Chapter 1
Introduction

1.1 Purpose of the SEIR

The Los Angeles Harbor Department (LAHD), an agency of the City of Los Angeles, also referred to as the Port of Los Angeles (Port), prepared this Draft Supplemental Environmental Impact Report (SEIR) to supplement and update the Berths 97-109 [China Shipping] Container Terminal Project Environmental Impact Statement/Environmental Impact Report (EIS/EIR) certified by the City of Los Angeles Board of Harbor Commissioners on December 18, 2008 (LAHD and USACE, 2008). The 2008 EIS/EIR evaluated the environmental impacts of the construction and operation of the China Shipping (CS) Container Terminal at Berths 97-109. This Draft SEIR evaluates the continued operation of the CS Container Terminal under new and/or modified mitigation measures. These changes to mitigation measures are collectively referred to as the "Revised Project." The term "Revised Project" is used throughout this document to encompass the broadest set of modifications to the project components and mitigations that were analyzed and approved in the previously certified Environmental Impact Report (EIR; the "Approved Project"), the details of which are described in Section 2.5 of this document.

LAHD is the public agency with the principal responsibility for approving the Revised Project, and as such is the Lead Agency under CEQA pursuant to CEQA Guidelines Section 15367. CEQA requires the Lead Agency to consider the information contained in the SEIR prior to approving modifications to the CS Container Terminal. Section 15163 of the CEQA Guidelines states that a lead agency may choose to prepare a "supplement" to an EIR when "only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation." The Revised Project would require that a permit amendment be agreed to with the permittee and approval from the Los Angeles Board of Harbor Commissioners (Harbor Commission) and the Los Angeles City Council. Prior to the issuance of any permit amendments or other project approvals, the Harbor Commission must consider the Revised Project's environmental effects. Those impacts are identified in two documents: an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) prepared by US Army Corps of Engineers (USACE) and the Los Angeles Harbor Department (LAHD) to examine the impacts of construction and operation of the terminal (USACE and LAHD, 2008), and this Draft SEIR.

USACE was the federal lead agency for the Approved Project under National Environmental Policy Act (NEPA) (U.S. Code [USC Title 42, Section 4341 et seq.) and

in conformance with the Council for Environmental Quality (CEQ) Guidelines and the USACE NEPA Implementing Regulations (Code of Federal Regulations [CFR], Title 33, Parts 230 and 325). However, because the Revised Project does not include any elements requiring federal action, including approvals, a NEPA document is not required and is not being prepared.

A Supplemental EIR, as its name implies, supplements an EIR that has already been certified for a project, to address project changes, changed circumstances, or new information that was not known, and could not have been known with the exercise of reasonable diligence at the time the prior document was certified. The purpose of a Supplemental EIR is to provide the additional information necessary to make the previously certified EIR adequate for the project as revised. Accordingly, the Supplemental EIR need only contain the information necessary to respond to the project changes, changed circumstances or new information that triggered the need for additional environmental review (CEQA Guidelines, Section 15163.) A Supplemental EIR 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.

The Revised Project makes minor changes to the continued operation of the CS Container Terminal by modifying 10 mitigation measures and one lease measure that were originally adopted based on the 2008 EIS/EIR. This Draft SEIR analyzes the impacts of these modifications to those mitigation measures, in light of conclusions of the certified 2008 EIS/EIR for the CS Container Terminal.

The changes proposed as part of the Revised Project requires discretionary approval of the Board of Harbor Commissioners. CEQA requires a lead agency, on the occasion of a subsequent discretionary approval that follows completion of an EIR for a project, to inquire whether substantial evidence indicates that "new significant environmental effects or a substantial increase in the severity of previously identified significant effects" would result from either changed circumstances surrounding the project, or new information of substantial importance to the project that was not and could not have been known at the time of certification of the initial EIR (Guidelines Section 15162; see also Pub. Res. Code Section 21166.) If the agency determines that substantial evidence supports such a conclusion, the agency must conduct subsequent or supplemental environmental review.

The LAHD, in the course of preparing the Draft SEIR, has reassessed the capacity of the China Shipping Container Terminal and determined that the physical capacity of the terminal is greater than the assumptions used in the 2008 EIS/EIR. These changes are "changed circumstances" or "new information" that require analysis in an SEIR. Accordingly, this Draft SEIR, in evaluating the impacts of operation of the CS Container Terminal under the Revised Project, assumes and analyzes impacts of an incremental increase in the terminal's throughput in future years, based upon re-assessment of terminal capacity, compared to the assumptions in the 2008 EIS/EIR.

The Draft SEIR incorporates by reference information and analysis contained in the 2008 EIS/EIR. The 2008 EIS/EIR is used in this Draft SEIR as a comparison against which the Revised Project is evaluated. A full description of the baseline is presented in Section 2.6.

Whether project changes will result in a new or substantially more severe significant impact is often not known until the supplemental analysis is completed. Therefore, the fact that a SEIR is being prepared does not necessarily imply a conclusion that the

changed project components will result in new or more severe significant impacts. The analysis for this SEIR was conducted and is presented here for purposes of full disclosure where the changes to the mitigation measures appeared to have the potential to create new or more severe impacts.

1.2 Project Background

1.2.1 The Port of Los Angeles

The Port of Los Angeles (POLA) is the leading seaport in North America in terms of shipping container volume and cargo value, generating more than 830,000 regional jobs (this equates to 1 in 9 jobs in the five county area) and $35 billion in annual wages and tax revenues. Operating for more than a century, POLA has been a center for global trade, national cargo transportation and related industrial uses. Together with the Port of Long Beach, it handles up to 64% of all shipping on the West Coast, and about 35% of all shipping in the United States. In Fiscal Year (FY) 2014-2015, POLA handled more than 8.1 million TEUs (twenty-foot equivalent units, a standardized maritime industry measurement used when counting cargo containers of varying lengths) of cargo through its terminals.

LAHD operates the Port under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Section 601) and the California Coastal Act (PRC Division 20, Section 30700 et seq.), which identify the Port and its facilities as a primary economic and coastal resource of the State of California and an essential element of the national maritime industry for the promotion of commerce, navigation, fisheries, and harbor operations. Activities should be water dependent, and LAHD must give highest priority to navigation, shipping, and necessary support and access facilities to accommodate the demands of foreign and domestic waterborne commerce. LAHD is chartered to develop and operate the Port to benefit maritime uses. It functions as a landlord by leasing Port properties to more than 300 tenants.

The United States and China are the two largest trading countries in the world, and the two countries exchange significant amounts of cargo annually. POLA, as the nation's leading seaport, is a critical hub for facilitating trade from Asia, and China in particular.

1.2.2 Overview of the CS Container Terminal

The CS Container Terminal is operated by the West Basin Container Terminal Company under a lease agreement (Permit No. 999) originally entered between China Shipping (North America) Holding Co., Ltd. ("China Shipping") and LAHD. The premises assigned to China Shipping are located at 2050 John S. Gibson Boulevard, within an industrial area in the vicinity of the West Basin and Turning Basin in Los Angeles Harbor (Figure 1-1). The terminal occupies approximately 142 acres at Berths 97-109 under LAHD Permit No. 999. The site is near the communities of San Pedro and Wilmington, approximately 20 miles south of downtown Los Angeles. The site is generally bounded on the north by the Yang Ming container terminal; on the east by the West Basin and the Main Channel; on the south by the passenger cruise terminal and State Route 47; and on

the west by the I-110 Freeway and the community of San Pedro. Land uses in the vicinity support a variety of cargo handling operations, including container, liquid bulk, and dry bulk; commercial fishing and seafood processing; a power plant (Harbor Generating Station); Port administration and maintenance facilities; maritime support uses; and recreational and residential uses.

The CS Container Terminal integrates several different physical components and operational processes to load and unload oceangoing vessels and to move the cargo through the terminal to and from trucks and trains as cost-effectively as possible. The physical components consist of marine container vessels, berths/wharves (docks), cranes, backland storage areas (container yard), entrance and exit gates, rail facilities (usually), and maintenance and administrative buildings. The operational processes include shipping, stevedoring (loading/unloading ships), container storage and management, in-terminal drayage (hauling), on-dock rail operations, and trucking to offsite locations such as warehouses and rail yards.

The CS Container Terminal was constructed in several phases between 2004 and 2013, and began operation in 2005. It consists of two berths, ten wharf cranes for ship loading, and a container yard and gate complex. The terminal has access to an on-dock intermodal railyard at the adjacent Yang Ming Terminal (for a fuller description of the existing terminal see Section 2.5.1 and USACE and LAHD [2008]). The Revised Project does not include any physical alterations to the existing terminal, but instead consists of altered operating conditions from those examined in the 2008 EIS/EIR (USACE and LAHD, 2008). The Revised Project will operate over a period of approximately 27 years, from 2018 to 2045, the remaining term under LAHD Permit No. 999.

The CS Terminal includes two berths and a container yard, and it uses the on-dock West Basin Intermodal Container Transfer Facility (WBICTF) that is on the premises of the adjacent Yang Ming terminal at Berths 121-131. Inbound containers that are to be delivered by rail are hauled from the vessel berths to the WBICTF by yard tractors via bridges connecting the two terminals. Similarly, outbound containers arriving by rail are unloaded at WBICTF and transferred to the backlands at the CS Container Terminal. Cargo not transferred by on-dock rail is hauled by trucks to local destinations and other rail facilities. The CS Container Terminal and Yang Ming Container Terminal share one gate complex.

1.2.3 Project History

1.2.3.1 West Basin Transportation Improvements Program EIR

The CS Container Terminal project was developed on vacant land previously used by Chevron USA and Todd Shipyard. Prior to 2001, the adjacent Yang Ming Lines Container Terminal was permitted to use a portion of the undeveloped project site as overflow container backlands. The Port previously prepared and certified the West Basin Transportation Improvements Program (WBTIP) EIR that assessed the proposed construction and operation of terminal and infrastructure improvements in the West Basin of the Port (LAHD, 1997). The document programmatically analyzed the impacts of the development of three separate container terminals in the West Basin: the CS Terminal, the Yang Ming Terminal, and the TraPac Terminal.

In March 2001, based on the WBTIP EIR, the Port issued a permit to construct a three-phased container terminal and entered into a lease for China Shipping to occupy the terminal. The lease (Permit No. 999) granted China Shipping nonexclusive use of 72.48 acres at Berths 100-102 for operation of a container terminal facility for a term of twenty-five years with three five-year options to extend, exercisable by China Shipping. LAHD would develop and construct the terminal, designed to optimize operations at Berths 97-109, for its tenant, China Shipping. As part of the lease, West Basin Container Terminal LLC (WBCT), a subsidiary of China Shipping, operates the terminal backlands. The lease requires that the premises be used for activities, operations, and purposes incidental to and related to the operation of a container terminal, and prohibits any other use of the premises without prior approval of the Port. In October 2001, the Port granted a coastal development permit to begin construction of Phase I of the CS Terminal Project.

Figure 1-1: The Berths 97-109 (China Shipping) Container Terminal

1.2.3.2 Legal Challenge and Amended Stipulated Judgment (ASJ)

In June 2001, opponents of the project filed suit in Los Angeles Superior Court alleging, among other things, that LAHD did not comply with CEQA in approving the construction of the CS Terminal Project. The lawsuit sought an order setting aside Permit No. 999 and the coastal development permit. China Shipping was served with all

papers and pleadings in the lawsuit as the real party in interest, but did not make any appearance in the lawsuit. On October 30, 2002, the State of California Second District Court of Appeals ordered a partial halt to ongoing construction and operation, and ordered the preparation of a project-specific EIR to evaluate the entire CS Container Terminal project, including elements that had been built and were in operation. Under the Court's order, construction of Phase I was permitted to continue and was completed in 2003. Operations officially began on June 21, 2004.

LAHD settled the lawsuit in 2004. Under the terms of the Amended Stipulated Judgment (ASJ) entered into with the project opponents, LAHD committed to preparing a new project-specific EIR, agreed to several mitigation measures and established a $50 million fund to address impacts of Port operations on the community. Although the CS Container Terminal and Yang Ming Container Terminal share one gate complex, the ASJ required the preparation of a project-specific environmental analysis of all three phases of the CS Container Terminal project alone, not as part of any larger West Basin project or other project. China Shipping was not a signatory to the ASJ, but was a party to Exhibit B to the ASJ, which required the use of alternative maritime power and low profile cranes at the CS Terminal.

Within the terms of the ASJ, China Shipping operated the terminal under the existing lease (Permit No. 999) signed in 2001. Consistent with the ASJ, the existing lease was to be amended after certification of the new project-specific EIR to require compliance with all laws and regulations, including environmental controls that are not part of the current lease.

Although China Shipping chose not to participate in the lawsuit or the ASJ, China Shipping filed a claim with LAHD, alleging damages from the delay caused by the litigation. LAHD and China Shipping entered into a settlement of these claims, which was memorialized in a lease amendment in 2005. This amendment incorporated the ASJ measures, settled China Shipping's claims against LAHD, and committed to the delivery of Phase II and III of the CS Container Terminal project by dates certain. As part of this settlement, LAHD paid China Shipping $22.2 million. The funds were used in part to offset the increased operating costs associated with complying with the new environmental provisions in the ASJ.

In 2008, the Port certified the new EIR for the Project, and adopted additional mitigation measures beyond those set forth in the ASJ.

1.2.3.3 2008 EIS/EIR and Economic Downturn

The Los Angeles Board of Harbor Commissioners certified the Berths 97-109 [China Shipping] Container Terminal Project EIS/EIR for the construction and operation of the CS Container Terminal project in 2008 (LAHD and USACE, 2008). The 2008 EIS/EIR analyzed Phase I construction and its subsequent operation in addition to the remaining construction and operation associated with Phases II and III. Major elements of the Approved Project analyzed in the 2008 EIS/EIR included: construction of a new wharf at Berth 102 and lengthening the wharf at Berth 100; the addition of 10 wharf cranes for vessel loading and unloading; installation of shore power (AMP) facilities at both berths; the expansion and development of 142 acres of terminal backlands; the construction of container terminal buildings, gate facilities and accessory structures; the construction of two new bridges over the Southwest Slip to connect the Berth 97-109 Container Terminal

to the Berth 121-131 Marine Terminal; relocation of the Catalina Express Terminal; and the construction of road improvements in the vicinity. Construction of Phase II and III of the CS Container Terminal was largely completed by 2013 (two terminal buildings have yet to be constructed), and operations are ongoing.

In February 2009, the EIR was challenged as inadequate by the City of Riverside, which claimed that the EIR did not adequately identify, assess or mitigate for remote traffic impacts in the City of Riverside. That litigation concluded in August of 2011, when the Fourth Appellate District affirmed a trial court decision upholding the new EIR as adequate.

While the lawsuit was pending, the Port suffered one of the steepest declines ever in trade volumes. The economic recession, which led to a decrease in trade of more than 25 percent (Ravikumar, Shao, and Sposi, 2013) began in 2007 and continued well into 2009. The severity of the recession was due to the interconnected nature of global trade: eight of the U.S.' top ten trading partners were also in recession. The close trade linkages between those countries resulted in fewer goods being imported and exported (Ravikumar, Shao, and Sposi, 2013). The drop in trade negatively affected the Port's volumes and revenues: the Port handled almost 8.4 million TEUs (twenty-foot equivalent units) of loaded containers in 2007 but only 6.7 million TEUs in 2009.

1.2.3.4 Recent Economic Developments

In February 2016, the China Ocean Shipping Group Company, or COSCO, and China Shipping Group merged to create the Cosco Shipping Line. As a result of the restructuring, COSCO Pacific assumed the assets previously held by China Shipping at the CS Container Terminal, including China Shipping North America, which remains the Port's tenant at Berths 97-109.

The restructuring was in response to the continued worldwide downturn in shipping rates and excess shipping capacity. China's economic slowdown has hurt the prices of commodities and services, including freight rates, which has damaged the shipping companies' profitability. As a result, shipping lines continue to experience financial challenges, as evidenced by the recent bankruptcy of Hanjin Shipping and the news that Cosco Shipping posted a $1.44 billion loss for 2016 (Laksmi, 2016).

1.2.4 Background on Mitigation Measures

1.2.4.1 Negotiations with China Shipping

After certifying the 2008 EIS/EIR, LAHD adopted 60 mitigation measures to reduce significant construction and operational impacts of the Approved Project in the areas of aesthetics, air quality, biology, cultural resources, geology, ground water, noise, public services, and transportation. Eight of those measures (MM TRANS-7 through MM TRANS-14) actually pertained to an alternative that was not adopted, and were erroneously included in the Mitigation Monitoring and Reporting Plan (MMRP) for the Approved Project; accordingly, 52 mitigation measures actually applied to the Approved Project. Some of those 52 measures were developed in the course of preparation of the 2008 EIS/EIR; others were incorporated into the document from the ASJ. At the time of the 2008 EIS/EIR, many of these measures had never been attempted anywhere in the

world. LAHD believed, at that time, that these measures, although far-reaching, were realistic and could be accomplished by a terminal operator within a reasonable timeframe. China Shipping, at the time, did not submit any information or data to LAHD regarding the feasibility of any of the proposed mitigation measures, or otherwise actively participate in the review or comment process for the 2008 EIS/EIR.

LAHD implements mitigation measures on container terminal projects by including them in leases with its tenants. The ASJ allowed China Shipping to operate the CS Container Terminal under Permit No. 999. Under the terms of the ASJ, that lease was to be amended to include the new operational mitigation measures from the 2008 EIS/EIR. Thus, after the trial court upheld the 2008 EIS/EIR, LAHD engaged in a negotiation process with China Shipping to amend the lease to include these measures.

China Shipping took the position during these negotiations that it was not required to agree to an amended lease because China Shipping was not a party to the ASJ and did not participate in the 2008 EIS/EIR process. For the first time, during this negotiation process, China Shipping also informed LAHD that there were technological, economic, and operational challenges that made implementation of certain mitigation measures, under the terms and timeframes required, operationally or economically infeasible. These issues were not raised by China Shipping or any party during the administrative process for the 2008 EIS/EIR, and LAHD was not aware of them when it adopted the mitigation measures.

1.2.4.2 Feasibility Issues Raised by China Shipping

To reach an agreement on the amended lease, LAHD attempted to work with China Shipping to address these issues, including providing extensions of time to implement certain new measures. However, China Shipping informed LAHD that it continued to have technical, operational and practical problems with executing some requirements of the mitigation measures, preventing full implementation of these measures (LAHD, 2017a). Per the Port's request, China Shipping provided some information on these challenges, which is summarized below. Although China Shipping provided some information on these feasibility issues at the Port's request, China Shipping has not proposed any modifications to make these measures feasible nor provided alternative measures that could address the same environmental impacts.

Alternative Marine Power (AMP). Mitigation Measure AQ-9 imposed certain requirements on ships calling at the CS Container Terminal to use alternative marine power (AMP). MM AQ-9 required that after 1 January, 2011 100% of China Shipping vessels must use AMP while hoteling in the Port. In addition, all non-China Shipping ships retrofitted for AMP must use AMP while hoteling except when an AMP-capable berth is unavailable.

China Shipping informed LAHD that it could not meet the 2011 target date for 100% AMP. LAHD determined that the actual total Particulate Matter (PM) emissions from ocean-going vessels (OGV) in 2012 and 2013 would be below those analyzed in the EIR, primarily because of the lower actual terminal throughput due to the recession, the use of larger vessels, and implementation of California Air Resources Board's (CARB's) low-sulfur marine fuel regulation. Based on these findings, LAHD agreed to extend the 2011 deadline for 100% AMP to December 31, 2013, to provide China Shipping with additional time to fit its vessels with AMP capability.

China Shipping subsequently informed LAHD that it could not feasibly achieve 100% AMP under the terms of MM AQ-9. Several factors affect the ability of a container terminal to achieve the goal of having 100% of vessel calls use shore power. First, very few terminals service only the vessels of a single shipping line; most, including the CS Container terminal, have a core business of vessels belonging to one shipping company or those of a consortium ("alliance") of a few shipping companies, but also accept third-party business. Second, situations arise that prevent an AMP-capable vessel from utilizing AMP. Finally, a small percentage of the vessels that call at a given container terminal are operated by shipping lines that do not meet the CARB required minimum of 25 annual calls; those vessels tend not to be outfitted to connect to shore power.

Vessel Speed Reduction Program (VSRP). Mitigation Measure AQ-10 required that starting in 2009, 100% of oceangoing vessels calling at the CS Container Terminal comply with the Vessel Speed Reduction Program (VSRP) within a 40-nautical-mile (nm) radius of Point Fermin. The VSRP was initially (2005) established as a 20-nm-radius, but MM AQ-10 extended the radius to 40 nautical miles.

China Shipping informed LAHD, and LAHD confirmed, that it may not be feasible to achieve 100% VSRP for the 40-mile radius, under the terms of MM AQ-10. Non-compliance with the VSRP is typically the result of pressure on vessel schedules caused by weather, port delays, and mechanical problems that result in a vessel being behind schedule. Vessel schedules are tied to terminal costs for a variety of factors, including maintaining labor on standby and penalties for late cargo delivery. Schedule slippage can be made up by increasing vessel speed, and if a vessel is still behind schedule as it approaches Los Angeles Harbor, the vessel's master may elect to exceed the speed limit in some part of the VSRP control radius. China Shipping asserts it has no direct authority over every vessel master that enters and leaves the CS Container Terminal.

Yard Tractors. Mitigation Measure AQ-15 required that all yard equipment at the CS Container Terminal use alternative fuels, as implemented in two phases. For the first phase, AQ-15 imposed the ASJ requirement that the terminal employ exclusively liquefied petroleum gas (LPG)-fueled yard tractors from 2004 to 2014. As of 2012, all yard tractors operating at the CS Container Terminal were LPG-powered, and thus complied with this requirement.

For the second phase, MM AQ-15 required that, beginning January 2015, all yard tractors must have the cleanest available NO_x alternative fuel engine meeting Environmental Protection Agency (EPA) Tier 4 requirements for particulate matter (PM), 0.015 grams per horsepower-hour (gm/hp-hr). China Shipping informed LAHD that implementing this requirement is problematic because it would require replacing most, if not all, of the yard tractors purchased to comply with the first phase of the mitigation measure.

In general, all LPG tractors, regardless of model year, have a nominal PM emission factor of 0.08 gm/hp-hr and, thus, are considered EPA Tier 3. While it is likely that the actual PM emission rates for the newest 2011 LPG models may meet the PM emissions requirement of this measure, other units purchased earlier to comply with the ASJ target under the first phase would have to be replaced, even though they achieve similar emissions benefits and retain operational usefulness. Based on the cost of replacing all units older than model year 2011, China Shipping informed LAHD that it may not be economically feasible or practicable to replace all pre-2011 LPG units at the same time to meet the target dates of MM AQ-15 (LAHD, 2017a).

Other Cargo Handling Equipment. Mitigation Measure AQ-17 imposed certain requirements on other yard equipment at the CS Container Terminal. The ASJ required that by 2004, all toppicks and sidepicks be equipped with diesel oxidation catalysts (DOCs) and use emulsified diesel fuel. MM AQ-17 imposed further requirements, including that beginning in 2009, all rubber-tired gantry cranes (RTGs) must be electric powered and by the end of 2014, all cargo handling equipment must meet Tier 4 off-road or on-road engine standards.

China Shipping has since informed LAHD that it cannot meet the target dates of MM AQ-17 (LAHD, 2017a). There are currently only three toppicks at the CS Container Terminal that meet the Tier 4 standard in MM AQ-17. The operator, WBCT, would need to purchase another 15 units and dedicate them to the CS Container Terminal to comply with the measure. In addition, there is only one sidepick unit at the CS Container Terminal that meets Tier 4 standards under the measure. Accordingly, compliance with the measure would require replacing eight other units with Tier 4-compliant units and dedicating the new units to the CS Container Terminal. This would entail replacing units that still have operational usefulness.

The measure also requires the use of electrified RTGs. The terminal configuration does not allow for these specific cranes to be used. Based on this, China Shipping informed LAHD that it may not be economically or operationally feasible to operate all electric RTGs and replace all LPG units at the same time to meet the target dates of MM AQ-17.

Drayage Trucks. The 2008 EIS/EIR adopted MM AQ-20 to reduce the emissions of drayage trucks arriving at and departing from the CS Container Terminal. The measure required that liquefied natural gas (LNG)-powered drayage trucks be used to convey containers to and from the terminal. The requirement has three phases: from 2012 through 2014, at least 50% of drayage trucks calling at the terminal must be LNG-powered, from 2015 through 2017 at least 70%, and thereafter the requirement rises to 100%. The 2008 EIS/EIR envisioned that LAHD would be responsible for the trucks and WBCT (the tenant/operator) would be responsible for necessary gate modifications and operations to track the LNG trucks to achieve compliance with this measure.

China Shipping has since informed LAHD that it may not be able to feasibly implement this measure at this time and still accommodate the projected growth in the volume of containerized cargo through the Port (LAHD, 2017a). Currently, only about 5% of the trucks operating at the ports of Los Angeles and Long Beach are LNG-fueled. The rest of the trucks are 2007-compliant diesel powered trucks, i.e., clean trucks, enrolled in the Clean Truck Program (CTP). Due to the size of the CS Container Terminal in relation to the overall port drayage market (in 2014 the terminal moved 6.7% of the 15 million TEUs of container cargo moved through the ports of Los Angeles and Long Beach), it may not be possible to require trucking companies to switch more of their fleets to LNG-fueled trucks to serve only the CS Terminal; in fact, as described more fully in LAHD (2017b), the number of LNG trucks in the CTP is actually decreasing from its 2009 high. Rather, the goods movement industry may take its business to other terminals. As described in Section 2.5.2 and LAHD (2017b), other constraints, including the structure of the drayage industry, the technological limitations of LNG-powered trucks, and the additional costs associated with the requirement to use LNG trucks, limit the feasibility of draying all of CS' cargo by LNG-fueled trucks.

1.3 Changes Proposed by the Revised Project

The Port has reviewed the feasibility information provided by China Shipping, summarized in Section 1.2.4.2, and concludes it would be beneficial to analyze whether the existing mitigation measures have feasibility or other technical, operational and practical problems hindering full and proper implementation. In addition, roadway circumstances have changed since the certification of the 2008 EIS/EIR and new information is available concerning traffic conditions at study area intersections that calls into question the need for certain ground transportation mitigation measures identified in the 2008 EIS/EIR. As a result, the Port has proposed certain changes to the operational mitigation measures to be analyzed in this SEIR and for possible inclusion in an amendment to Permit No. 999 or other lease agreement with the operator of the CS Container Terminal (Revised Project).

The Revised Project makes minor changes to the continued operation of the CS Container Terminal by modifying 10 operational mitigation measures and one lease measure originally adopted in the 2008 EIS/EIR. The Revised Project would eliminate some existing measures that have proved to be infeasible or unnecessary, institute new mitigation measures, and modify other existing measures to enhance their effectiveness. In proposing these changes, the Revised Project seeks to advance the original goals and objectives of the CS Container Terminal to maximize the efficiency and capacity of terminals while raising environmental standards through the application of all feasible mitigation measures.

Although the Notice of Preparation (NOP) circulated in September 2015 identified 10 mitigation measures and one lease measure as being the subject of this analysis, the LAHD is implementing one of the mitigation measures, MM NOI-2 Noise Walls, and a screening analysis (Appendix E) shows that the changes associated with the Revised Project do not result in new or more severe impacts requiring additional mitigation measures. Accordingly, that measure and the supporting noise analysis are not included in this Draft SEIR.

1.3.1 Mitigation Measures for Air Quality and Greenhouse Gas Emissions

China Shipping has implemented mitigation measures previously identified in the 2008 EIS/EIR to avoid or reduce the impacts of the CS Container Terminal. These measures are incorporated in the CS Container Terminal project and will continue to be implemented under the Revised Project.

Six mitigation measures (AQ-9, AQ-10, AQ-15, AQ-16, AQ-17, and AQ-20) have not been fully implemented at the CS Container Terminal. As described above, after China Shipping began operations, it informed LAHD that these measures cannot be feasibly implemented as originally intended; accordingly, modifications are necessary to achieve the purpose and intent of the measures. The Port has proposed changes to address feasibility, the availability of alternative technologies, and the effectiveness of the adopted measures. The Port is proposing to revise each of these mitigation measures and to analyze the revisions as part of the Revised Project. A seventh air quality mitigation measure, AQ-23, that was not implemented is considered in Section 1.3.3 as a lease

measure. The revised mitigation measures evaluated in this SEIR are summarized as follows:

- **MM AQ-9** modified to require that by January 1, 2018, all ships calling at Berths 97-109 must use AMP white hoteling in the Port, with a 95 percent compliance rate;
- **MM AQ-10** modified to require that by January 1, 2018, at least 95% compliance with Vessel Speed Reduction Program (VSRP) out to 40 nm for all vessels calling the CS Container Terminal, or alternative compliance plan approved by LAHD;
- **MM AQ-15** modified to require that all LPG yard tractors of model years 2011 or older shall be alternative fuel yard tractors that meet or exceed Tier 4 final off-road engine standards for PM and NO_x;
- **MM AQ-16** combined with MM AQ-17 because there is no actual distinction between railyard equipment and terminal equipment as a whole;
- **MM AQ-17** modified to require that: 1) all diesel-powered RTGs shall be diesel-electric hybrid with diesel engines that meet or exceed Tier 4 final off-road engine standards for PM and NO_x, with some units being all-electric, 2) diesel forklifts shall meet or exceed Tier 4 final off-road engine standards for PM and NO_x, with some being all-electric, 3) top picks shall meet or exceed Tier 4 final off-road engine standards for PM and NO_x, 4) sweepers shall be cleanest available alternative-fueled units by 2025, and 5) shuttle buses shall be all-electric by 2025;
- **MM AQ-20** eliminated from the Revised Project; some reductions in drayage truck emissions would be achieved by implementation of CAAP measures and Lease Measure LM AQ-2 (priority access for zero/near-zero-emission trucks), which is described more fully in Section 3.1.

Each proposed change to the existing mitigation measures is evaluated in this Draft SEIR to determine whether the change, when analyzed in the context of projected increases in terminal throughput as discussed in Section 1.4, results in a new environmental impact that was not previously analyzed and disclosed in the 2008 EIS/EIR or substantially increases the severity of an environmental impact defined in the 2008 EIS/EIR. If the Draft SEIR concludes the Revised Project will result in a significant impact on the environment, the Draft SEIR also analyzes whether the modifications above can be further revised, or if there are any additional feasible mitigation measures that could be adopted, to address such impacts.

Because these six operational mitigation measures were not fully implemented within the timeframe required by the 2008 EIS/EIR, this Draft SEIR also identifies and discusses the impacts of this delayed performance history (in Appendix D). These actions have already occurred and, as a result, they are not considered part of the proposed Revised Project. The analysis is provided for informational and disclosure purposes only.

1.3.2 Mitigation Measures for Transportation

On the basis of the screening studies (Appendix E1), LAHD determined that certain mitigation measures related to transportation (TRANS-2, TRANS-3, TRANS-4 and TRANS-6) warranted changes as follows:

- **MMs TRANS-2, TRANS-4**, and **TRANS 6** would not be implemented under the Revised Project;
- The remaining element of **MM TRANS-3** (provision of additional right-turn lane at the John S. Gibson/I-110 northbound ramps) that has not yet been implemented would not be completed under the Revised Project.

Each proposed change to these mitigation measures is evaluated in this Draft SEIR to determine whether the change, when analyzed in the context of projected increases in terminal throughput as discussed in Section 1.4, results in a new environmental impact that was not previously analyzed and disclosed in the 2008 EIS/EIR or substantially increases the severity of an environmental impact defined in the 2008 EIS/EIR. If the Draft SEIR concludes the Revised Project would result in a significant impact on the environment, the Draft SEIR also analyzes whether the modifications above can be further revised, or if there are any additional feasible mitigation measures that could be adopted to address such impacts.

1.3.3 Lease Measure for Throughput Tracking

A seventh air quality mitigation measure in the 2008 EIS/EIR, MM AQ-23, required the LAHD to track the cargo throughput of the CS Terminal and re-evaluate the impacts of terminal operations if throughput exceeds the projections in the 2008 EIS/EIR. The measure required re-evaluations in 2010, 2015, 2030, and 2045, which were the analysis years for the 2008 EIS/EIR. The measure did not mitigate a specifically identified impact, and in the 2008 FEIR's MMRP it was re-designated lease measure LM AQ-23.

The LAHD has removed this measure from the Revised Project. Throughput tracking occurs through standard Port data collection and the new analysis in the Draft SEIR already takes into account the maximum capacity of the terminal and growth in TEU volume, and applies all feasible mitigation measures to address future air quality impacts. Accordingly, periodic reviews of throughput are unnecessary.

1.4 Other Changes Since the Approval of the CS Container Terminal

1.4.1 Port and Terminal Operational Changes

1.4.1.1 Changes to the Berths 97-109 Terminal

The 2008 EIS/EIR assumed that at full capacity the CS Container Terminal would handle approximately 1,551,000 TEUs (twenty-foot equivalent units, a measure of containerized cargo capacity) per year, which is roughly equivalent to 838,380 standard shipping containers per year. That throughput would require 1,508,000 truck trips, 234 vessel calls, and 817 train trips per year. Those numbers were based on cargo forecasting performed in 2005. The document assumed that at full capacity approximately 83% of the containers would be moved in and out of the terminal by truck (including to regional intermodal railyards) and the rest would be moved by trains from the WBICTF.

Since the 2008 EIS/EIR, there have been a number of changes in the operational activity of the CS Container Terminal, including the difference between the forecasted throughput and the actual throughput, the degree to which mitigation measures in the original document have been implemented, and the availability of new technology in cargo-handling equipment since the 2008 analyses.

As discussed in Section 1.1, LAHD, determined that the larger physical capacity of the Terminal compared to the assumptions used in the 2008 EIS/EIR constitute "changed circumstances" or "new information" that require analysis in an SEIR. Accordingly, this Draft SEIR , in evaluating the impacts of operation of the CS Container Terminal under the Revised Project, assumes and analyzes impacts of an incremental increase in the Terminal throughput level in future years, based upon re-assessment of Terminal capacity, compared to the assumptions in the 2008 EIS/EIR.

1.4.1.2 San Pedro Bay Ports Cargo Demand Forecast

This section presents background information on long-term containerized cargo growth at the Ports. Facilities planning must take into account both the economy's demand for cargo and the capacity of the Ports and associated transportation infrastructure to handle that cargo. Long-term cargo growth forecasts are used as planning tools to understand and predict cargo volumes and Port-related activities for the movement of cargo. Terminal planning involves balancing existing and potential physical and operational capacities with market demand projections for cargo. As is described below, the demand forecasts and the capacity modeling demonstrate a need for the Ports to be improved and expanded to accommodate future demand.

In the last 40 years, containerized shipping through West Coast ports in the United States has increased twentyfold, driven by outsourcing of U.S. manufacturing and increasing trade with Asian economies. Major West Coast ports, particularly the ports of Los Angeles, Long Beach, Oakland, and Seattle-Tacoma, have continued to invest billions of dollars to optimize facilities and accommodate increases in containerized shipping. These investments are necessary because most marine terminals across the country were

not designed to handle the larger vessels that are projected to enter the fleet mix over time. Taller, wider cranes are required to lift from increased stack heights on vessels and to reach across the additional rows of containers on the larger vessels. In some cases, structural improvements to wharves may be required to support the larger and heavier cranes and/or vessels. Ports have deepened their channels and berths to accommodate larger container ships; demolished existing facilities and built new container terminals in their place; and created new land to provide space for additional container terminal backlands. The Port of Los Angeles and USACE Channel Deepening project, completed in 2013, deepened the Port's 45-foot deep Main Channel, West Basin Channel and East Basin Channel to a 53-foot depth and is intended to allow for the navigation of these larger vessels in future years (USACE and LAHD, 2009).

Terminal-specific improvements are required, including berth deepening, larger cranes, wharf improvements, expansion of backlands, and rail improvements to accommodate the larger vessels and associated cargo. Some marine terminal operators have purchased high-speed cranes, modernized transportation equipment, and introduced terminal automation to move containers more rapidly between ships and trucks or trains. These and other improvements represent an ongoing effort to accommodate the anticipated growth in cargo. Major projects are planned for both the Port of Los Angeles and the Port of Long Beach well into the future.

To plan, design, and construct infrastructure, the Ports frequently develop detailed macro-economic cargo forecasts along with detailed terminal capacities (including micro-simulation). Anticipating the continued importance of containerized shipping, the Port of Los Angeles and Port of Long Beach, along with USACE, conducted a series of studies to forecast cargo volumes through 2020 and evaluate the capacity of the San Pedro Bay Ports with respect to accommodating such cargo volumes. The cargo forecasts predicted significant increases in containerized cargo from Pacific Rim countries to the Pacific West Coast and the San Pedro Bay Ports. These forecasts were used as a basis for development of an operations, facilities, and infrastructure study. That study concluded that the Ports needed to provide substantial additional physical facilities and make operational improvements to provide the necessary capacity.

The resulting San Pedro Bay 2020 Plan included the construction of new container terminals and the optimization of existing terminals at the Ports. From the early 1990s to 2007, actual volumes of containerized cargo passing through the Ports exceeded the forecasts of the 2020 Plan. Accordingly, the Ports commissioned two market-based forecasts, one in 2007 (Tioga, 2007) and an update in 2009 (Tioga, 2009).

The 2007 cargo forecast predicted that economic growth would result in a demand of 65,100,000 TEUs through the San Pedro Bay ports in 2030 (this was an unconstrained forecast, meaning that it did not take into account whether the Ports could actually accommodate that much cargo). The 2009 update was prompted by a severe global recession, beginning in 2008, that dramatically affected international trade, resulting in volumes at the Ports that were significantly below 2006 peak volumes. The 2009 update predicted that it would take six to seven years the peak volumes of 2006 to return to the Ports. It also predicted that the Ports would continue to grow at a slower pace than predicted in the 2007 forecast, resulting in a gap between the new and the old forecasts that would widen over time. The 2009 forecast, which was also unconstrained, projected an annual throughput of 34,600,000 TEUs through the Port Complex by 2030 (Tioga, 2009). The Ports extended this market forecast, yielding a predicted demand of 41,369,000 TEUs in the Port Complex by 2035.

Although the 2009 forecast provided the basis for port planning for a number of years, the ongoing economic recovery and a number of other factors that could affect future cargo volumes prompted the Ports to undertake a new cargo forecast. The 2016 forecast (Mercator International and Oxford Economics, 2016) incorporated new economic growth factors and considered the effects of such factors as the imminent completion of the Panama Canal expansion, increased marine terminal costs at the Ports, and the growth of competitive West Coast ports such as Prince Rupert, BC. The 2016 forecast, which, like the previous ones, is unconstrained, considered nine scenarios of combinations of economic growth rates and rates of cargo diversion to other ports. The "base case" used the expected macro-economic assumption of an average combined annual growth rate (CAGR) of 4.0% (rather than high or low growth rates) and assumed an intermediate level of cargo diversion. (A high level of cargo diversion to other ports would result in lower cargo volumes through the San Pedro Bay Ports, and vice versa.)

That scenario, which the Ports will use for planning purposes, predicts that cargo demand will reach 34.3 million TEUs in 2035 (very similar to the 2009 forecast for 2030) and 41.1 million TEUs in 2040 (Figure 1-2). The low-economic-growth scenario with a high level of diversion resulted in a demand of 30.9 million TEUs in 2040, and the high-growth/low diversion scenario resulted in a demand of 54.5 million TEUs in 2040. Containerized cargo trade through the Port Complex is expected to grow at a compound annual growth rate (CAGR) of 4.0% over this time period, driven primarily by trade with Northeast Asia (China, Japan, and South Korea) and Southeast Asia, for which the Port Complex will continue to be the major gateway.

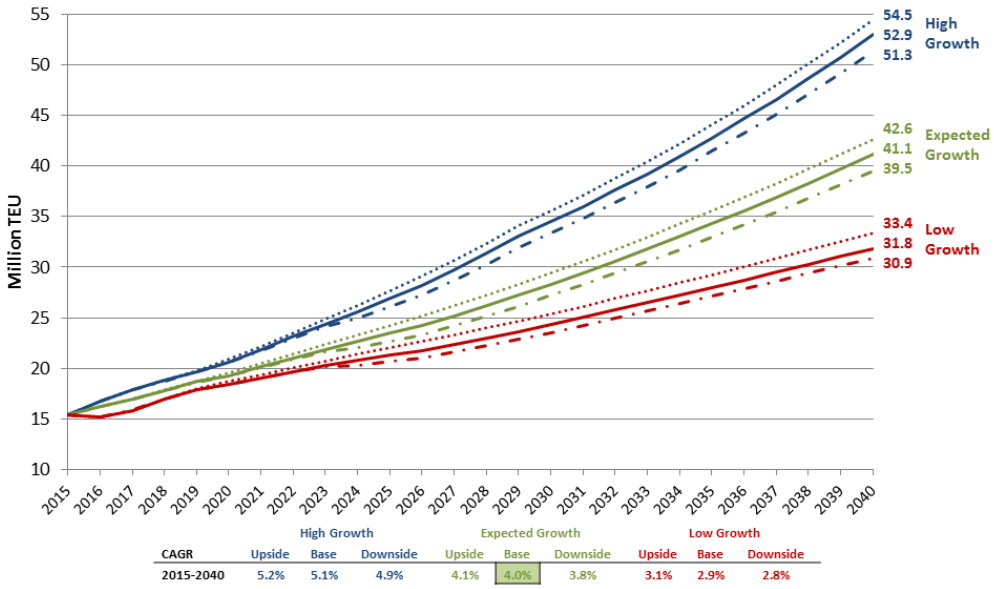
1.4.1.3 San Pedro Bay Container Terminal Capacity

In addition to forecasting future cargo volumes, the Ports evaluate the physical and operational capacity of the marine terminals to handle those volumes. To estimate the future maximum or optimal capacity of each terminal through 2045, the Ports use a methodology that relies on two capacity models: one that analyzes the terminals' backland (i.e., container yard, or CY) capacity and one that analyzes the terminals' berth capacity (a terminal could be berth constrained or backlands constrained or evenly balanced between the two). For the CY capacity, the Port has also utilized a simulation model to aid the estimate of overall terminal capacity, when and where appropriate. The modelers make realistic assumptions regarding different physical improvements (e.g., increasing the length of a berth or adding more container yard) and operating parameters (e.g., increasing the number of hours worked per day or crane productivity, decreasing the amount of time containers are allowed to remain in the terminal, or the recently introduced practice of using peel off yards) to estimate the future operating capacity of each terminal, including ones projected to be built. The container handling capacity of the peel off yards was estimated using a model which is normally utilized for determining container yard capacities. For peel-off yards, the model was adjusted to reflect an all-wheeled container storage operation. With this assumption, the peel-off yards combined are expected to add an additional 591,000 TEUs worth of container handling capacity.

The assumptions, while reasonable, are not conservative; for example, terminals are assumed to be able to reach throughput levels greater than 10,000 TEUs per acre per year compared with current throughput levels of between 5,000 and 7,000 TEUs per acre. This approach allows the Ports and their businesses to identify shortfalls between future cargo volumes and the capacity of the terminals and supporting infrastructure (e.g., roads

and railroads) to handle those volumes. POLA has updated capacity analyses for its terminals since the last cargo forecast of 2009; POLB terminal capacities were obtained directly from the POLB staff.

Figure 1-2: Cargo Demand Through the San Pedro Bay Ports, 2015 - 2040.



The environmental analysis in this Draft SEIR assumes that the physical and operational capacities of Port container terminals will be fully utilized by future cargo volumes. The results of the capacity modeling show that, with the assumed changes in physical configurations and operating practices, the maximum capacity of the San Pedro Bay Ports is projected to be approximately 35,217,000 TEUs. That estimate of total marine terminal capacity exceeds the forecasted 2035 cargo demand of approximately 34,281,000 TEUs, meaning that the Ports will be able to handle demand at least to 2035. Thereafter, the modeling results show cargo volumes increasing up to the Ports' maximum capacity by 2040. Actual throughput might be lower because of changes in consumer demand patterns and/or economic conditions. However, to be conservative this Draft SEIR assumes that the Ports will operate at their maximum capacity by 2036.

1.4.1.4 San Pedro Bay Ports Intermodal Cargo Demand and Capacity

In 2014, approximately 37% of all containers were conveyed directly between Port terminals and intermodal rail facilities, the majority being transported via on-dock railyards. Direct intermodal cargo has generally remained at around 40% for the last 10 to 15 years but the 2016 cargo forecast (Table 1-1) predicted that the proportion moved via on-dock in the future will be approximately 33% (Mercator International and Global Economics, 2016). The projections in Table 1-1 are used in this Draft SEIR.

A key factor in the current forecast is the future capacity of on-dock rail facilities and their operational constraints, because direct intermodal cargo that cannot be handled by on-dock yards must be handled by near/off-dock yards. The goal of the Ports is to maximize on-dock rail operations within the Ports. To achieve this goal, the Ports encourage the marine terminals to schedule round-the-clock shifts and optimize labor rules, and the railroads have increased operational efficiencies, and hence capacity, at on-dock facilities. Furthermore, both Ports plan to expand their rail infrastructure over the next ten years to increase on-dock rail capacity more than two-fold (Table 1-2 and Figure 1-3 show existing and planned on-dock facilities). If all of the proposed changes can be constructed on the assumed timetable, on-dock use is projected to reach approximately 9,150,000 TEUs by 2035 (Table 1-1).

Table 1-1: San Pedro Bay Ports Direct Intermodal Cargo Forecast (TEUs)

Year	2014	2023	2030	2036-2045
San Pedro Bay Ports Demand/Capacity	15,120,806	22,264,950	28,651,411	35,217,000
On-Dock	4,063,995	5,648,656	7,449,255	9,154,058
(percent of total)	26.9%	25.4%	26.0%	26.0%
Off-/Near-Dock	1,466,854	1,924,940	2,005,710	2,467,552
(percent of total)	9.7%	8.6%	7.0%	7.0%
Total LA/LB Intermodal	5,530,849	7,573,596	9,454,965	11,612,610
(percent of total)	36.6%	34.0%	33%	33%
Transloaded to rail (via 53-ft containers)	2,106,819	3,474,453	4,396,224	5,322,376
Note: 2014 represents actual intermodal cargo movements, 2023 and 2030 figures are forecasted demand, and the 2036-2045 figure is maximum capacity				

Table 1-2: Existing and Planned On-Dock Railyards

On-Dock Rail Facility	Location and Terminal(s) Served	Status
Terminal Island ICTF	Port of Los Angeles: YTI and Everport terminals	Operating; expansion by YTI under construction
Pier 300	Port of Los Angeles: Eagle Marine Services Terminal	Operating; proposed expansion
Pier 400	Port of Los Angeles: APM Terminal	Operating; proposed expansion
West Basin Container Terminal	Port of Los Angeles: serving YM and CS terminals	Operating; proposed expansion analyzed herein and in YM EIS/EIR (in preparation)
TraPac Container Terminal	Port of Los Angeles: TRAPAC	Operating in mid-2016
Pier G	Port of Long Beach: International Transportation Services Terminal	Operating; proposed expansion
Middle Harbor	Port of Long Beach: Pier railyard currently serving LBCT/CUT	Expansion completion expected late 2019 (LBCT IY operating)
Pier A	Port of Long Beach: SSA Pier A Terminal	Operating; proposed expansion

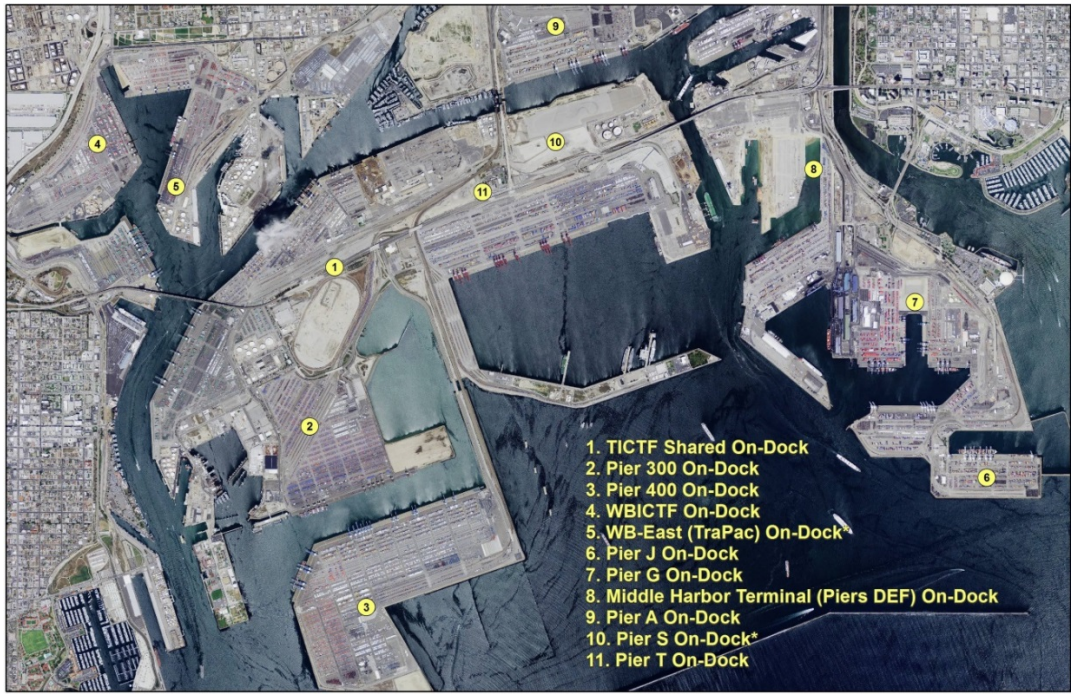
Table 1-2: Existing and Planned On-Dock Railyards

On-Dock Rail Facility	Location and Terminal(s) Served	Status
Pier T	Port of Long Beach: TTI Terminal	Operating

1.4.1.5 China Shipping Container Terminal Operational Changes

Based on this updated analysis of cargo demand and capacity, LAHD has estimated that, as presently configured, the Berths 97-109 Container Terminal's maximum capacity is 1,698,504 TEUs per year. Under current assumptions of cargo growth, that capacity will be reached by 2030. The 2008 EIS/EIR estimated the terminal's maximum capacity at 1,551,000 TEUs per year, meaning that the new estimate is approximately ten percent greater than the original estimate.

Figure 1-3: Existing and Proposed On-Dock Railyards in the San Pedro Bay Port Complex



1.4.2 Regulatory Changes

The regulatory framework has changed since the 2008 EIS/EIR. While these changes do not require the preparation of this Draft SEIR, this document will apply these new standards in evaluating the impacts of the Revised Project. The key change is the result of Senate Bill (SB) 97 (CEQA Guidelines), which became effective in 2010, and the South Coast Air Quality Management District's (SCAQMD's) greenhouse gas (GHG) CEQA thresholds guidance, which became effective in 2011. These regulatory initiatives are described in more detail in Section 3.2.3.2 of this Draft SEIR. Briefly, SB 97 requires

EIRs to evaluate GHGs more comprehensively, and the SCAQMD guidance sets a significance threshold of 10,000 metric tons on Carbon Dioxide equivalent (CO_2e) emissions per year. In response to these and other regulatory initiatives, the LAHD determined that it would be appropriate to consider GHG impacts in a separate section of Chapter 3, Environmental Analyses, of its EIRs, rather than as part of the air quality analysis, as was done in the 2008 EIS/EIR. Accordingly, GHG is in Section 3.2 of this Draft SEIR.

This Draft SEIR will also apply a change in the scope of highway traffic delay impact analysis. Pursuant to standards in the 2004 County of Los Angeles Congestion Management Program (CMP), only one freeway location was analyzed in the 2008 EIS/EIR. In October 2013, "An Agreement Between the City of Los Angeles and Caltrans District 7 On Freeway Impact Analysis Procedures" was entered into by the City of Los Angeles and Caltrans. The agreement described new freeway impact analysis screening criteria and analysis methodology, mitigation options and coordination. In accordance with that agreement, the Draft SEIR includes many more highway traffic delay analysis locations than were previously prescribed under the CMP.

1.5 Lead, Responsible and Trustee Agencies

CEQA defines the role of "lead agency" as the public agency that has principal responsibility for carrying out or approving a project. The CEQA lead agency will decide whether an EIR or negative declaration will be required and will cause the document to be prepared (Guidelines Section 15367).

Other agencies could have special roles with respect to the Revised Project, and if so, will use this Draft SEIR as the basis for their decisions to issue any approvals and/or permits that might be required. Section 15381 of the State CEQA Guidelines defines a "responsible agency" as:

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

Additionally, Section 15386 of the State CEQA Guidelines defines a "trustee agency" as "…a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California".

Several lead, responsible, and trustee agencies could rely on this Draft SEIR in a review capacity or as a basis for issuance of a permit or other approval for the Revised Project. Specifically, LAHD as the lead agency will use this document when considering approval of the Revised Project, a new lease for the CS Container Terminal, and implementation of the mitigation measures. The California Department of Transportation (Caltrans), the City of Los Angeles Transportation Department (LADOT), and the Los Angeles Department of Building and Safety may use the document when considering approvals for the implementation of any transportation mitigation measures.

1.6 Scope of Analysis and Content of the SEIR

1.6.1 Notice of Preparation and Initial Study

The scope of this Draft SEIR was established based on the Initial Study prepared pursuant to CEQA and comments received during the Notice of Preparation (NOP) review process. The NOP was posted on September 18, 2015 (Appendix A). A public scoping hearing was conducted on October 7, 2014, in San Pedro. Public comments were received in person during the scoping meeting and by letter during the public review period, which was September 18 to October 19, 2015. Many comments referenced issues that are not part of the Revised Project and therefore not addressed in the Draft SEIR, but to the extent comments are relevant to the Revised Project, Table 1-3 summarizes the key issues and references to the sections of this Draft SEIR addressing them.

Table 1-3: Summary of Key NOP Comments

Commenter	Key Issues Raised	Where Addressed
	Comment Letters	
South Coast Air Quality Management District (SCAQMD)	• Ensure that the newly approved project does not backslide on the level of control and emission reductions provided by the previously approved mitigation. • Implement all feasible mitigation, even if it provides additional reductions beyond what had previously been approved in 2008, with the goal of reducing impacts to a level below significance. • Per MM AQ-22, deploy the lowest emission technologies possible wherever feasible including those "capable of being accomplished in a successful manner within a reasonable period of time" (Public Resources Code §21061.1), such as zero and near-zero emission technologies that are expected early in the life of the project. • Analyze the environmental impacts from actual existing conditions and what they should have been had all mitigation been implemented fully in the past, and into the future. • The consistency of this project with the AQMP should be fully analyzed.	Chapter 2 Project Description, Section 3.1 Air
Los Angeles County Metropolitan Transportation Authority (LACMTA)	• Re-evaluate LOS at nearby intersections for impact on Metro bus 246. • Mitigate any impacts on Red Car Trolley service. • Evaluate and mitigate impacts on other bus routes in San Pedro. • Prepare a Transportation Impact Analysis per CMP requirements.	Section 3.3, Transportation

Table 1-3: Summary of Key NOP Comments

Commenter	Key Issues Raised	Where Addressed
	• Requests a copy of the draft EIR.	
James Allen	• Include citizen oversight in the SEIR as a mitigation measure.	Not part of Revised Project
Jack Brisley	• Displeasure at LAHD actions	Not a CEQA issue
Citizens for a Safe Environment	• Request subsequent, not supplemental, EIR and a NEPA document.	Section 1.1
	• Re-write NOP to include specific measures.	Not part of SEIR
	• 3rd party monitor for MMRP.	Not a CEQA issue
	• Penalties for non-compliance with MMRP	Not a CEQA issue
	• State-of-the-art mitigation measures.	Chapter 3
	• Update emissions inventory to include unmitigated emissions.	Section 3.1, Air
	• Include various goods movement and emissions assessments.	Not part of SEIR
	• Include environmental justice assessment.	Not a CEQA issue
Chuck Hart (San Pedro & Peninsula Homeowners Coalition)	• Revise emissions inventory to include unmitigated emissions.	Section 3.1 (Air)
	• 3rd party MMRP monitor.	Not a CEQA issue
	• Reconstitute PCAC.	Not a CEQA issue
	• Request subsequent, not supplemental, EIR and a NEPA document	Section 1.1 Purpose
	• Include environmental justice assessment.	Not a CEQA issue
	Explain “other factors”.	Chapter 1 Introduction, Section 2.5 Project Description
	• Use latest AQ standards, not those from 2008.	Section 3.1, Air
	• MM AQ-22 is now in effect and must be incorporated into the SEIR.	Section 3.1, Air
	• Disclose excess emissions and health risk.	Section 3.1, Air
	• Conduct a Health Impact Assessment.	Section 3.1 Air
	• Suggestions for the mitigation measures in the NOP.	Sections 3.1, Air, 3.3, Transportation
Richard Havenick	• Identify new mitigation measures.	Chapter 3, Environmental Analysis
Andrea Hricko	• Include Starcrest tenant survey data on China Shipping activities regarding air mitigation measures.	Data incorporated into analyses in Section 3.1, Air
	• Calculate the extra pollution resulting from non-compliance 2008 – 2015.	Section 3.1, Air
	• Mitigation for noise cannot be dismissed.	Not part of Revised Project

Table 1-3: Summary of Key NOP Comments

Commenter	Key Issues Raised	Where Addressed
Terry & John Miller (San Pedro & Peninsula Homeowners Coalition) (3 letters)	• Same comments as Chuck Hart, above.	See Hart, above
Natural Resources Defense Council et al. (NRDC et al.)	• Feasibility and implementation of mitigation measures, including ones imposed equally on TraPac.	Section 2.5, Project Description, Section 3.1, Air
	• Incorporate state-of-the-art mitigation measures such as low-NO_x LNG trucks, ship emissions capture technology.	Section 3.1, Air
	• Disclose excess emissions due to non-compliance 2008 – 2015.	Section 3.1, Air
	• Make restitution for excess emissions.	Not a CEQA issue
	• Analyze excess future emissions.	Section 3.1, Air
	• Formulate MMRP with 3rd party oversight.	Not a CEQA issue
	• Implement MM AQ-22 to review feasibility.	Not part of SEIR
	• Analyze compliance with local, state, and federal laws and the ASJ.	Section 2.7
	• Suggestions regarding the feasibility of the mitigation measures being considered in the SEIR.	Chapter 3
	• Consider additional mitigation measures including accelerated CARB cold-ironing, phasing out old trucks, zero-emissions cargo movement technologies, ship emissions capture technology, maximization of on-dock rail, all-electric yard tractors, lease termination for non-compliance, publication of compliance monitoring, funding TAP, and funding Harbor Community Benefit Foundation.	Section 3.1 Air
Northwest San Pedro Neighborhood Council	• Exceed CAAP and NNI.	Section 3.2, Air
	• Evaluate traffic west of I-110 and on N. Gaffey, Summerland to Anaheim.	Section 3.3, Transportation
	• Evaluate impact of lights.	Not part of Revised Project
	• Berth 302-306 truck fleet modernization.	Not part of Revised Project
	• Apply new technology and validate emissions reductions.	Section 3.1, Air
	• Complete walking/bike path north of the Cruise Terminal.	Not part of Revised Project
	• Retain transportation improvement mitigation measures.	Section 3.3, Transportation

Table 1-3: Summary of Key NOP Comments

Commenter	Key Issues Raised	Where Addressed
	• Mitigate impacts by emphasizing public transportation.	Section 3.3, Transportation
	• Mitigate perceived noise impacts.	Not part of Revised Project
	• Paint the cranes to mitigate aesthetic impacts.	Not part of Revised Project
	• Evaluate increased transportation hazard.	Section 3.3 Transportation
Southern California Environmental Justice Alliance (identical letter and e-mail)	• Evaluate the effectiveness of MMs AQ-9, AQ-10, AQ-17-AQ-17, AQ-20, and AQ-23.	Section 3.1 Air
	• Evaluate the project's potential to violate air quality standards and emit TACs.	Section 3.1 Air
	• Evaluate greenhouse gas emissions.	Section 3.2 GHG
	• Evaluate noise impacts.	Not part of SEIR
	• Evaluate traffic impacts related to LOS and V/C ratios at local intersections.	Section 3.3, Transportation
	• Evaluate cumulative impacts of air, noise, transportation, and GHG emissions.	Sections 3.1 Air, 3.2 GHG, 3.3, Transportation
June Smith	• Re-analyze the entire project.	Section 1.1 Purpose
	• 3rd party monitoring of MMRP and future agreements.	Not part of SEIR
San Pedro & Peninsula Homeowners Coalition	• Same comments as Chuck Hart, above.	See Hart, above
Peter Warren	• Explain "other factors".	Section 2.5 Project Description
	• Prepare an entirely new EIR, not an SEIR.	Section 1.1 Purpose
Oral Comments at NOP Public Hearing		
David Petit (NRDC)	• Look to Middle Harbor for feasible mitigation to apply to China Shipping.	Section 3.1 Air
	• Analyze consistency with state and regional statutory framework.	Sections 2.7 Relationship to Plans and 3.1 Air
	• Implement low emissions trucks per the ESCAPE project.	Section 3.1 Air
James Allen	• Produce the MMRPs from 2008 to now.	Not part of SEIR

1.6.2 Scope of This Draft SEIR

This Draft SEIR supplements and makes adequate the information provided in the 2008 EIS/EIR for the purposes of the LAHD's consideration of the proposed modifications to mitigation measures which constitute the Revised Project. The purpose of this SEIR is to

examine the potentially new significant environmental impacts or substantially more severe impacts of the Revised Project compared to the impacts of the Approved Project identified in the 2008 EIS/EIR.

During preparation of this Draft SEIR, it was determined that capacity of the CS Container Terminal had increased incrementally compared to the capacity level identified for the Terminal in the 2008 EIS/EIR, due to the factors and information discussed in section 1.4.2, above. A decision was made that this Draft SEIR, in analyzing the impacts of the proposed modifications to mitigation measures which constitute the Revised Project, would assume that CS Container Terminal throughput under the Revised Project will gradually increase to an incrementally higher full-capacity throughput level compared to that assumed in the 2008 EIS/EIR. The revised throughput assumptions for this Draft SEIR are shown in Table 2-3.

In accordance with Sections 15126.2 and 15163 of the CEQA Guidelines, this Draft SEIR identifies and focuses on the significant direct and indirect environmental effects on the physical environment of proposed changes to the CS Terminal Project, changed circumstances surrounding that project, and new information of substantial importance to that project. This Draft SEIR analyzes whether operation of CS Terminal under the Revised Project, at throughput levels assumed to increase incrementally over the levels assumed in the 2008 EIS/EIR as shown in Table 2-3 and based on the factors and information described in section 1.4.2, would result in new or substantially more severe significant effects on the environment, compared to the impacts disclosed in the 2008 EIS/EIR. Updates to the 2008 EIS/EIR are provided only where mitigation measures have been modified or information updated, and where discussion of these changes is necessary to provide sufficient analysis of impacts. Subjects are as addressed in Chapter 3.0, Environmental Impact Analysis, of this Draft SEIR include:

- Air Quality
- Greenhouse Gases and Climate Change
- Transportation

The Initial Study included in the NOP stated that noise would be considered in the Draft SEIR because MM NOI-2 had not been completed. However, the mitigation measure did not specify a completion date for that measure and the LAHD is conducting an analysis, per the requirements of the measure, to define implementation of the measure. Furthermore, a screening analysis (Appendix E) conducted by the LAHD has demonstrated that the increases in throughput of the Revised Project compared to the Approved Project would not cause substantial increases in noise levels at sensitive receptors. For these reasons, noise is not considered in the Draft SEIR.

The Initial Study included in the NOP concluded that the following issues would involve no significant impact and need not be evaluated in the Draft SEIR: Biological Resources, Cultural Resources, Geology, Groundwater and Soils, Hazards and Hazardous Materials, Land Use/Planning, Marine Transportation, Public Services, Recreation, Utilities/Service Systems, and Water Quality. LAHD reevaluated the scope of impacts covered in the Draft SEIR when, following the NOP review process, it was determined that capacity of the CS Container Terminal had increased incrementally compared to the capacity level identified for the terminal in the 2008 EIS/EIR. That analysis, which is presented in Appendix E of the Draft SEIR, confirms that the Draft SEIR is not required to assess the impact areas other than Air Quality, GHG, and Transportation.

This Draft SEIR has been prepared by Ramboll under contract to LAHD and has been reviewed independently by LAHD staff. The scope of the document, methods of analysis and conclusions represent the independent judgments of the LAHD. Staff members from LAHD and Ramboll who helped prepare this Draft SEIR are identified in Chapter 11, List of Preparers and Contributors.

1.6.3 Content of This Draft SEIR

This Draft SEIR is organized into seven chapters; two chapters normally included in EIRs – Growth-Inducing Impacts and Significant Irreversible Changes – are not included in this Draft SEIR because, since the terminal was built and is operating essentially as considered in the 2008 EIS/EIR, these issues do not require additional analysis. The seven chapters are:

Chapter 1.0, Introduction: This chapter summarizes the background of the project and explains the environmental review process.

Chapter 2.0, Project Description: This chapter provides a detailed description of the proposed Revised Project, including the specific changes proposed to the mitigation measures and explanation for why such changes are sought.

Chapter 2 also discusses how the baselines used in this Draft SEIR were developed and applied for the Revised Project. The purpose of a supplemental EIR is to determine whether modifications to a project would result in new or substantially more severe significant environmental impacts than disclosed in a prior EIS/EIR. In the typical case, a supplemental EIR would adopt as its baseline the full build-out of the approved project analyzed under the prior EIS/EIR, regardless of whether that project has been fully constructed. Thus, for this Draft SEIR, it is proper to use the approved CS Container Terminal, as fully mitigated, as the baseline conditions for evaluating the impacts of the Revised Project and to disclose the incremental change in environmental impacts between the Approved Project and the Revised Project. An explanation on how this baseline is applied to specific resource areas is provided in Section 2.6.

Chapter 3.0, Environmental Impact Analysis: This chapter includes an assessment of the impacts of the Revised Project, mitigation for those impacts determined to be potentially significant, and a discussion of the changes in these impacts as compared to those identified in the 2008 EIS/EIR analysis. This chapter is divided into main sections for each of the three resource areas, i.e., Transportation, Air Quality, and Greenhouse Gases) that describe relevant changes to the environmental setting since 2008 and discuss the impacts of the Revised Project in comparison with those of the approved CS Container Terminal project.

To determine whether the proposed action would have significant and unavoidable impacts on the environment, impacts resulting from implementation of the Revised Project are compared to the baseline condition, as discussed above. The difference between the Revised Project and the baseline is then compared to a threshold to determine if the difference between the two is significant.

The criteria for determining the significance of environmental impacts in this Draft SEIR analysis are described in the section titled “Significance Criteria” under each resource topic in Chapter 3. The threshold of significance for a given environmental effect is the level at which the LAHD finds a potential effect of the Revised Project to be significant. “Threshold of significance” can be defined as a “quantitative or qualitative standard, or

set of criteria, pursuant to which significance of a given environmental effect could be determined" (CEQA Guidelines, Section 15064.7 [a]).

The significance thresholds are used here to evaluate whether the incremental change from the Revised Project results in any new impact or substantially increases the severity of a prior impact. As described earlier, the Revised Project consists of modifications to certain mitigation measures for the approved CS Container Terminal. Except as proposed to be modified by the Revised Project, all mitigation measures adopted by 2008 EIS/EIR to reduce and alleviate potential impacts of the CS Container Terminal have been implemented or are underway and are incorporated into the project. Consequently, for this SEIR, the impact significance under CEQA for the Revised Project has been determined assuming that the previously adopted mitigation measures will continue to be implemented, except those proposed to be modified by China Shipping and LAHD for the Revised Project.

Based on this, potential impacts from the Revised Project can be categorized into four types

- No Impact: No environmental impacts would occur from the Revised Project.
- Less-than-Significant Impact: Environmental impacts from the Revised Project would not be significant, or if they would be, they would be significantly reduced with the feasible mitigation measures adopted from the 2008 EIS/EIR and the modifications proposed for the Revised Project.
- No Significant Impact with Additional Mitigation: Environmental impacts from the Revised Project would be significant and adverse but could be significantly reduced with additional, newly proposed feasible mitigation measures identified in this Draft SEIR.
- Significant and Unavoidable Impact: Environmental consequences of the Revised Project would be substantial and adverse and would remain so even with implementation of the feasible mitigation measures identified in this Draft SEIR.

Chapter 4.0, Cumulative Impacts Analysis: This chapter describes the cumulative project scenario, updated with current information.

Chapter 5.0, References: This chapter identifies the materials and documents consulted in preparing this Draft SEIR.

Chapter 6.0, List of Preparers and Contributors: This chapter lists the individuals involved in preparing this Draft SEIR.

Chapter 7.0, Glossary, Acronyms, and Abbreviations: This chapter the full names for acronyms and abbreviations used throughout this document.

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

1.6.4 New Mitigation Measures to Address Significant Effects

The Revised Project would require new mitigation measures, in addition to those previously adopted and incorporated into the CS Container Terminal project and

modified by the Revised Project, to address significant impacts. The new mitigation in this Draft SEIR is:

MM GHG-1 LED Lighting: All lighting within the interior of buildings on the premises and outdoor high mast terminal lighting will be replaced with LED lighting or a technology with similar energy-saving capabilities.

MM TRANS-2 Alameda & Anaheim Streets: Provide an additional eastbound through-lane on Anaheim Street. This mitigation measure shall be implemented at the same time as the City's planned improvement project at this location, with design/construction commencing in the first quarter of 2019, subject to LADOT approval.

MM TRANS-3 John S. Gibson Boulevard and I-110 N/B Ramps: Provide an additional westbound right-turn lane with westbound right-turn overlap phasing and an additional southbound left-turn lane. LAHD shall monitor the intersection LOS annually beginning in 2018 and LAHD shall implement the mitigation within three years after the intersection level of service (LOS) is measured as D or worse, as a result of cumulative traffic to which the China Shipping terminal would contribute, with the concurrence of LADOT.

1.6.5 Significant and Unavoidable Effects

1.6.5.1 Project-Level Effects

The Revised Project would result in the following adverse project-level effects even after implementation of the new recommended mitigation measures:

Air Quality

In the case of air quality, the mitigation measures proposed to be modified under the Revised project were part of a larger suite of measures identified in the 2008 EIS/EIR to address operational air emissions, ambient concentrations, toxic air contaminants and greenhouse gas emissions impacts of the CS Container Terminal project. The 2008 EIS/EIR determined that these impacts, even with implementation of all mitigation measures, remained significant and unavoidable for the CS Container Terminal project.

The Revised Project would have a significant and unavoidable impact related to criteria pollutants because emissions of carbon monoxide (CO) would exceed significance criteria in all four analysis years even after mitigation.

The Revised Project would have a significant and unavoidable impact related to ambient concentrations of PM_{10}, which would exceed significance thresholds in 2030, 2036 and 2045.

The Revised Project would have a significant and unavoidable impact related to toxic air contaminants. Cancer risks relative to the future (floating) Mitigated Baseline would be significant for residential, occupational and sensitive receptor types; cancer risks relative to the fixed (2014) Mitigated Baseline would be significant for the residential and sensitive receptor types.

Greenhouse Gases

GHG emissions from the Revised Project in year 2045 would be significant and unavoidable even after mitigation.

Ground Transportation

Implementation of MM TRANS-2 would avoid an identified impact on operating conditions at the intersection of Alameda and Anaheim Streets (Study Location #3), but would require approval from LADOT. Because LADOT approval is not guaranteed, the Revised Project would have a significant and unavoidable impact. If LADOT approves the implementation of this mitigation measure, then the impact will be reduced to less than significant.

1.6.5.2 Cumulative Effects

The Revised Project, in combination with past, present and reasonably foreseeable future projects, would result in the following adverse cumulative effects even after implementation of the new recommended mitigation measures:

Air Quality

The Revised Project, in combination with past, present and reasonably foreseeable future projects, would make significant cumulative impacts to criteria pollutant emissions, ambient pollutant concentrations, and human health risk.

The Revised Project would make a cumulatively considerable contribution to a significant and unavoidable cumulative impact related to criteria pollutants because emissions of carbon monoxide (CO) would exceed significance criteria.

The Revised Project would make a cumulatively considerable contribution to a significant and unavoidable cumulative impact related to ambient concentrations of PM_{10}.

The Revised Project would make a cumulatively considerable contribution to a significant and unavoidable cumulative impact related to cancer risk.

Greenhouse Gases

The Revised Project, in combination with past, present and reasonably foreseeable future projects, would make significant cumulative impacts to GHG emissions. The Revised Project would make a cumulatively considerable contribution to a significant and unavoidable cumulative impact related to GHG emissions because GHG emissions would exceed 10,000 mt per year.

Ground Transportation

Implementation of MM TRANS-2 would avoid an identified cumulative impact on operating conditions at the intersection of Alameda and Anaheim Streets (Study Location #3), but would require approval from LADOT. Because LADOT approval is not guaranteed, the Revised Project would have a significant and unavoidable cumulative impact. If LADOT approves the implementation of this mitigation measure, then the cumulative impact will be reduced to less than significant.

1.7 Alternatives to the Revised Project

The Revised Project consists of modifications to mitigation measures for the previously approved CS Container Terminal project. It does not propose substantive modifications to the CS Container Terminal, but instead seeks to further achieve and support the purpose and objectives for the Approved Project.

According to the CEQA Guidelines, an SEIR is required when "[o]nly minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation" (CEQA Guideline § 15163(a)(2)). As a result, this Draft SEIR contains only the information necessary to make the 2008 EIS/EIR adequate for the Revised Project. (CEQA Guideline § 15163(b).)

The 2008 EIS/EIR analyzed a reasonable range of alternatives to the Approved Project. Section 2.5 and Chapter 6 of the 2008 EIS/EIR provide extensive information on the development and screening of those project alternatives. These alternatives included:

- Proposed Project
- No Project Alternative
- No Federal Action Alternative
- Reduced Fill Alternative, No Berth 102 wharf
- Reduced Fill Alternative, No Berth 100 South
- Reduced construction and operation: Phase I construction only
- Omni Cargo Terminal Alternative
- Nonshipping Alternative: (Retail, Office, Light Industrial Land Uses)

Preparation of this Draft SEIR does not require revisiting the prior alternatives analysis; rather, the purpose of this Draft SEIR is to consider whether the proposed changes to mitigation measures for the Approved Project, when analyzed in the context of projected increases in terminal throughput as discussed in Section 1.4.1, result in new or substantially more severe significant impacts. The modifications to mitigation measures proposed under the Revised Project analyzed in this SEIR do not concern or alter any analysis of or conclusions reached regarding alternatives analyzed in the 2008 EIS/EIR, the comparison of the Approved Project to the alternatives analyzed in the 2008 EIS/EIR, or the identification of the No Federal Action Alternative as the environmentally superior alternative in the 2008 EIS/EIR.

It should be noted that an SEIR is not required to consider alternatives to a component of the project. Rather, the alternatives analysis in the 2008 EIS/EIR appropriately considered alternatives to the project as a whole. The proposed modifications to the mitigation measures in the Revised Project do not change the Approved Project as a whole and do not require that an alternative be developed that specifically addresses those particular modifications.

1.8 Intended Uses of this Draft SEIR

This Draft SEIR has been prepared in accordance with applicable state environmental regulations, policies and laws to inform decision-makers about the potential

environmental impacts of the Revised Project. As an informational document, an SEIR does not recommend approval or denial of a project. The Draft SEIR is being provided to the public for review, comment, and participation in the planning process. After public review and comment, a Final SEIR will be prepared, including responses to comments on the Draft SEIR received from agencies, organizations, and individuals. The Final SEIR will be distributed to provide the basis for decision-making by the CEQA lead agency, as well as other concerned agencies.

1.8.1 Approvals Required by LAHD to Implement the Revised Project

LAHD has jurisdictional authority over the Revised Project primarily pursuant to the Tidelands Trust, California Coastal Act, and the Los Angeles City Charter. The SEIR will be used by LAHD, as the lead agency under CEQA, in making a decision regarding the future operation of the Revised Project and in informing agencies considering permit applications and other actions required to lease and operate the Revised Project. LAHD's certification of the SEIR, Notice of Completion, Findings of Fact, and Statement of Overriding Considerations (if necessary) would document their decision as to the adequacy of the SEIR and inform subsequent decisions by LAHD whether to approve the Revised Project.

The SEIR itself is not a decision document and does not determine whether the Revised Project will be approved. Rather, if changes to existing mitigation measures are recommended as a result of the SEIR, the Board of Harbor Commissioners will consider amending the lease for operations at Berths 97-109 accordingly.

1.8.2 What Happens If the Revised Project Is Not Approved

Construction and operation of the CS Container Terminal was analyzed under the 2008 EIS/EIR. Construction was largely completed by 2013 and operations are ongoing. If the modifications to the operational mitigation measures proposed for the Revised Project are not approved by the Board of Harbor Commissioners, the CS Container Terminal could continue to operate under the terms previously approved for the project studied in the 2008 EIS/EIR.

With respect to the mitigation measures related to transportation that are proposed for modification under the Revised Project, the effect of not approving the Revised Project would mean that LAHD would need to comply with these original mitigation measures, even if facts show that such measures would not reduce a significant environmental impact. This would require LAHD to expend public funds and resources on measures that would not result in a benefit to the community or the environment.

With respect to air quality, if the Board does not approve the Revised Project, the CS Container Terminal could remain in operation under the original mitigation measures for air quality and greenhouse gas emissions. As analyzed in the 2008 EIS/EIR, the impacts remaining after implementation of the previously approved mitigation measures would be less severe than the impacts of the Revised Project. Thus, allowing the previously approved mitigation measures to remain in place would avoid an incremental increase in

severity of impacts caused by the proposed changes. However, the 2008 EIS/EIR determined that these impacts, even with implementation of all mitigation measures, remained significant and unavoidable for the CS Container Terminal project. These impacts remain significant and unavoidable with the application of new mitigation measures; the only difference would be a change in the severity of such impacts.

Consequently, if the Board does not approve the Revised Project, the environmental impacts determined in the 2008 EIS/EIR for the CS Container Terminal would still remain and the previously approved mitigation measures would still be required. LAHD would continue to be responsible for overseeing the Mitigation Monitoring and Reporting Program and ensuring all parties comply with the mitigation measures. This includes the requirement that all mitigation measures and leasing policy requirement be included in leases and lease amendments for operation of the CS Terminal. Consequently, LAHD would still have to adopt or amend the lease with any terminal operator, including China Shipping, to ensure compliance with the mitigation measures. If the previously approved mitigation measures are not implemented as required in the 2008 EIS/EIR, any action by LAHD to enforce such measures would be a separate proceeding outside the scope of this Draft SEIR.

As discussed, LAHD has received information from China Shipping that certain mitigation, as originally adopted, may not be feasibly implemented. This means that retaining the previously approved mitigation measures in the 2008 EIS/EIR may not be consistent with the original project objectives. These objectives are as follows:

(1) provide a portion of the facilities needed to accommodate the projected growth in the volume of containerized cargo through the Port; and

(2) comply with the Mayor's goal for the Port to increase growth while mitigating the impacts of that growth on the local communities and the Los Angeles region by implementing pollution control measures, including the elements of the Clean Air Action Plan (CAAP) applicable to the proposed Project; and

(3) comply with the Port Strategic Plan to maximize the efficiency and capacity of terminals while raising environmental standards through application of all feasible mitigation measures.

The last two objectives may not be met under the previously approved CS Container Terminal project because impacts would remain unaddressed despite the availability of alternative feasible mitigation, as identified in this Draft SEIR. This is a consideration in determining the implications of the Board's action on the Revised Project.

1.9 Key Principles Guiding Preparation of this Draft SEIR

1.9.1 Emphasis on Significant Environmental Effects or Substantial Increase in the Severity of Previously Identified Significant Effects

This Draft SEIR focuses on the significant environmental effects of the Revised Project, including any new significant impacts or substantial increases in the severity of significant impacts identified in the 2008 EIS/EIR, and their relevance to the decision-making process. The following sections describe the general framework for analysis under CEQA. These summaries are not meant to capture the legal nuances that have developed through the passage and amendment of various statutes and regulations, and from corresponding judicial decisions; rather, the summaries are meant to communicate a general understanding of CEQA.

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

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

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

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

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

necessary to determine the significance of the physical impacts of the Revised Project and alternatives.

1.9.2 Forecasting

In this Draft SEIR, the LAHD and its consultants have made their best efforts to predict and evaluate the reasonable, foreseeable, direct, indirect, and cumulative environmental impacts of the Revised Project. CEQA does not require LAHD to engage in speculation about impacts that are not reasonably foreseeable (State CEQA Guideline Sections 15144 and 15145). CEQA does not require a worst-case analysis.

1.9.3 Reliance on Environmental Thresholds and Substantial Evidence

The identification of impacts as "significant" or "less than significant" is one of the important functions of an EIR. While impacts determined to be "less than significant" need only be acknowledged as such, an EIR must identify mitigation measures for any impact identified as "significant." In preparing this document, LAHD has based its conclusions about the significance of environmental impacts on identifiable thresholds and has supported these conclusions with substantial scientific evidence.

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

1.9.4 Reliance on Current Data, Models, and Analytical Tools

In preparing this Draft SEIR, LAHD has used the most current data available to to determine the 2014 baseline and future condition assumptions. In addition, substantial advances in air quality, health risk, and traffic modeling and other analytical tools have occurred since the 2008 EIS/EIR was prepared. The new models and analytical tools were used in the preparation of this document in order to ensure an accurate and up-to-date assessment of the impacts of the Revised Project. Furthermore, as described in more detail in Section 2.5, many of the models and analytical tools used in the previous analysis are no longer available or are no longer approved for use by the relevant resource agencies.

1.9.5 Disagreement Among Experts

During preparation of the Draft SEIR, it is possible that evidence that might raise disagreements will be presented during the public review of the Draft SEIR. Such disagreements will be noted and will be considered by the decision-makers during the

public hearing process. However, to be adequate under CEQA, the Draft SEIR need not resolve all such disagreements (State CEQA Guidelines Section 15151).

Accordingly, conflict of evidence and expert opinions on an issue concerning the environmental impacts of the Revised Project—when LAHD is aware of these controversies—has been identified in this Draft SEIR. The Draft SEIR has summarized the conflicting opinions, where they occur, and has included sufficient information to allow the public and decision-makers to take intelligent account of the environmental consequences of their actions.

In rendering a decision on a project where there is a disagreement exists among experts, the decision-makers are not obligated to select the most conservative, environmentally protective or liberal viewpoint. Decision-makers might give more weight to the views of one expert than to those of another, and need not resolve a dispute among experts. The decision-makers must consider the comments received and address any objections, but need not follow said comments or objections so long as the decision-makers state the basis for their decision and the decision is supported by substantial evidence.

1.9.6 Duty to Mitigate

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

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

Section 15041 of the State CEQA Guidelines grants public agencies the authority to require feasible changes (mitigation) that would substantially lessen or avoid a significant effect on the environment associated with activities involved in a project. Public agencies, however, do not have unlimited authority to impose mitigation. A public agency might exercise only those express or implied powers provided by law, aside from those provided by CEQA. However, where another law grants discretionary powers to a public agency, CEQA authorizes use of discretionary powers (State CEQA Guidelines Section 15040).

In addition to limitations imposed by CEQA, the U.S. Constitution limits the authority of regulatory agencies to impose conditions to those situations where a clear and direct connection ("nexus," in legal terms) exists between a project impact and the mitigation measure. Finally, a proportional balance must exist between the impact caused by the project and the mitigation measure imposed upon the project applicant. A project

applicant cannot be forced to pay more than its fair share of the mitigation, which should be roughly proportional to the impact(s) caused by the project.

1.9.7 Incorporation by Reference

CEQA encourages incorporation by reference (State CEQA Guidelines Section 15006(t)) and establishes guidelines for incorporation by reference (State CEQA Guidelines Section 15150). Specifically, Section 15150 states, "Where an EIR or Negative Declaration uses incorporation by reference, the incorporated part of the referenced document shall be briefly summarized where possible or briefly described if the data or information cannot be summarized. The relationship between the incorporated part of the referenced document and the EIR shall be described". In addition, a supplemental EIR may be circulated by itself without recirculating the previous EIR (in this case, the 2008 EIS/EIR), and the decision-making body is to consider the previous EIR as revised by the SEIR (State CEQA Guidelines Sections 15163(D) and (e)).

This Draft SEIR incorporates the 2008 EIS/EIR for the Approved Project (USACE and LAHD, 2008) by reference. The key findings of the 2008 EIS/EIR and its relationship to this document are summarized in Section 2.2 of this SEIR.

1.10 Port of Los Angeles Environmental Initiatives

LAHD's Environmental Management Policy, as described in this section, was approved by the Harbor Commission on April 27, 2003. The purpose of the Environmental Management Policy is to provide an introspective, organized approach to environmental management; further incorporate environmental considerations into day-to-day Port operations; and achieve continual environmental improvement.

The Environmental Management Policy includes existing environmental initiatives for LAHD and its customers, such as the voluntary Vessel Speed Reduction Program (VSRP), Source Control Program, Clean Air Action Plan, Clean Truck Program, and the Clean Engines and Fuels Policy. These programs, as well as a number of others, are Port-wide initiatives to reduce environmental pollution. Many of the programs relate to the Revised Project, and the following discussion includes details on those programs and their goals. Numerous other Port programs and plans related to wildlife and natural resources, water and sediment quality, and cultural resource protection are not summarized here because they are not directly relevant to the Revised Project, but they can be reviewed at https://www.portoflosangeles.org/idx_environment.asp.

1.10.1 LAHD's Environmental Policy

LAHD is committed to managing resources and conducting Port developments and operations in an environmentally and fiscally responsible manner. LAHD strives to improve the quality of life and minimize the impacts of its development and operations on the environment and surrounding communities. This is done through the continuous improvement of its environmental performance and the implementation of

pollution-prevention measures, in a feasible and cost-effective manner that is consistent with LAHD's overall mission and goals and with those of its customers and the community.

To ensure this policy is successfully implemented, LAHD will develop and maintain an environmental management program that will:

- ensure that environmental policy is communicated to LAHD staff, its customers, and the community;
- ensure compliance with all applicable environmental laws and regulations;
- ensure that environmental considerations include feasible and cost-effective options for exceeding applicable regulatory requirements;
- define and establish environmental objectives, targets, and best management practices (BMPs), and monitor performance;
- ensure LAHD maintains a Customer Outreach Program to address common environmental issues; and
- fulfill the responsibilities of each generation as trustee of the environment for succeeding generations through environmental awareness and communication with employees, customers, regulatory agencies, and neighboring communities.
- LAHD is committed to the spirit and intent of this policy and the laws, rules, and regulations, which give it foundation.

1.10.2 Environmental Plans and Programs

LAHD has implemented a variety of plans and programs to reduce the environmental effects associated with operations at the Port. These programs include the San Pedro Bay Port Complex Clean Air Action Plan (CAAP), Water Resources Action Plan (WRAP), deepening the channels of the Port to accommodate larger and more efficient ships, and converting to electric and alternative-fuel vehicles. All of these efforts ultimately reduce adverse environmental effects.

1.10.2.1 Clean Air Action Plan

The Ports of Los Angeles and Long Beach, with the participation and cooperation of the staff of the EPA, CARB, and SCAQMD, prepared the San Pedro Bay Port Complex CAAP, a planning and policy document that sets goals and implementation strategies to reduce air emissions and health risks associated with Port operations while allowing Port development to continue. In addition, the CAAP sought the reduction of criteria pollutant emissions to the levels that assure Port-related sources decrease their "fair share" of regional emissions to enable the South Coast Air Basin to attain state and federal ambient air quality standards. Each individual CAAP measure is a proposed strategy for achieving these emissions reductions goals. The Ports approved the first CAAP in November 2006. Specific strategies to significantly reduce the health risks posed by air pollution from Port-related sources include:

- aggressive milestones with measurable goals for air quality improvements;
- specific goals set forth as standards for individual source categories to act as a guide for decision-making;
- recommendations to eliminate emissions of ultrafine particulates;

- technology advancement programs to reduce greenhouse gases; and
- public participation processes with environmental organizations and the business communities.

The CAAP focuses primarily on reducing diesel particulate matter (DPM), along with nitrogen oxide (NO_x) and sulfur oxides (SO_x). Reducing emissions, and therefore health risk, allows for future Port growth while progressively controlling the impacts associated with growth. The CAAP includes emission control measures as proposed strategies that are designed to further these goals. The goals are expressed as Source-Specific Performance Standards that may be implemented through the environmental review process or could be included in new leases or Port-wide tariffs, Memoranda of Understanding (MOU), voluntary action, grants, or incentive programs.

The CAAP Update, adopted in November 2010, includes updated and new emission control measures as proposed strategies that support the goals expressed as the Source-Specific Performance Standards and the Project-Specific Standards. In addition, the CAAP Update includes the recently developed San Pedro Bay Standards, which establish emission and health risk reduction goals to assist the Ports in their planning for adopting and implementing strategies to significantly reduce the effects of cumulative Port-related operations.

The goals set forth as the San Pedro Bay Standards are the most significant addition to the CAAP and include both a Bay-wide health risk reduction standard and a Bay-wide mass emission reduction standard. Ongoing Port-wide CAAP progress and effectiveness are measured against these Bay-wide Standards, which consist of the following reductions as compared to 2005 emissions levels:

- Health Risk Reduction Standard: 85% reduction in DPM by 2020
- Emission Reduction Standards:
- By 2014, reduce emissions by 72% for DPM, 22% for NO_x, and 93% for SO_x
- By 2023, reduce emissions by 77% for DPM, 59% for NO_x, and 92% for SO_x.

The Project-Specific Standard remains as adopted in the original CAAP in 2006, that new projects meet the 10 in 1,000,000 excess residential cancer risk threshold, as determined by health risk assessments conducted in accordance with CEQA statutes, regulations, and guidelines, and implemented through required CEQA mitigations and/or lease negotiations. Although each Port has adopted the Project-Specific Standard as a policy, the Board of Harbor Commissioners retain the discretion to consider and approve projects that exceed this threshold if the Board deems it necessary by adoption of a statement of overriding considerations at the time of project approval.

This Draft SEIR analysis assumes compliance with the CAAP in its current form, as updated in 2010. Proposed project specific mitigation measures applied to reduce air emissions and public health impacts are consistent with, and in some cases exceed, the emission-reduction strategies of the 2010 CAAP.

In 2016, the Ports began the process of updating the CAAP to produce the third version. The scope and framework of this CAAP 3.0 Update will continue to look at the five major mobile sources of air pollution in and around the ports, while placing new Bay-wide Standards for the future. In addition, the CAAP will be expanded to address the following:

- Zero-emissions technologies
- Greenhouse gas emissions reductions
- Energy strategies
- Supply chain optimization.

Zero Emission Equipment: While the CAAP has been very successful at encouraging substantial emissions reductions, further reductions may be needed as Port throughput continues to increase in the coming years. Promising developments in the area of zero and near-zero emissions technology may mean that zero-emissions equipment capable of handling the demands of the heavy use requirements of a marine terminal may be forthcoming in the near future.

In 2011, the Port of Los Angeles and the Port of Long Beach released a Zero Emission Technologies Roadmap to establish an initial plan for identifying technologies to pursue demonstrations to advance zero emission technology development. In September 2015 the LAHD released a draft Zero Emission White Paper (White Paper) that was developed to assist LAHD in moving toward the adoption of zero emission technologies for local goods movement. The White Paper contains information on various types of zero emission and near-zero-emission technologies, the status of those technologies (as of September 2015), proposed testing plans for future demonstrations, infrastructure planning, and a business case study. The paper concluded with a series of specific recommendations, which were designed to guide the LAHD in its decisions regarding the advancement of technology in and around the Port towards zero-emission and near-zero-emissions.

The LAHD has provided over $7 million in funding for projects aimed at developing zero emission technology for short-haul drayage trucks and on-terminal yard tractors. Initial zero emission vehicle testing has shown mixed results, but more recent progress has been made that reinforces the LAHD's belief that zero emission container movement technologies show great promise for helping to reduce criteria pollutants and greenhouse gas emissions in the future.

The Port of Los Angeles, working collaboratively with the Port of Long Beach and several stakeholders and partnerships, is committed to expanded development and testing of zero emission technologies, identification of new strategic funding opportunities to support these expanded activities, and new planning for long-term infrastructure development to sustain developed programs, all while ensuring competitiveness among maritime goods movement businesses.

1.10.2.2 Other Environmental Programs

Air Quality

Alternative Maritime Power (AMP): AMP reduces emissions from container vessels docked at the Port. As described in Section 1.2, ships normally shut off their propulsion engines when at berth but use auxiliary diesel generators to power electrical needs such as lights, pumps, and refrigerator units. These generators emit an array of pollutants, primarily NO_x, SO_x, and particulate matter (PM_{10} and $PM_{2.5}$). The Port provides shore-based electricity at 24 of its berths as an alternative to running the generators. The AMP program allows ships to "plug-in" to shoreside electrical power while at dock instead of

using on-board generators (a practice also referred to as cold ironing), which dramatically reduces emissions. AMP facilities have been installed and are currently in use at APM Terminals, Eagle Marine Services, the CS Terminal, Yusen Terminal, Everport Terminal, TraPac Terminal, Yang Ming Terminal, and the Cruise Ship Terminal. AMP has been incorporated into the CAAP as a project-specific measure.

Off-Peak Program: Extending cargo terminal operations by five night and weekend work shifts, the Off-Peak Program, managed by PierPASS (an organization created by marine terminal operators) has been successful in increasing cargo movement, reducing the waiting time for trucks inside Port terminals, and reducing truck traffic during peak daytime commuting periods.

On-Dock Rail and the Alameda Corridor: Use of rail for long-haul cargo is acknowledged as an air quality benefit. Five existing on-dock railyards at the Port, including the WBICTF used by the CS Container Terminal (Figure 1-3), significantly reduce the number of short-distance truck trips (the trips that normally would convey containers to and from off-site railyards

The Alameda Corridor, a joint undertaking of the two San Pedro Bay ports, allows trains to and from the on-dock railyards to connect directly to the nationwide rail network, starting near downtown Los Angeles. The corridor is fully grade-separated, meaning that train traffic does not conflict with roadway traffic and can travel at higher speeds than previously. Use of the Alameda Corridor allows more cargo to travel by rail, thereby reducing emissions compared to truck travel, and reduces vehicle emissions caused by delay at grade crossings.

Electric and Alternative Fuel Vehicles: The Port has converted more than 35% of its fleet to electric or alternative-fuel vehicles. These include heavy-duty vehicles and passenger vehicles. In addition, through its Technology Advancement Program, its participation in zero-emissions technology projects, and other initiatives the Port has provided funding and staff support for pilot and demonstration programs related to electric and hybrid heavy-duty trucks. These initiatives are part of the Port's efforts to reduce emissions in the goods movement industry.

Electrified Terminal Operating Equipment: The 85 ship-loading cranes currently in use at the Port operate under electric power. In addition, a variety of other terminal operations equipment has been fitted with electric motors.

Yard Equipment: Over the past ten years, diesel oxidation catalysts have been applied to nearly all yard tractors at the Port. This program has been carried out with Port funds and funding from the Carl Moyer Program. The Port has also participated in projects to demonstrate zero-emissions and hybrid cargo-handling equipment and yard tractors,. Projects include providing funding for an Eco-Crane (diesel-electric RTG) demonstration, supporting a CARB demonstration project at the APM Terminal involving electric yard tractors, and participating in a recent CEC grant program at the Everport Terminal that converted 20 yard tractors to LNG.

Vessel Speed Reduction Program: Under this voluntary program, oceangoing vessels slow to 12 knots when within 20 and 40 nautical miles of the entrance to Los Angeles Harbor, thus reducing emissions from main propulsion engines. Currently, approximately 94% of ships comply with the voluntary program within 20 nautical miles and 79% comply within 40 nautical miles.

Greenhouse Gas Reduction: Under a December 2007 agreement with the Attorney General's office, the Port conducts annual comprehensive inventories of Port-related greenhouse gas emissions, tracking these emissions from their foreign sources to domestic distribution points throughout the United States. The Port reports this data annually to the California Climate Action Registry. The annual reports include emissions of all ships bound to and from the Port terminals, encompassing points of origin and destination; emissions of all rail transit to and from Port terminals, encompassing major rail cargo destination and distribution points in the United States; and emissions of all truck transit to and from Port terminals, encompassing major truck destinations and distribution points.

The Port-wide inventory will be conducted annually until the CARB regulations on greenhouse gas monitoring and reporting mandated by Assembly Bill (AB) 32 become effective. Under the agreement, LAHD is also constructing a 10-megawatt photovoltaic solar system to offset approximately 17,000 metric tons of carbon dioxide equivalent annually.

In addition to the agreement with the Attorney General, many of the environmental programs described in this section (such as the Green Terminal Program, the Recycling Program, the Green Ports Program, and all of the air quality improvement programs described above) serve to reduce greenhouse gas emissions.

General Port Environmental Programs

Green Building Policy: In August 2007, LAHD adopted a Green Building Policy, which outlines the environmental goals for newly constructed and existing buildings, dictates the incorporation of solar power and technologies that are efficient with respect to the use of energy and water, dedicates staffing for the advancement and refinement of sustainable building practices, and maintains communication with other City of Los Angeles departments for the benefit of the community. The policy incorporates sustainable building design and construction guidelines based on the United States Green Building Council – Leadership in Energy and Environmental Design Green Building Rating System (POLA, 2007).

Recycling: The Port incorporates a variety of innovative environmental programs and concepts into its construction projects and administrative and maintenance activities. For example, when building an on-dock rail facility, the Port saved nearly $1,000,000 and thousands of cubic yards of landfill space by recycling existing asphalt pavement instead of purchasing new pavement. The Port also maintains an annual contract to crush and recycle broken concrete and asphalt. In addition, the Port successfully has used recycled plastic products, such as fender piles and protective front-row piles, in many wharf construction projects. Ongoing Port initiatives include recycling and waste diversion programs targeting office activities (e.g., paper, cardboard, and toner cartridge recycling/reduction), vehicle maintenance waste minimization and recycling (e.g., tires and motor oil), metal and wood reclamation/waste diversion (construction and maintenance activities); and green waste recycling.

1.11 Availability of the SEIR

The Draft SEIR for the Revised Project is being distributed directly to agencies, organizations, and interested groups and persons for comment during the formal review period in accordance with Section 15087 of the State CEQA Guidelines. A 45-day comment period has been established, which begins on June 16, 2017, and ends on July 31, 2017, during which the Draft SEIR is available for general public review at the following locations:

LAHD Environmental Management Division
222 West Sixth Street, 9th Floor
San Pedro, California 90731

Los Angeles Public Library Central Branch
630 West 5th Street
Los Angeles, California 90071

Los Angeles Public Library San Pedro Branch
921 South Gaffey Street
San Pedro, California 90731

Los Angeles Public Library Wilmington Branch
1300 North Avalon Boulevard
Wilmington, California 90744

In addition to printed copies, electronic versions of the Draft SEIR are available as a series of PDF files to facilitate downloading and printing. Members of the public can request a CD containing this document. The Draft SEIR is available in its entirety as PDF files on the Port of Los Angeles website at: http://www.portoflosangeles.org/environment/public_notices.asp.

Interested parties may provide written comments on the Draft SEIR, which must be postmarked by July 31, 2017. Please address comments to:

Christopher Cannon, Director
Environmental Management Division
Los Angeles Harbor Department
425 S. Palos Verdes Street
San Pedro, CA 90731

Comments may also be sent via email to ceqacomments@portla.org.

CEQA allows that a supplement to an EIR may be circulated for public review by itself without recirculating the previous draft or final EIR. LAHD will make available the 2008 EIS/EIR during the review of the Draft SEIR on the Port of Los Angeles website at: http://www.portoflosangeles.org/environment/public_notices.asp or in hard copy at the Environmental Management Division.