with the loss of yet unidentified human remains through the physical demolition, destruction, relocation, or alteration of human remains or their immediate surroundings. However, In the event that human remains are inadvertently encountered during the ground disturbing activities of cumulative projects, they would be treated consistent with state and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5. Compliance with these regulations would ensure that impacts to human remains. Compliance with these laws and regulations would ensure that impacts to unknown human remains resulting from the cumulative projects would be less than significant.

Contribution of the Proposed Project

As discussed in Section 3.2.6, no prehistoric or historic period burials, within or outside of formal cemeteries, were identified within the Proposed Project site as a result of the California Historical Resources Information System records search. In the event that human remains are inadvertently encountered during ground disturbing activities, they would be treated consistent with state and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e) similar to the cumulative projects. Compliance with these laws and regulations would ensure that impacts to human

remains resulting from the Proposed Project would not cause any new significant impacts. Based on the degree of protection afforded by the aforementioned state regulations and standard conditions as required by the Port, the Proposed Project would not cause a cumulatively considerable contribution in the disturbance of any human remains, including those interred outside of dedicated cemeteries.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. All construction projects would have to adhere to applicable regulatory requirements for the inadvertent discovery of human remains. Thus, there would be no cumulative considerable impacts to human remains.

4.2.3 GREENHOUSE GAS EMISSIONS

4.2.3.1 Scope of Analysis

Scientific evidence indicates a trend of warming global surface temperatures over the past century due largely to the generation of greenhouse gas (GHG) emissions from anthropogenic sources, as further discussed in Section 3.3, Greenhouse Gas Emissions. GHG emissions contribute to global climate change and are in part attributed to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors.

The region of analysis for cumulative GHG effects (GHG-1) is the California state boundary. The region of analysis for the Proposed Project's consistency with relevant plans, policies, and regulations (GHG-2) is also the California state boundary.

4.2.3.2 Methodology and Baseline for Cumulative GHG Impacts

The CEQA Baseline is discussed in detail in Section 2.4.7 of Chapter 2, Project Description. In summary, the CEQA Baseline for the Proposed Project is existing operation in Fiscal Year 2021/2022. The methodology used to quantify GHG emissions associated with the CEQA Baseline and the Proposed Project is discussed in detail in Section 3.3.4. The threshold of significance is defined in Section 3.3.5.

The challenge in assessing the significance of an individual project's contribution to global GHG emissions and associated global climate change impacts is to determine whether a project's GHG emissions, which are at a micro-scale relative to global emissions, make a cumulatively considerable incremental contribution to a macro-scale impact. SCAQMD developed a project-level significance threshold for GHGs. For the purposes of this cumulative discussion, it is conservatively assumed that an exceedance of the project-level threshold would result in a cumulatively considerable contribution to the overall GHG burden.

4.2.3.3 Cumulative Impact GHG-1: Would the Proposed Project result in GHG emissions that would make a cumulatively considerable contribution?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past, present, and reasonably foreseeable future projects in the area (Table 4-1) have generated and will continue to generate GHGs from the combustion of fossil fuels and the use of coatings, solvents, refrigerants, and other products. Current and future projects will incorporate a variety of GHG reduction measures in response to federal, state, and local mandates and initiatives, and these measures are expected to reduce GHG emissions from future projects. However, because of the long-lived nature of

GHGs in the atmosphere and the global nature of GHG emissions impacts, no specific quantitative thresholds of significance under CEQA for GHG emissions from related projects in the region or state-wide have been identified. It is therefore conservatively assumed that GHG emissions related to past, present, and reasonably foreseeable future projects represent a significant cumulative impact.

Contribution of the Proposed Project

GHG emissions associated with Phase 1 and Phase 2 of the Proposed Project are presented in Table 3.3-2. The table shows that GHG emissions would be below the CEQA Baseline and as such would not exceed the SCAQMD threshold of significance. As such, the Proposed Project would not create a new significant cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. Proposed Project GHG emissions would be less than the CEQA Baseline and would therefore not make a cumulatively considerable contribution to an existing cumulatively significant impact.

4.2.3.4 Cumulative Impact GHG-2: Would the Proposed Project result in a cumulatively considerable contribution to conflicting with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past, present, and reasonably foreseeable future projects in the area (Table 4-1) have generated and will continue to generate GHGs from the combustion of fossil fuels and the use of coatings, solvents, refrigerants, and other products. Current and future projects will incorporate a variety of GHG reduction measures in response to federal, state, and local mandates and initiatives, and these measures are expected to reduce GHG emissions from future projects. It is therefore conservatively assumed that GHG emissions related to past, present, and reasonably foreseeable future projects represent a significant cumulative impact.

Contribution of the Proposed Project

The Proposed Project's consistency with key relevant GHG reduction strategies is presented in Table 3.3-3. The table shows that the implementation of the Proposed Project would not conflict with any of the applicable state and local GHG reducing plans, policies and regulations adopted with the purpose of reducing GHG emissions. As such, the Proposed Project would not create a new significant cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are needed. The Proposed Project would not conflict with any key relevant state and local GHG reducing plans, policies and regulations, and would therefore not make a cumulatively considerable contribution to conflicting with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions.

4.2.4 HAZARDS AND HAZARDOUS MATERIALS

4.2.4.1 *Scope of Analysis*

The geographic scope for cumulative impacts associated with accidental spills or hazardous materials encompasses the overall Port Complex and Precautionary Area. Past, present, and reasonably foreseeable future projects that could contribute to these cumulative impacts includes those projects that transport hazardous materials in the vicinity of the Port Complex.

The significance criteria for the cumulative analysis are the same as those used for the Proposed Project in Section 3.4, Hazards.

4.2.4.2 *Methodology and Baseline for Cumulative Hazardous Impacts*

Potential impacts related to hazards and hazardous materials generally relate to the handling, storage, transportation, and potential releases of hazardous materials or petroleum products. In addition, and as is the case with the Proposed Project site, there is the potential for releases of hazardous materials or exposure of humans or the environment to hazardous materials due to the presence of contamination in soil, groundwater, and/or soil vapor on the Project site. In the case of the Project site, or any contaminated site, construction on the site has the potential to release contaminated media, thereby exposing the public or environment, and ongoing occupation has the potential to expose on-site occupants to contaminated media. These effects are typically localized, and when known, are often under the regulatory oversight of a federal, state, or local environmental agency (e.g., U.S. EPA, Department of Toxic Substances Control (DTSC), State Water Resources Control Board).

For the purposes of this evaluation, it can be assumed impacts associated with the Proposed Project would be similar to those on other similar projects in the Port Complex. It is assumed this will consider a worst case scenario for potential impacts.

4.2.4.3 *Cumulative Impact HAZ-1: Would the Proposed Project make a cumulatively considerable contribution due to hazards through the routine transport, use or disposal of hazardous materials?*

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

If concurrent cumulative projects identified in Table 4-1 resulted in off-site migration of hazardous material constituents, this could result in a cumulatively significant impact. However, the Proposed Project's metal recycling operations are unique to the Port Complex, and as such it can be assumed that the potential impacts related to routine transport, use, or disposal of hazardous materials are also unique.

Typically, industrial operations, such as those in the Port Complex, are regulated under federal, state, and local rules and regulations (Section 3.4.3). These regulations are in place to eliminate significant impacts associated with routine operations. It can generally be assumed that cumulative projects and ongoing industrial operations within the Port Complex would adhere to federal, state, and local rules and regulations, and those that do not would be under regulatory oversight for cleanup actions.

Considering the unique operations of the Proposed Project compared with the cumulative projects listed in Table 4-1, and the unique releases resulting in a Consent Order issued by DTSC, it can be assumed that potentially significant impacts are unique to the Project site. As such, cumulative projects are not likely to result in a cumulatively significant impact.

Contribution of the Proposed Project

As discussed in Section 3.4.6.1, the Proposed Project will not result in new or substantially more severe impacts with the implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2. In addition, the operations of the Proposed Project are unique, and impacts, while less than significant, are unique to the Proposed Project. As a result, operation of the Proposed Project would not result in a cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation is required. As discussed in Section 3.4.6.1, the Proposed Project will implement Project-specific mitigation measures (MM-HAZ-1 and MM-HAZ-2) that will ensure all new potential significant impacts will be kept at a less than significant level. In addition, the legally enforceable Consent Order is in place, and actions to address hazardous material releases have been implemented and will continue to be required. While the Proposed Project and nearby cumulative projects will likely involve the routine use of hazardous materials, rules, regulations, and best management practices (BMPs) and protocols are in place for all hazardous materials handling, especially for substances handled above reportable quantities. As a result, routine use, transportation, and storage of hazardous materials during operation of the Proposed Project would not result in a new significant cumulative impact.

4.2.4.4 Cumulative Impact HAZ-2: Would the Proposed Project make a cumulatively considerable contribution to hazards caused to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

As discussed above, concurrent cumulative projects within the Port Complex are not likely to have similar impacts, as proposed operations are not similar. Cumulative projects do have the potential to release hazardous materials to the environment due to accident or upset conditions. Regulations in place that manage the handling of these hazardous materials require written and practicable release prevention and response procedures if reportable quantities of hazardous materials are used on site. Should contaminated media be present, similar to the Proposed Project site, where construction would disturb and potentially release hazardous materials, contaminated media BMPs/protocols will mitigate such releases. These mitigation measures, similar to those proposed for the Proposed Project (see MM-HAZ-1 and MM-HAZ-2 in Section 3.6.4.2), would reduce potentially cumulative impacts to less than significant levels.

Contribution of the Proposed Project

As discussed in Section 3.6.4.2 with the implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2, the Proposed Project would not result in a new foreseeable upset condition associated with the release of hazardous materials and would not result in a cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation is required. As discussed in Section 3.6.4.2, the Project will implement project-specific mitigation measures (MM-HAZ-1 and MM-HAZ-2) that will ensure the Proposed Project would not result

in any new foreseeable upset condition associated with the release of hazardous materials. In addition, a legally enforceable Consent Order is in place, and actions to address alleged off-site migration of hazardous materials has occurred and will continue to be required. As such, on- and off-site releases of hazardous materials have and will continue to be remediated under the Consent Order. Therefore, operation of the Proposed Project would not result in a new cumulatively considerable impact.

4.2.4.5 Cumulative Impact HAZ-3: Would the Proposed Project cumulatively contribute to sites that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Some of the cumulative projects identified in Table 4-1 may also be included on government cleanup databases, and as such would be under regulatory oversight for cleanup of released hazardous materials to the environment. As with the Project site, their presence on this list does not necessarily result in a significant impact, as ongoing remediation as required by these regulatory agencies would ultimately reduce impacts to the environment (i.e., remove hazardous materials from soil, soil vapor, and groundwater during remediation activities). Construction and operation of cumulative projects that are identified on Cortese List databases would not likely result in a cumulative significant impact.

Contribution of the Proposed Project

As discussed in Section 3.4.6.3, the Proposed Project would result in a reduction of impacts associated with groundwater contamination resulting from the leaking underground storage tank release, which is regulated under Los Angeles Regional Water Quality Control Board (LARWQCB) File 90-47. This ongoing remediation would reduce impacts associated with the groundwater contamination plume, and the Proposed Project would not contribute to a significant cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are required, because cleanup and remediation is inherently required for contaminated sites that under regulatory oversight. There would be no cumulatively considerable impacts.

4.2.5 HYDROLOGY AND WATER QUALITY

4.2.5.1 Scope of Analysis

The region of analysis for cumulative effects on hydrology and water quality is the Los Angeles and Long Beach Harbor (Fish Harbor, Inner Harbor, and Outer Harbor areas) as these waters represent the receiving waters of the cumulative projects. As described in Section 3.5.5, the only Port of Los Angeles CEQA significance thresholds that were included in the analysis was HYD-1 (related to violation of water quality standards or waste discharge requirements) and HYD-2 (risk release of pollutants due to inundation from a flood, tsunami, or seiche wave hazard) because the IS/NOP identified no impacts related to changes in drainage patterns that would result in flooding or would exceed planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

As described in Section 3.5.6.4, the Proposed Project does not include any mitigation measures as the impact analysis for both impact criterion determined that the Proposed Project would not substantially increase the frequency or severity of adverse effects related to hydrology or water quality for continued operations nor nonoperational restoration activities.

4.2.5.2 Methodology and Baseline for Cumulative Hydrology and Water Quality Impacts

The methodology used for the cumulative analysis of hydrology water quality impacts considers the existing regulatory framework for the cumulative projects as well as the existing Project's characteristics. As also used in Section 3.5, Hydrology and Water Quality, project characteristics consider that the Proposed Project would continue operations that are already occurring at the site and no physical improvements or material changes to existing operations would occur over the next 10 years. As a result, the baseline for the cumulative analysis includes the existing site operations of the Proposed Project and other existing cumulative projects as identified in Table 4-1, as well as the existing conditions of the Los Angeles and Long Beach Harbors as presented in Section 3.5.2.1.

Potential cumulative impacts associated with the Phase 2 Nonoperational Restoration phase of the Project assume that similar to the Proposed Project analysis, following demolition of on-site structures, the site would be remediated through excavation and off-site disposal of contaminated soils consistent with oversight by the LARWQCB.

4.2.5.3 Cumulative Impact HYD-1: Would the Proposed Project make a cumulatively considerable contribution due to a violation of water quality standards or waste discharge requirements or the degradation of surface or groundwater quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The waters in the Los Angeles and Long Beach Harbors are listed as impaired according to the Clean Water Act and the 303(d) list of impaired waters. The 303(d) list includes the Los Angeles Harbor (Consolidated Slip) as impaired by nickel and Polycyclic Aromatic Hydrocarbons (PAHs), the Inner Harbor impaired by PAHs, and the Outer Harbor (inside the breakwater) also impaired by PAHs.

In 2012, the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants total maximum daily load (TMDL or Harbor Toxics TMDL) was announced by the EPA and the State. This TMDL includes all of the listed water body impairments within the area, all of which are in the sediment, not in the water column. The TMDL essentially consists of an action plan to ultimately restore water quality.

The Harbor Toxics TMDL designates a group of responsible parties including the City of Los Angeles, the City of Long Beach, their respective ports, and several smaller cities upstream of the Harbor area. The responsible parties for the greater harbor waters have formed a regional monitoring coalition to cover the required monitoring aspects of the TMDL. Other aspects of the required monitoring that take place at shorter intervals include water sampling for the list of TMDL-related chemicals, and fish tissue sampling.

The ports of Los Angeles and Long Beach, in coordination with the State of California Los Angeles Regional Water Quality Control Board, designed and performed a comprehensive series of special studies in order to establish a site-specific sediment quality objective for human health (fish tissue) in the harbor. The group, known as the Harbor Technical Working Group, also examined issues related to Harbor Toxics TMDL compliance and oversaw the completion of the harbor hydrodynamic, sediment transport, chemical fate, and bioaccumulation model (linked WRAP model).

Cumulative projects with in-water construction components (e.g., dredging, dike placement, fill, pile driving, and pier maintenance) would result in temporary and localized adverse effects to water quality when

existing contaminated sediments are disturbed. However, these adverse effects are often minimized with implementation of construction methods that minimize disturbances and would generally be localized and temporary. Other sources of pollution include discharges and stormwater runoff or wastewater discharges from the cumulative sites. However, these discharges are currently regulated by the National Pollutant Discharge Elimination System (NPDES) Program and stormwater permits where projects are required to prepare and implement storm water pollution prevention plans (SWPPPs). SWPPPs provide the BMPs and monitoring compliance measures that are designed to minimize the off-site discharge of pollutants. Although existing regulatory compliance measures would apply to existing and future projects, the Harbor is still listed as impaired and included on the Section 303(d) list. Until the TMDL can be fully implemented throughout the entire watershed, the related projects would be cumulatively considerable and result in a cumulatively significant impact to water quality.

Contribution of the Proposed Project

The Proposed Project does not include any in-water construction activities and as a result would not disturb any existing contaminated sediments within the Harbor waters. The Proposed Project only extends current operations at the site and there would be no material changes to the operations such that there would be a negligible change in stormwater discharges from the site. The existing facility has both a SWPPP and Spill Prevention Plan to address any accidental spills of hazardous materials at the site such that containment and spill response measures can be employed to minimize any adverse effects in the unlikely event of a spill or accidental release. As a result, the Proposed Project would not make a cumulatively considerable contribution to adverse effects to water quality during Phase 1 - Continued Operations.

The SWPPP and Spill Prevention Plan would also be implemented during Phase 2 - Nonoperational Restoration activities at the site. The SWPPP would include BMPs to ensure that all demolition activities and site cleanup activities are conducted in a manner that minimizes off-site discharge of pollutants by providing containment methods that have proven effective in reducing adverse effects to insubstantial levels. As a result, the Nonoperational Restoration phase of the Project would not have a cumulatively considerable impact on the Harbor waters.

Mitigation Measures and Residual Cumulative Impacts

With adherence to existing regulatory requirements, the Proposed Project would not have any cumulatively considerable impacts on water quality as a result of runoff and no mitigation measures would be required.

4.2.5.4 Cumulative Impact HYD-2: Would the Proposed Project make a cumulatively considerable contribution due to the risk release of pollutants due to inundation as a result of a flood, tsunami or seiche hazard?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

As noted above, the Los Angeles and Long Beach Harbor waters are impaired and included on the 303(d) list in accordance with the Clean Water Act. Any release of additional pollutants could exacerbate the water quality of the Harbor waters. The majority of the cumulative projects include industrial land uses that involve varying types and quantities of hazardous materials and are located in varying risk levels of inundation by flood or tsunami hazards. Seiche waves are generally related to enclosed bodies of water (e.g., lakes) or semi-enclosed bodies of water, which could include the Inner Harbor area. However, the inundation from a tsunami event is considered to be a higher risk than

seiche waves. In the event of a substantive flood, tsunami or seiche hazard, unsecured or exposed hazardous materials could be at risk of release and result in a cumulatively considerable discharge of pollutants into the Harbor waters.

Contribution of the Proposed Project

The Proposed Project site is not located in a 100-year flood zone, but is located in a tsunami hazard zone. As discussed in Section 3.5.6.2, a flood hazard model was developed for the Port and found that the most likely sources for tsunamis, large offshore earthquakes (M-7.5) in the Port region, are very infrequent and would have a low probability of occurring during the Proposed Project's Phase 1, which is limited to 10 years. In addition, the contaminant sources that would exist at the Project site would be no different than what is already subject to inundation under existing conditions and are subject to existing storage requirements in accordance with regulatory requirements. Phase 2 of the Proposed Project would be an even shorter time frame of just 5 years and therefore would also have a low probability of inundation during that phase of the Project. In addition, Phase 2 operations would not include any substantive increases in the types, quantities or storage methods of hazardous materials at the site while any hazardous materials associated with operations (e.g., fuels, oils, paints, solvents associated with maintenance) would be removed. All remediation activities including the removal of contaminated soils would be conducted under the oversight of the appropriate regulatory agencies. Thus, there would not be any increase in risks of potential pollutants at the Project site. Therefore, contribution of the Proposed Project would not make a cumulatively considerable impact related to risk of release of pollutants from inundation when combined with past, present, and future projects.

Mitigation Measures and Residual Cumulative Impacts

The contribution of the Proposed Project would be less than cumulatively considerable. Therefore, no mitigation measures would be required.

4.3 Mitigation Monitoring

No mitigation is required.

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