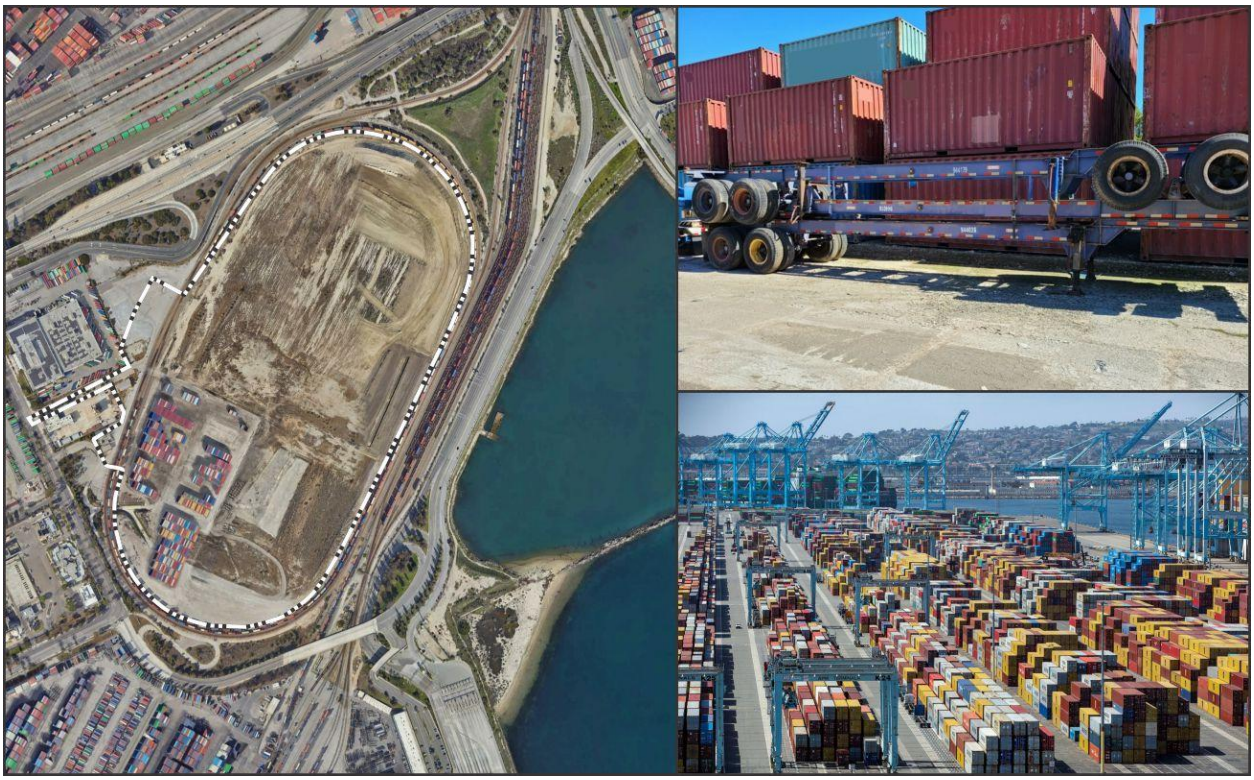
Final Environmental Impact Report

Terminal Island Maritime Support Facility Project

APP# 230131-011
SCH# 2023120181



May 2026

Prepared by

Aspen environmental group

5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301
(818) 597-3407

THE PORT OF LOS ANGELES

TRANSMITTAL 1

Contents

Acronyms/Abbreviations ..... **vi**

Executive Summary **ES-1**

ES.1 Introduction ES-1
ES.2 Purpose of the EIR ES-1
ES.2.1. CEQA Analysis Overview ES-2
ES.2.2. Project Objectives ES-3
ES.2.3. CEQA Baseline ES-3
ES.3 Proposed Project ES-3
ES.3.1. Overview ES-3
ES.3.2. Project Construction ES-4
ES.3.3. Project Operation ES-5
ES.4 Alternatives ES-5
ES.4.1. Alternative 1 – No Project Alternative ES-5
ES.4.2. Alternative 2 – Reduced Project Alternative ES-5
ES.4.3. Alternatives Considered But Not Further Evaluated ES-5
ES.4.4. Environmentally Superior Alternative ES-6
ES.5 Environmental Impacts ES-6
ES.5.1. Impacts Not Considered in this EIR ES-7
ES.5.2. Impacts of the Proposed Project and Alternatives ES-7
ES.6 Public Involvement ES-13
ES.7 Areas of Controversy ES-14
ES.8 Issues to be Resolved ES-14

Chapter 1 Introduction **1-1**

1.1 Introduction 1-1
1.2 Background 1-1
1.2.1. Project Location 1-1
1.2.2. Project Overview 1-2
1.3 CEQA and the Purpose of an EIR 1-3
1.4 Scope and Content of the EIR 1-4
1.4.1. Scope of Analysis 1-4
1.4.2. Scoping Comments 1-5
1.4.3. Intended Uses of this EIR 1-5
1.4.4. EIR Organization 1-6
1.5 Key Principles Guiding Preparation of this EIR 1-7
1.5.1. Forecasting 1-7
1.5.2. Reliance on Environmental Thresholds and Substantial Evidence 1-7
1.5.3. Disagreement Among Experts 1-8
1.5.4. CEQA Baseline 1-8
1.5.5. Duty to Mitigate 1-8
1.5.6. Requirements to Evaluate Alternatives 1-9

1.6 Alternatives 1-10
1.6.1. Alternatives Evaluated in this EIR 1-10
1.6.2. Alternatives Considered But Not Further Evaluated 1-13
1.7 Availability of the Draft EIR and Partially Revised and Recirculated Draft EIR 1-13
Chapter 2 Project Description 2-1
2.1 Introduction 2-1
2.2 Background and Project Overview 2-1
2.2.1. Background 2-1
2.2.2. Project Overview 2-2
2.3 Project Objectives 2-2
2.4 Project Location and Setting 2-3
2.4.1. Regional Setting 2-3
2.4.2. Project Site and Surrounding Uses 2-3
2.5 Project Description 2-7
2.5.1. Overview 2-7
2.5.2. Construction 2-9
2.5.3. Operation 2-11
2.6 CEQA Baseline 2-12
2.7 Lead, Responsible, and Trustee Agencies 2-13
Chapter 3 Environmental Analysis 3-1
Introduction 3-1
Terminology Used in This Environmental Analysis 3-2
Requirement to Evaluate Alternatives 3-2
3.1 Air Quality and Health Risk 3.1-1
3.1.1. Introduction 3.1-2
3.1.2. Environmental Setting 3.1-2
3.1.3. Applicable Regulations 3.1-5
3.1.4. Impacts and Mitigation Measures 3.1-12
3.1.5. Impact Analysis 3.1-16
3.1.6. Significant Unavoidable Impacts 3.1-34
3.2 Energy 3.2-1
3.2.1. Introduction 3.2-2
3.2.2. Environmental Setting 3.2-2
3.2.3. Applicable Regulations 3.2-3
3.2.4. Impacts and Mitigation Measures 3.2-4
3.2.5. Impact Analysis 3.2-6
3.2.6. Significant Unavoidable Impacts 3.2-11
3.3 Greenhouse Gas Emissions 3.3-1
3.3.1. Introduction 3.3-2
3.3.2. Environmental Setting 3.3-2
3.3.3. Applicable Regulations 3.3-3
3.3.4. Impacts and Mitigation Measures 3.3-6
3.3.5. Impact Analysis 3.3-10

3.3.6. Sea Level Rise 3.3-24
3.3.7. Significant Unavoidable Impacts 3.3-25

3.4 Hazards and Hazardous Materials 3.4-1
3.4.1. Introduction 3.4-2
3.4.2. Environmental Setting 3.4-2
3.4.3. Applicable Regulations 3.4-11
3.4.4. Impacts and Mitigation Measures 3.4-16
3.4.5. Impact Analysis 3.4-17
3.4.6. Significant Unavoidable Impacts 3.4-26

Chapter 4 Cumulative Analysis 4-1

4.1 Introduction 4-2
4.1.1. Requirements for Cumulative Impact Analysis 4-2
4.1.2. Projects Considered in the Cumulative Analysis 4-3

4.2 Cumulative Impact Analysis 4-9
4.2.1. Air Quality and Health Risk 4-11
4.2.2. Energy 4-18
4.2.3. Greenhouse Gas Emissions 4-20
4.2.4. Hazards and Hazardous Materials 4-23

4.3 Summary of Cumulatively Considerable Impacts 4-25
4.3.1. Proposed Project 4-26
4.3.2. Alternative 1 – No Project Alternative 4-26
4.3.3. Alternative 2 – Reduced Project Alternative 4-26

Chapter 5 Comparison of Alternatives 5-1

5.1 Introduction 5-1
5.2 Project Alternatives 5-1
5.2.1. Alternative 1 – No Project Alternative 5-2
5.2.2. Alternative 2 – Reduced Project Alternative 5-2
5.2.3. Alternatives Considered But Not Further Evaluated 5-3

5.3 Alternatives Comparison 5-4
5.3.1. CEQA Alternatives Comparison 5-4
5.3.2. Environmentally Superior Alternative 5-6

Chapter 6 Significant Irreversible Changes 6-1

6.1 Introduction 6-1
6.2 Analysis of Irreversible Changes 6-1

Chapter 7 Growth-Inducing Impacts 7-1

7.1 Introduction 7-1
7.2 Summary of Growth-Inducing Impacts 7-1
7.2.1. Direct Growth-Inducing Impacts 7-2
7.2.2. Indirect Growth-Inducing Impacts 7-2

Chapter 8 List of Preparers and Contributors 8-1

Los Angeles Harbor Department 8-1
Aspen Environmental Group 8-1
Aspen Team Subcontractors 8-2

Chapter 9 References 9-1

Chapter 10 Responses to Comments 10-1

10.1. Distribution of the Draft EIR and Partially Revised and Recirculated Draft EIR 10-1
10.2. Responses to Comments 10-2
10.3. State, Regional, and Local Governments 10-4
10.4. Organizations 10-44

Tables

Table ES-1: Summary of Impacts and Mitigation for the Proposed Project and Alternatives ES-7
Table 1-1: Summary of Key Scoping Comments 1-5
Table 1-2: Organization and Contents of the EIR 1-6
Table 1-3: Summary of Proposed Project and Alternatives at Full Buildout 1-11
Table 2-1: Agencies That May Use This EIR 2-13
Table 3.1-1: SCAQMD Regional Thresholds for Construction Emissions 3.1-14
Table 3.1-2: SCAQMD LST for Construction Emissions (lbs/day) 3.1-14
Table 3.1-3: SCAQMD Regional Thresholds for Operational Emissions 3.1-15
Table 3.1-4: SCAQMD LST for Operational Emissions (lbs/day) 3.1-15
Table 3.1-5: Maximum Daily Unmitigated Construction Emissions, Regional Thresholds 3.1-17
Table 3.1-6: Maximum Daily Unmitigated Construction Emissions, Localized Thresholds 3.1-18
Table 3.1-7: Maximum Daily Unmitigated Operation Emissions, Regional Thresholds 3.1-19
Table 3.1-8: Maximum Daily Unmitigated Operation Emissions, Localized Thresholds 3.1-22
Table 3.1-9: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality 3.1-32
Table 3.2-1: Energy Sources of Electricity Supplied to Customers (Power Content) 3.2-3
Table 3.2-2: Summary Matrix of Potential Impacts and Mitigation Measures for Energy 3.2-9
Table 3.3-1: Proposed Project Annual GHG Emissions 3.3-11
Table 3.3-2: Proposed Project Annual GHG Emissions in Opening Year and Full Buildout Year 3.3-12
Table 3.3-3: Proposed Project with Mitigation for GHG Reduction Offsets 3.3-15
Table 3.3-4: Applicable GHG Emissions Reduction Strategies 3.3-16
Table 3.3-5: Summary Matrix of Potential Impacts and Mitigation Measures for GHG Emissions 3.3-20
Table 3.4-1: Summary Matrix of Potential Impacts and Mitigation Measures for Hazards and Hazardous Materials 3.4-24
Table 4-1: Related and Cumulative Projects 4-4
Table 4-2: Summary Matrix of Residual Impacts, Cumulative Analysis, and Mitigation Measures for the Proposed Project and Alternative 2 4-27
Table 5-1: Summary of Proposed Project and Alternatives at Full Buildout (Year 2049) 5-2
Table 5-2: Summary of Impacts 5-5
Table 10-1: Public Comments Received on the Draft EIR 10-1

Figures

Figure ES-1. Proposed Project Site ES-2
Figure 1-1. Reduced Project Alternative (Alternative 2) Boundary and Existing PMP Land Use Designations – REVISED 1-12
Figure 2-1. Regional Location of the Proposed Project 2-4
Figure 2-2. Existing PMP Land Use Designations on the Project Site 2-6
Figure 2-3. Project Site Plan 2-8
Figure 4-1. Locations of Related and Cumulative Projects – REVISED 4-3

Appendices

Appendix A: Notice of Preparation/Initial Study and Scoping Comments
Appendix B1: Air Quality and Greenhouse Gas Calculations
Appendix B2: Health Risk Assessment
Appendix C: California Coastal Act Consistency Analysis
Appendix D: Soil Management Plan

Acronyms/Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AF	DTSC-approved Attenuation Factor
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ARSSS	Anchorage Road Soil Storage Site
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
BGS	Below Ground Surface
BMPs	Best Management Practices
CAA	Clean Air Act
CAAP	Clean Air Action Plan
CAAQS	California Ambient Air Quality Standards
Cal EPA	California Environmental Protection Agency
Cal/OSHA	California Occupational Safety and Health Administration
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCC	California Coastal Commission
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERP	Community Emissions Reduction Plan
CH_4	Methane
CHHSL	California Human Health Screening Levels
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide-Equivalents
CSC	Community Steering Committee
CTP	Clean Truck Program
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CY	Cubic Yards

Acronym/Abbreviation	Definition
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
EDR	Environmental Data Resources
EIR	Environmental Impact Report
ESLs	Environmental Screening Levels
FMS	Fenix Marine Services
FUDS	Formerly Used Defense Sites
GHG	Greenhouse Gas
HDT	Heavy Duty Trucks
HMBP	Hazardous Materials Business Plan
HRA	Health Risk Assessment
IWMB	Integrated Waste Management Board
kg	Kilogram or 1,000 grams
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAHD	Los Angeles Harbor Department
LAMC	City of Los Angeles Municipal Code
LARWQCB	Los Angeles Regional Water Quality Control Board
LID	Low-Impact Development
LST	Localized Significance Threshold
LTS	Less-Than-Significant Impacts
LTS-M	Less-Than-Significant Impacts with Incorporation of Mitigation Measures
LUST	Leaking Underground Storage Tank
M&R	Maintenance and Repair
MD	Munitions Debris
MEC	Munitions and Explosives of Concern
mg	Milligram or One Thousandth of a Gram
µg	Microgram or One Millionth of a Gram
MM	Mitigation Measure
MMT	Million Metric Ton
MND	Mitigated Negative Declaration
MOTEMS	Marine Oil Terminal Engineering and Maintenance Standards
MSF	Marine Support Facility
MT	Metric Ton

Acronym/Abbreviation	Definition
NAAQS	National Ambient Air Quality Standard
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_2	Nitrogen Dioxide
NOP	Notice of Preparation
NOP/IS	Notice of Preparation/Initial Study
NOx	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazard Assessment
PAH	Polycyclic Aromatic Hydrocarbon
PCB	Polychlorinated biphenyls
PCH	Pacific Coast Highway
PDTRT	Ports' Drayage Truck Registry
PERP	Portable Equipment Registration Program
PF	Project Feature
PM10	Respirable Particulate Matter with an Aerodynamic Diameter of 10 Micrometers or Less
PM2.5	Fine Particulate Matter with an Aerodynamic Diameter of 2.5 Micrometers or Less
PMP	Port Master Plan
POLA	Port of Los Angeles
POLB	Port of Long Beach
Ppm	Parts Per Million
RAST	Risk Assessment Standalone Tool
RCP	Reinforced Concrete Pipe
RCRA	Resource Conservation and Recovery Act
RFID	Radio Frequency Identification
RMP	Risk Management Plan
ROG	Reactive Organic Gases
RPS	Renewables Portfolio Standard
RSLs	Regional Screening Levels
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SDS	Safety Data Sheets
SF_6	Sulfur Hexafluoride

Acronym/Abbreviation	Definition
SLR	Sea Level Rise
SLTRP	Strategic Long-term Resource Plan
SMP	Soil Management Plan
SO_2	Sulfur Dioxide
SOx	Sulfur Oxides
SPBP	San Pedro Bay Ports
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Route
SVOC	Semi-Volatile Organic Compound
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TFH	Total Fuel Hydrocarbons
TPH	Total Petroleum Hydrocarbons
TSCA	Toxic Substances Control Act
USACE	U.S. Army Corps of Engineers
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
UTR	Utility Tractor Rig
UXO	Unexploded Ordnance
VIMS	Vapor Intrusion Mitigation System
VOC	Volatile Organic Compounds
WRAP	Water Resources Action Plan

Executive Summary

ES.1 Introduction

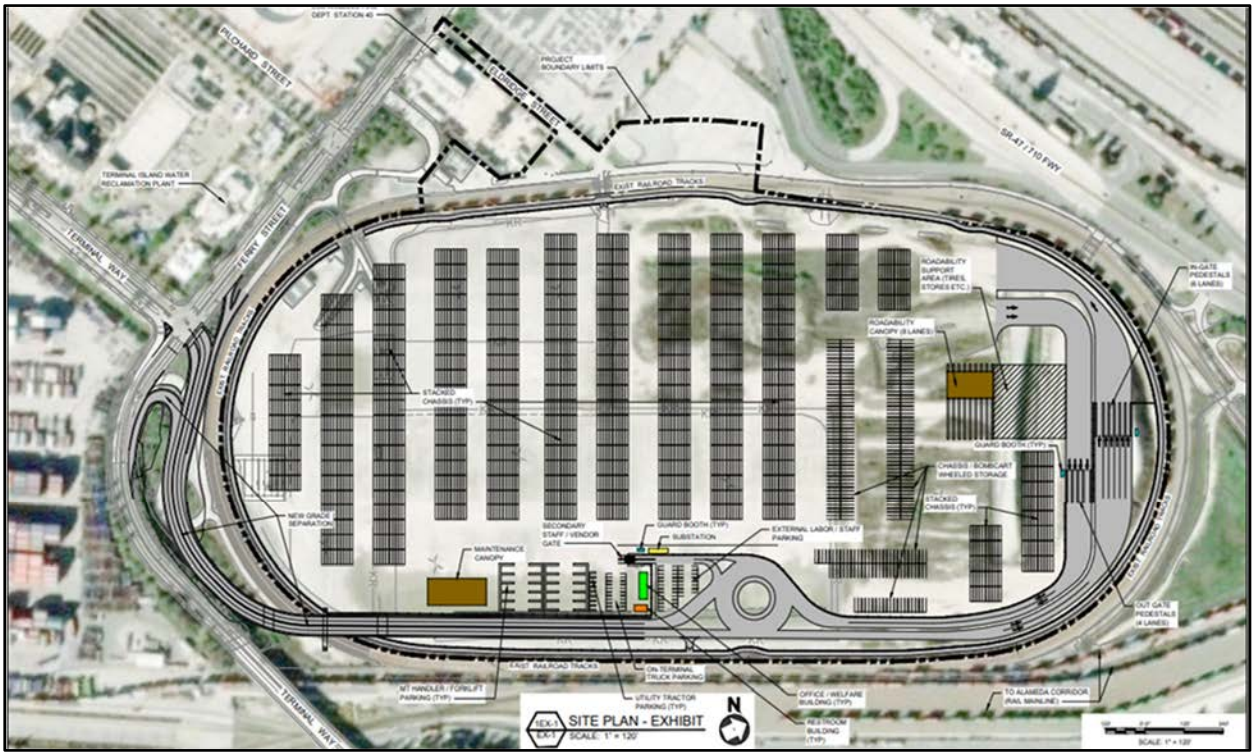
This Final Environmental Impact Report (EIR) has been prepared by the Los Angeles Harbor Department (LAHD) to evaluate environmental impacts related to the construction and operation of the Terminal Island Maritime Support Facility (MSF) (MSF Project or "Proposed Project"). The Project site (Figure ES-1) occupies approximately 89.2 acres, including approximately ~~73~~ 71 acres of usable space within "the loop" at 740 Terminal Way, San Pedro at the Port of Los Angeles (Port or POLA). LAHD proposes to construct and operate a chassis support and/or empty wheeled container storage facility, including office/welfare buildings, canopy structures, restrooms, guard booths, Maintenance and Repair (M&R) facilities, chassis stalls (i.e., parking spaces), and appurtenant water and electrical infrastructure, that would allow for additional chassis and empty wheeled container storage and increased efficiency on-terminal. This EIR has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) and the Guidelines for Implementation of the California Environmental Quality Act of 1970 (State CEQA Guidelines). Specifically, this Executive Summary has been prepared in accordance with Section 15123(b) of the State CEQA Guidelines, which states that the EIR should contain a brief summary of the proposed actions and their consequences and should identify: (1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) areas of controversy known to the lead agency; and (3) issues to be resolved including the choice among alternatives and whether or how to mitigate significant effects. Throughout the Executive Summary are references to various chapters and sections in the EIR where detailed information and analyses can be reviewed.

ES.2 Purpose of the EIR

The EIR will be used to inform decision-makers and the public about the potential significant environmental effects of the Proposed Project and alternatives. The Draft EIR ~~is also~~was provided to the public for review, comment, and participation in the planning process from September 15 to October 30, 2025. After public review and comment, a Partially Revised and Recirculated Draft EIR was prepared to address commenter concerns regarding the methodologies used in the Draft EIR to calculate potential Project emissions. This Partially Revised and Recirculated Draft EIR was also provided to the public for review from January 26 to March 11, 2026. Accordingly, this Final EIR ~~will be~~was prepared ~~that will~~ includinge responses to comments on the Draft EIR and Partially Revised and Recirculated Draft EIR received from agencies, organizations, and individuals. Thise Final EIR ~~will~~ provides the basis for decision-making by the CEQA lead agency, as described below. Thise Final EIR ~~will then~~ provides the basis for

decision-making by the LAHD. Several other agencies (federal, State, regional, and local) have jurisdiction over some part of the Proposed Project, or a resource area affected by the Proposed Project and are expected to utilize this Final EIR as part of their approval or permit processes.

Figure ES-1. Proposed Project Site



ES.2.1. CEQA Analysis Overview

The LAHD operates the Port under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Section 601; California Tidelands Trust Act of 1911) and the California Coastal Act (PRC Division 20 Sections 30700 et seq.). The LAHD is chartered to develop and operate the Port to benefit maritime uses, and it functions as a landlord by leasing Port properties to more than 300 tenants. The actions under consideration by LAHD involve physical changes to the environment that would have potentially significant impacts, as determined in the Notice of Preparation/Initial Study (NOP/IS) for the Proposed Project (Final EIR Appendix A). Accordingly, an EIR is required. This EIR evaluates the direct, indirect, and cumulative impacts of the Proposed Project in accordance with the provisions set forth in the State CEQA Guidelines. It will be used to address potentially significant environmental issues. The primary intended uses of this EIR by LAHD are (1) to inform agencies considering permit applications and other actions required to construct, lease, and operate the selected alternative; (2) to inform the public of the potential environmental consequences of the Proposed Project and alternatives; and (3) to adopt mitigation measures that, where possible, will reduce or eliminate significant environmental impacts.

ES.2.2. Project Objectives

The Project objectives are to:

- issue a Term Permit or Permits for the operations of a chassis support facility or facilities for up to 25 years;
- optimize the use of existing land to support chassis storage;
- reduce inefficient chassis trips: currently, bobtails (truck tractors) are sometimes not able to obtain a chassis in the terminal and need to go to another terminal to retrieve a chassis and then return to the same terminal to retrieve a container, thus resulting in additional inefficient truck trips and vehicle miles traveled;
- provide a full-service depot that would increase the efficiency of terminal operations by providing storage, maintenance, repair, and stop/start functions of chassis, and/or wheeled empty container storage;
- advance POLA's zero-emission cargo-handling equipment goals by requiring their exclusive use at the site by January 1, 2030.

ES.2.3. CEQA Baseline

Consistent with LAHD practice, the CEQA baseline for the Project consists of conditions in calendar year 2023, the first full calendar year preceding publication of the NOP/IS on December 7, 2023. In 2023, activity within the boundaries of the Project site during the first quarter was comprised of empty container storage. Since the second quarter of 2023 activity has ceased, as the site was vacated and is not operated by any entity. The baseline conditions for specific resource areas are described in more detail in Chapter 2, *Project Description*. However, for purposes of defining the CEQA baseline, it is considered that activities at the Project site during 2023 are primarily negligible; accordingly, the majority of the baseline for the CEQA analyses reflects zero activity.

ES.3 Proposed Project

ES.3.1. Overview

The Proposed Project includes construction and operation of a chassis support and container storage facility at the Port, on Terminal Island. Additional elements of the Proposed Project include an amendment of the Port Master Plan to change the site's land use designations of Maritime Support (23.6 acres), Liquid Bulk (53.3 acres), and Container (12.3 acres) to a dual designation of Maritime Support and Container for the area within "the loop" and issuance by the LAHD of a 25-year entitlement (if completed by an applicant; no entitlement needed if completed by LAHD). The Project site is located at 740 Terminal Way, San Pedro, at the Port Terminal Island and is bounded by Navy Way to the east, Ferry Street to the west, Terminal Way to the south, and State Route (SR) 47 to the north (Figures 2-1 and 2-3).

ES.3.2. Project Construction

Construction of the Proposed Project is described in detail in Section 2.5.2, *Construction*. The Proposed Project would include development of the approximately 89.2~~80~~-acre site for use as a chassis depot and ancillary empty container storage facility. Construction of the Proposed Project would span approximately 24 months. Proposed construction activities for the site include:

- installation of asphalt concrete to pave approximately ~~75~~ 73 acres of the 89.2-acre site for backland storage use;
- installation of stormwater drainage and sewage systems in compliance with the City of Los Angeles Low Impact Development (LID) Ordinance and City of Los Angeles Bureau of Sanitation (LA Sanitation & Environment) requirements;
- installation of approximately 7,000 linear feet (lf) of chain-link fencing for the perimeter of the site (additional chain link fencing on k-rails would be required to separate areas for different operators, if necessary);
- installation of approximately 3,600 chassis stalls (e.g., parking spaces) at 90 degrees, plus chassis/bombcart wheeled storage stalls, forklift, and utility tractor rig (UTR) parking;
- installation of 40 high mast light poles (maximum height of 100 feet);
- as-needed installation of vaults, switchgears, transformers, associated concrete pads/foundations, and conduit for electrical connections;
- installation of approximately 40 fire hydrants;
- installation of charging and fueling infrastructure;
- construction of a Los Angeles Department of Water and Power (LADWP) substation;
- construction of up to two approximately 10-foot by 40-foot office/welfare buildings;
- installation of up to four corrugated metal M&R canopies;
- construction of up to four approximately 30-foot tall, 16,000 sf, neutral tone steel canopy structures above a concrete foundation for use as roadability canopies, with an accompanying roadability support area (roadability center), up to ~~four~~eight approximately 200-sf longshore restrooms, and up to ~~12~~eight approximately 300-sf guard booths; and
- interior modification (e.g., replace carpet, repair utilities, repaint interior, etc.) of an approximately 2,900-square-foot (sf) office building at 750 Eldridge Street that can be shared among multiple operating companies/tenants (existing potable water connection, toilets, sinks, and sanitary sewer are available).

ES.3.3. Project Operation

Operation of the Proposed Project is described in detail in Section 2.5.3, *Operation*. Under the Proposed Project, a chosen operating company/tenant (or multiple companies/tenants) would operate a chassis support facility, which could provide: chassis storage, M&R facilities, and/or wheeled empty container storage. Yard equipment to support operations would include fourteen 30,000-pound forklifts, fourteen 10,000-pound forklifts, and two UTRs. Operations under the Proposed Project would occur under a new entitlement for up to 25 years.

ES.4 Alternatives

ES.4.1. Alternative 1 – No Project Alternative

State CEQA Guidelines Section 15126.6(e) requires the analysis of a no-project alternative. This analysis must discuss the existing conditions as well as what would be reasonably expected to occur in the foreseeable future if the Proposed Project is not approved. Under the No Project Alternative (Alternative 1), the Project site would remain unused. Conditions under this alternative would remain the same as baseline conditions, as no construction or operational activities would occur. No other proposed development at the site has been permitted or approved.

ES.4.2. Alternative 2 – Reduced Project Alternative

Under the Reduced Project Alternative (Alternative 2), the Project site area would be reduced by about half, from 89.2 acres to ~~52.7~~ 51.7 acres (~~73~~ 71 acres [usable space]/2 + 16.2 acres other/outside loop). The number of buildings and structures to be constructed and operated at the site would be reduced by half. This alternative would include the same modifications and operation of the existing office building at 750 Eldridge Street and construction of the LADWP substation like the Proposed Project. Other construction and operational activities would be similar to the Proposed Project, but with reduced intensity given the smaller area. For example, less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced footprint.

ES.4.3. Alternatives Considered But Not Further Evaluated

Two alternatives were considered based on comments received during the public scoping period (December 7, 2023 – January 22, 2024) and in coordination with LAHD, as discussed in Section 5.2.3, *Alternatives Considered But Not Further Evaluated*, and include:

- Container Storage Only Alternative; and
- Half Peel-Off Alternative.

These alternatives were eliminated from further consideration because they would not meet most of the basic Project objectives, were deemed infeasible, or would be unable to avoid or substantially lessen one or more of the significant environmental impacts of the Proposed Project (State CEQA Guidelines Section 15126.6(c)).

ES.4.4. Environmentally Superior Alternative

CEQA requires identification of an environmentally superior alternative. The environmentally superior alternative is the alternative found to have an overall environmental advantage compared to the other alternatives based on the impact analysis in the EIR (Chapter 3). Table 5-2 in Chapter 5, *Comparison of Alternatives*, presents a comparison of the Proposed Project and each alternative for each resource area analyzed in this EIR.

The No Project Alternative (Alternative 1) is identified as having the fewest impacts because no construction or operations would occur. However, CEQA requires that if the environmentally superior alternative is the No Project Alternative, another alternative be identified as environmentally superior (State CEQA Guidelines Section 15126.6(e)(2)). Accordingly, the Reduced Project Alternative (Alternative 2) was evaluated. Based on the comparison, the Reduced Project Alternative (Alternative 2) impacts would be less severe than those of the Proposed Project ~~and~~, although it would not avoid the significant and unavoidable air quality impact from NOx emissions during operations at full buildout (~~2046~~2049). ~~Accordingly, the Reduced Project Alternative (Alternative 2) could be considered the environmentally superior alternative.~~

The Reduced Project Alternative (Alternative 2) would ~~satisfy~~accommodate the Project objectives (Section ES.2.2, *Project Objectives*), but to a lesser degree, as it would reach capacity faster than the Proposed Project and would have a reduced ability to decrease container dwell time for empty containers at the marine terminal, inefficient chassis trips, double-handling of empty containers, and increase on-terminal efficiency by having sufficient readily available chassis. Improving efficiencies reduces the wasteful use of nonrenewable resources (e.g., fossil fuel), number of truck trips, and greenhouse gas (GHG) emissions; therefore, the greater long-term operational efficiency of the Proposed Project would offset the Project-specific NOx emissions and greater short-term construction impacts making the Proposed Project the "~~e~~Environmentally ~~s~~Superior ~~a~~Alternative."

ES.5 Environmental Impacts

Based on the NOP/IS (Final EIR Appendix A), the following issues have been determined to be potentially significant and are therefore evaluated in this EIR:

- Air Quality and Health Risk
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials

The criteria for determining the significance of environmental impacts are described for each issue in Chapter 3, *Environmental Analysis*. Chapter 4, *Cumulative Analysis*, discusses the cumulative impacts of the Proposed Project and the alternatives. Chapter 5, *Comparison of Alternatives*, compares the alternatives, Chapter 6, *Significant Irreversible Changes*, summarizes the Proposed Project's significant, irreversible commitments of resources, and Chapter 7, *Growth-Inducing Impacts*, discusses growth-inducing impacts. Summary descriptions of the impacts, mitigation measures, and residual impacts for the Proposed Project and alternatives are provided in Table ES-1.

ES.5.1. Impacts Not Considered in this EIR

The scope of this EIR was established based on the NOP/IS issued by LAHD on December 7, 2023 (Final EIR Appendix A), and on the comments received by agencies and members of the public during the scoping period. The NOP/IS concluded that certain topics would result in a less-than-significant or no impact and need not be evaluated in the EIR. Accordingly, the EIR does not analyze aesthetics, agriculture and forestry, biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire.

ES.5.2. Impacts of the Proposed Project and Alternatives

Table ES-1 provides a summary of the impacts of the Proposed Project and alternatives, as well as Project Features (PF) and mitigation measures (MM) to reduce impacts.

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

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
3.1 Air Quality and Health Risk				
Proposed Project	**AQ-1:** Would the Proposed Project result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions?	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-2: Would the Proposed Project result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance?	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-3: Would the Proposed Project result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance?	Operation emissions would be significant for NOx in all operational years ~~Potentially Significant~~	**PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Significant and Unavoidable
	AQ-4: Would the Proposed Project result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance?	Less Than Significant	Mitigation Not Required	Less Than Significant

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
Proposed Project (Continued)	**AQ-5:** Would the Proposed Project expose receptors to significant levels of TACs?	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-6: Would the Proposed Project conflict with or obstruct implementation of an applicable air quality plan?	Less Than Significant	Mitigation Not Required	Less Than Significant
Alt 1 – No Project	**AQ-1:** Would Alternative 1 result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions?	No Impact	Mitigation Not Required	No Impact
	AQ-2: Would Alternative 1 result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance?	No Impact	Mitigation Not Required	No Impact
	AQ-3: Would Alternative 1 result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance?	No Impact	Mitigation Not Required	No Impact
	AQ-4: Would Alternative 1 result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance?	No Impact	Mitigation Not Required	No Impact
	AQ-5: Would Alternative 1 expose receptors to significant levels of TACs?	No Impact	Mitigation Not Required	No Impact
	AQ-6: Would Alternative 1 conflict with or obstruct implementation of an applicable air quality plan?	No Impact	Mitigation Not Required	No Impact
Alt 2 – Reduced Project	**AQ-1:** Would Alternative 2 result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions?	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-2: Would Alternative 2 result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance?	Less Than Significant	Mitigation Not Required	Less Than Significant

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
Alt 2 – Reduced Project (Continued)	**AQ-3:** Would Alternative 2 result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance?	Operation emissions would be significant for NOx in all operational years ~~Less Than Significant~~	~~Mitigation Not Required~~ **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Significant and Unavoidable ~~Less Than Significant~~
	AQ-4: Would Alternative 2 result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance?	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-5: Would Alternative 2 expose receptors to significant levels of TACs?	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-6: Would Alternative 2 conflict with or obstruct implementation of an applicable air quality plan?	Less Than Significant	Mitigation Not Required	Less Than Significant
3.2 Energy				
Proposed Project	**EN-1:** Would the Proposed Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant	Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Less Than Significant
Alt 1 – No Project		No Impact	Mitigation Not Required	No Impact
Alt 2 – Reduced Project		Less Than Significant	Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment	Less Than Significant

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
3.3 Greenhouse Gas Emissions				
Proposed Project	**GHG-1:** Would the Proposed Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	~~Less Than Potentially~~ Significant	~~Mitigation Not Required~~ **MM GHG-1:** GHG Reduction Offsets **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Less Than Significant
	GHG-2: Would the Proposed Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	Mitigation Not Required	Less Than Significant
Alt 1 – No Project	**GHG-1:** Would Alternative 1 generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No Impact	Mitigation Not Required	No Impact
	GHG-2: Would Alternative 1 conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No Impact	Mitigation Not Required	No Impact
Alt 2 – Reduced Project	**GHG-1:** Would Alternative 2 generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant	Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Less Than Significant

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
Alt 2 – Reduced Project (Continued)	**GHG-2:** Would Alternative 2 conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	Mitigation Not Required	Less Than Significant
3.4 Hazards and Hazardous Materials				
Proposed Project	**HAZ-1:** Would the Proposed Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	Potentially Significant	**MM HAZ-1:** Characterize Soil, Soil Vapor, and Groundwater Contamination	Less Than Significant
Alt 1 – No Project		No Impact	Mitigation Not Required	No Impact
Alt 2 – Reduced Project		Potentially Significant	**MM HAZ-1:** Characterize Soil, Soil Vapor, and Groundwater Contamination	Less Than Significant

ES.5.2.1. Unavoidable Significant Impacts

This EIR has determined that implementation of the Proposed Project would result in significant and unavoidable impacts related to:

- **Air Quality ~~and Health Risk~~:** Operational NOx emissions would result in a significant unavoidable impact related to Air Quality ~~and Health Risk~~ for the Proposed Project and Reduced Project Alternative (Alternative 2) (Impact AQ-3), even after implementation of PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1(*Zero-Emission Cargo-Handling Equipment*). No other significant unavoidable impacts related to Air Quality ~~and Health Risk~~ would occur for the Proposed Project or alternatives.

ES.5.2.2. Summary of Significant Impacts that Can be Mitigated, Avoided, or Substantially Lessened

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

- **GHG Emissions:** The total annual amortized construction and operations emissions would result in a significant GHG emissions impact (Impact GHG-1) throughout the operational life of the Proposed Project. MM GHG-1 (*GHG Reduction Offsets*) would require carbon offsets to be purchased and retired to offset the equivalent amount of GHG emissions generated by the Project in excess of LAHD's significance threshold of 10,000 metric tons carbon dioxide equivalent ($MTCO_2e$) per year. From the first year of the Permit(s), through the end of the term of the Permit(s), carbon offsets shall be purchased and retired each

year in an amount that would be the equivalent of the Project's estimated residual GHG emissions. In addition, PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo Handling Equipment*) would be implemented, requiring that all yard equipment be zero-emissions models by January 1, 2030, and that all cargo handling equipment be zero-emissions models by the start of operations if feasible but no later than January 1, 2030, respectively.

- **Hazards and Hazardous Materials:** The existing contaminated soil, groundwater, and soil vapor at the Project site would result in a significant hazards and hazardous materials impact (Impact HAZ-1) during construction and operations. MM HAZ-1 (*Characterize Soil, Soil Vapor, and Groundwater Contamination*) would ensure that contaminated soil, groundwater, and soil vapor in areas of Project disturbance and where proposed buildings and structures would be built are characterized to allow for implementation of appropriate handling, storage, and reuse or disposal, including use of suitable personal protective equipment by workers, as part of the Soil Management Plan, and proper design of a vapor intrusion mitigation system (VIMS) and vapor monitoring, if needed. Additionally, compliance with the LADBS General Methane Mitigation Requirements (LAMC Section 91.7103), as enforced by the City of Los Angeles Fire Department, would reduce the potential for adverse health impacts to workers in Project site structures from methane.

ES.5.2.3. Summary of Less-than-Significant Impacts

This EIR has determined that the Proposed Project and alternatives would result in less-than-significant impacts without mitigation for the following issues.

- **Air Quality:** Environmental impacts due to construction and operational emissions and related off-site ambient air pollution concentrations; exposure of receptors to significant levels of toxic air contaminants (TACs) during construction; and conflict with or obstruct implementation of an applicable air quality management plan (AQMP).
- **Energy:** Environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy; and conflict/obstruct state or local renewable energy plan.
- **Greenhouse Gas Emissions:** Environmental impacts due to ~~the generation of GHG emissions; and~~ conflict with plans, policies, or regulations for reducing GHG emissions.

ES.5.2.4. Cumulative Impacts

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

A list of related projects in the general area of the Port that could contribute to cumulative impacts was developed (Table 4-1). The Proposed Project and the alternatives were analyzed in conjunction with those related projects to assess the potential to contribute to significant cumulative impacts. Cumulative impact evaluations for each resource are included in Chapter 4 of this EIR.

The analysis concludes that the Proposed Project and alternatives would make no cumulatively considerable contributions to significant cumulative impacts in any resource areas under CEQA, with the exception of Air Quality ~~and Health Risk~~. While there would be no health risk impact, ~~T~~the Proposed Project~~'s~~ and Reduced Project Alternative (Alternative 2) would result in NOx emissions during operations that would be significant and therefore cumulatively considerable, resulting in a cumulatively significant impact.

ES.5.2.5. Significant Irreversible Changes to the Environment

As discussed in Chapter 6 of this EIR, implementation of the Proposed Project would require the use of non-renewable resources, including energy (fossil fuels and electricity) and non-renewable construction materials. Most of the energy uses would represent irretrievable expenditures of nonrenewable resources, although some electricity would be provided by renewable sources and would not represent an irretrievable and irreversible commitment. The minimal irreversible changes likely would be justified by the economic growth in the area, which the Proposed Project would provide. The Proposed Project would also reduce inefficient use of nonrenewable sources at the Port by reducing container dwell time for empty containers at the marine terminal, reducing inefficient chassis trips, providing on-terminal efficiency by providing a centralized location with readily available chassis, providing a full-service depot to improve the efficiency of terminal operations, and providing off-terminal maritime support to increase the efficiency of goods movement in the Port. The irreversible changes associated with the Proposed Project are considered justified under CEQA.

ES.5.2.6. Growth-Inducing Impacts

As discussed in Chapter 7 of this EIR, the Proposed Project would directly accommodate future economic growth by increasing on-terminal efficiency and efficiency of goods movement in the Port but would not foster population growth in the Port's region of influence (Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County). Although the Proposed Project would improve on-terminal and goods movement efficiency in the Port, this change would not in itself stimulate significant population growth. Further, it would not remove obstacles to population growth, nor would it necessitate construction of new community facilities that would lead to additional growth in the surrounding area.

ES.6 Public Involvement

During the NOP/IS scoping process, individuals and agencies provided comments on the scope and content of the Draft EIR. The scoping period lasted from December 7, 2023, until January 22, 2024, and included one virtual scoping meeting on January 9, 2024. Table 1-2 in Chapter 1, *Introduction*, presents a summary of the relevant comments on

the NOP/IS and where a particular comment would be addressed in this EIR. Key comments provided general guidance on preparing the air quality and GHG emissions analyses, requested consideration of the Vertical Chassis storage system, that the Terminal Island remain as is, and that the operator (if chosen) be identified.

A Draft EIR was distributed to various government agencies, organizations, and individuals for a 45-day public review period, which started on September 15, 2025 and ended on October 30, 2025. The Draft EIR was also made available for review at LAHD's Environmental Management Division located at 425 South Palos Verdes Street, San Pedro, CA 90731, and online at the Port's website. One virtual public hearing was held during the public review period for the Draft EIR on October 1, 2025. No verbal comments were received at the virtual public hearing. During the public review period, five comment letters were received. These letters will be maintained as part of the project record; formal responses are provided in Chapter 10 (*Responses to Comments*) of this Final EIR.

A Partially Revised and Recirculated Draft EIR was also distributed to various government agencies, organizations, and individuals for a 45-day public review period starting on January 26, 2026 and ending on March 11, 2026. The Partially Revised and Recirculated Draft EIR was also made available for review at LAHD's Environmental Management Division located at 425 South Palos Verdes Street, San Pedro, CA 90731, and online at the Port's website. No public hearings were held for the Partially Revised and Recirculated Draft EIR. One comment letter was received during the Partially Revised and Recirculated Draft EIR review period. This letter will be maintained as part of the Project record; a formal response is provided in Chapter 10 (*Responses to Comments*) of this Final EIR.

ES.7 Areas of Controversy

During the 2025 Draft EIR public/agency comment period, the California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) expressed concerns regarding the basis for estimating air pollutant emissions from Proposed Project construction and operations. Revisions to the emissions basis requested included updating haul truck distances for export soil during construction based on specific disposal facility or landfill locations and adjusting truck on-site idling times during Project operations to more accurately reflect on-site queuing, security checks, staging, loading, and unloading operations. These concerns were resolved through the Recirculated Draft EIR process. No additional areas of controversy have been identified by LAHD.

ES.8 Issues to be Resolved

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

- This EIR adequately describes the environmental impacts of the Proposed Project;
- The recommended mitigation measure(s) should be adopted or modified; or
- The Proposed Project should or should not be approved for implementation.

Chapter 1
Introduction

1.1 Introduction

Los Angeles Harbor Department (LAHD) proposes to construct and operate a chassis support facility on an approximately 89.2-acre site at the Port of Los Angeles (Port or POLA) on Terminal Island. The maritime support facility (MSF) would ~~pave approximately 73 acres and~~ provide ~~73~~ 71 acres of usable space (73 acres of paved area) for chassis/wheeled empty container storage for use by all 12 terminals located in the POLA and Port of Long Beach (POLB) and could be operated by multiple companies/tenants.

The Proposed Project would require approval and permits from the Los Angeles Board of Harbor Commissioners (Harbor Commission), permits from other City of Los Angeles departments, the State Water Resources Control Board (SWRCB), and approval by the California Coastal Commission of an amendment to the Port Master Plan (PMP). Prior to issuance of permits or other Project approvals, each of these decision-making bodies must consider the Proposed Project's environmental effects, which, in this case, are identified in this Environmental Impact Report (EIR).

This EIR has been prepared in accordance with the requirements of CEQA (Public Resources Code [PRC] §21000 et seq.) and the State California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.). LAHD is the CEQA lead agency.

The Proposed Project and its alternatives are described in detail in Chapter 2, *Project Description*. Chapter 3 of this EIR, *Environmental Analysis*, describes the environmental resources which were previously determined through an Initial Study analysis (December 2023) as having potentially significant impacts, and evaluates in detail the potential impacts on those resources that are likely to occur as a result of constructing and operating the Proposed Project and alternatives. This EIR will be used to inform decision-makers and the public about the environmental effects of construction at the Project site and the operation of the proposed MSF.

1.2 Background

1.2.1. Project Location

LAHD operates the Port under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, §601) and the California Coastal Act (PRC Division 20, §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 Port encompasses 7,500 acres of land and 43 miles of waterfront and provides a major gateway for international goods and services. The Port comprises approximately 25 major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger facilities. In calendar year 2021, the Port handled approximately 222 million metric revenue tons of cargo (LAHD, 2022) and docked 1,863 vessels. In addition to cargo business operations, the Port is home to commercial fishing vessels, shipyards, and boat repair facilities, as well as recreational, community, and educational facilities.

The Project site is an 89.2-acre unoccupied parcel at 740 Terminal Way in San Pedro, CA 90731 on Terminal Island in the Port. The site is bounded by Navy Way to the east, Ferry Street to the west, Terminal Way to the south, and State Route (SR) 47 to the north. Formerly used for empty container storage, the site is now vacant and available for entitlements for temporary uses. Land uses in the vicinity of the Project site are primarily comprised of container operations. Los Angeles Fire Department Station 40 is located adjacent to the west of the Project site, east of Ferry Street. The Terminal Island Water Reclamation Plant is located to the west of the Project site, west of Ferry Street.

1.2.2. Project Overview

The Proposed Project would construct a new MSF over a period of approximately 24 months. Construction activities would include:

- installation of asphalt concrete to pave approximately ~~75~~ 73 acres of the 89.2-acre site for backland storage use;
- installation of stormwater drainage and sewage systems in compliance with the City of Los Angeles Low Impact Development (LID) Ordinance and City of Los Angeles Bureau of Sanitation (LA Sanitation & Environment) requirements;
- installation of approximately 7,000 linear feet (lf) of chain-link fencing for the perimeter of the site (additional chain link fencing on k-rails would be required to separate areas for different operators, if necessary);
- installation of approximately 3,600 chassis stalls (e.g., parking spaces) at 90 degrees, plus chassis/bombcart wheeled storage stalls, and forklift and utility tractor rig (UTR) parking;
- installation of 40 high mast light poles (maximum height of 100 feet);
- as-needed installation of vaults, switchgears, transformers, associated concrete pads/foundations, and conduit for electrical connections;
- installation of approximately 40 fire hydrants;
- installation of charging and fueling infrastructure;

- construction of a Los Angeles Department of Water and Power (LADWP) substation;
- construction of up to two approximately 10-foot by 40-foot office/welfare buildings;
- installation of up to four corrugated metal M&R canopies;
- construction of up to four approximately 30-foot tall, 16,000 sf, neutral tone steel canopy structures above a concrete foundation for use as roadability canopies, an accompanying roadability support area, up to four approximately 200-sf longshore restrooms, and up to 12 approximately 300-sf guard booths; and
- interior modification (e.g., replace carpet, repair utilities, repaint interior, etc.) of an approximately 2,900-square-foot (sf) office building at 750 Eldridge Street that can be shared among multiple operating companies/tenants (existing potable water connection, toilets, sinks, and sanitary sewer are available).

During Proposed Project operations, the chosen operating company/tenant(s) would operate a chassis support facility, which could provide: chassis storage, maintenance, and repair facilities; and/or wheeled empty container storage. Yard equipment to support operations would include fourteen 30,000-pound forklifts, fourteen 10,000-pound forklifts, and two UTRs. Operations under the Proposed Project are assumed to occur for up to 25 years. See Chapter 2, *Project Description*, for a detailed description of the Proposed Project. Alternatives are described below in Section 1.6, *Alternatives*.

1.3 CEQA and the Purpose of an EIR

CEQA was enacted by the California Legislature in 1970, with the intent that all agencies of the state government that "regulate activities of private individuals, corporations, and public agencies that are found to affect the quality of the environment shall regulate such activities so that major consideration is given to preventing environmental damage while providing a decent home and satisfying living environment for every Californian" (13 PRC 21000, Legislative Intent). Public agency decision-makers are required to consider and document the environmental effects of their actions and, whenever possible, avoid adverse effects on the environment. When a state or local agency determines that a proposed project has the potential to result in significant adverse environmental impacts, an EIR is prepared. The purpose of an EIR is to identify the significant effects of a proposed project on the physical environment, identify alternatives to reduce the project's significant effects while achieving the project objectives, and indicate the manner in which a project's significant effects can be mitigated or avoided. A public agency must mitigate or avoid significant environmental impacts of projects it carries out or approves whenever feasible. In instances where significant impacts cannot be avoided or mitigated, the project can nonetheless be carried out or approved if the approving agency finds that economic, legal, social, technological, or other benefits outweigh the unavoidable significant environmental effects. An EIR is intended to be a full disclosure document to aid the public decision-making process.

1.4 Scope and Content of the EIR

The scope of this Final EIR was defined on the basis of a Notice of Preparation/Initial Study (NOP/IS), a Draft EIR, and a Partially Revised and Recirculated Draft EIR prepared pursuant to CEQA (see Final Appendix A), and comments received during the scoping and public review processes. The NOP/IS was posted on December 7, 2023, and an online public scoping meeting was conducted on January 9, 2024. One speaker commented at the public meeting and three comment letters were received during the scoping period (December 7, 2023 to January 22, 2024). A 45-day Draft EIR public review period ran from September 15, 2025 to October 30, 2025 and one virtual public hearing was held on October 1, 2025. Five comment letters were received during the public review period, and no comments were made at the public hearing. In response to comments received during the Draft EIR public review period, a Partially Revised and Recirculated Draft EIR was prepared using updated methodologies for the calculation of Project emissions. This Partially Revised and Recirculated Draft EIR was made available for public review from January 26, 2026 to March 11, 2026, resulting in one additional comment letter.

1.4.1. Scope of Analysis

This EIR has been prepared in accordance with the State CEQA Guidelines (14 CCR 15000 et seq.) and includes all the sections required by CEQA. The criteria for determining the significance of environmental impacts in this EIR analysis are described in the "Significance Criteria" sections of each resource topic in Chapter 3, *Environmental Analysis*. The threshold of significance for a given environmental effect is the level at which LAHD finds a potential effect of the Proposed Project or alternative to be significant. Under CEQA, a "threshold of significance" can be defined as a "quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant," (State CEQA Guidelines, §15064.7(a)). Except as noted in particular sections of the document, LAHD has adopted the significance thresholds set forth in Appendix G of the State CEQA Guidelines for purposes of this EIR.

The following resources are evaluated in this EIR:

- Air Quality and Health Risk
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials

The NOP/IS (see Final Appendix A) concluded that the Proposed Project would not result in significant impacts to the following resources: Agriculture and Forest Resources, Aesthetics, Biological Resources, Cultural Resources, Geology and Soil, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Per State CEQA Guidelines Section 15128, these resources do not need to be evaluated in this EIR. This EIR has been prepared by Aspen Environmental Group 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 judgment of LAHD. Staff members from LAHD and Aspen Environmental Group who helped prepare this EIR are identified in Chapter 8, *List of Preparers and Contributors*.

1.4.2. Scoping Comments

Table 1-1 summarizes key issues raised in the scoping comments received on the NOP/IS. The comments received from regulatory agencies and the public during the scoping process were acknowledged and addressed in the EIR.

Table 1-1: Summary of Key Scoping Comments

Commenter	Key Issues Raised	Sections Addressed
Abel Alvarez (S.A. Recycling)	Requests that Terminal Island remain as is for employment reasons, city benefits, and exportation of material.	Comment noted. Site is currently unused and therefore does not provide any employment or benefits.
Doug Corbett (Chassis Systems, Inc.)	Consider benefits of the Vertical Chassis storage system.	Comment noted. This technology could be considered by operator(s) but may require additional CEQA analysis.
South Coast Air Quality Management District	General guidance on preparing the air quality and greenhouse gas emissions analyses.	Section 3.1, *Air Quality and Health Risk* Section 3.3, *Greenhouse Gas Emissions*
Marcus Holguin	Address if an operator for this project has been identified.	Chapter 2, Project Description – No specific operators have been identified at this time.

1.4.3. Intended Uses of this EIR

This Final EIR has been prepared in accordance with applicable federal and state environmental regulations, policies, and laws to inform state and local decision-makers about the potential environmental impacts of the Proposed Project and alternatives. As an informational document, an EIR does not recommend approval or denial of a Project. The Draft EIR ~~is~~ was provided to the public for review, comment, and participation in the planning process. After public review and comment on the Draft EIR, a Partially Revised and Recirculated Draft EIR was prepared to address agency comments on the Draft EIR. Following public review of the Partially Revised and Recirculated Draft EIR, this Final EIR was~~will be~~ prepared, including responses to comments on both the Draft EIR and Partially Revised and Recirculated Draft EIR received from agencies, organizations, and individuals. This~~e~~ Final EIR will be distributed to provide the basis for decision-making by the CEQA lead agency (LAHD) and other concerned agencies. LAHD has jurisdictional authority over the Proposed Project primarily pursuant to the Tidelands Trust, California Coastal Act, and the Los Angeles City Charter. This~~e~~ Final EIR will be used by LAHD, as the lead agency under CEQA, in making a decision regarding the construction and operation of the Project and in informing agencies considering permit applications and other actions required to construct and operate the Project. LAHD's certification of the Final EIR, Notice of Completion, Findings of Fact, and Statement of Overriding Considerations ~~(if necessary)~~ would document their decision as to the adequacy of the Final EIR and inform subsequent decisions by LAHD whether to approve and construct

the Project. Other agencies that may have jurisdiction over some part of the Project or a resource area affected by the Project are expected to use this EIR as part of their approval or permit processes as set forth in Table 2-1. Specific approvals that could be required for this Project include but are not limited to a California Department of Transportation, Los Angeles Department of Building and Safety (LADBS) Building Permit, Los Angeles Department of Transportation (LADOT) B-Permit, a Construction General Permit and Industrial General Permit from the SWRCB, a Port Master Plan Amendment by the Board of Harbor Commissioners with certification by the California Coastal Commission, an entitlement, Coastal Development Permit, and Engineer Permit by the Board of Harbor Commissioners, and approval of construction contracts by LAHD and Los Angeles City Council. Actions that could be undertaken by LAHD following preparation of this Final EIR include certification of the EIR, approval of the Project, completion of a PMP amendment for Coastal Commission approval, completion of final design for the facility, issuance of a Coastal Development Permit, approval of engineering permits, obtaining other agency permits and approvals, and approval of construction contracts.

1.4.4. EIR Organization

Table 1-2 contains a list of sections required under CEQA and references the specific chapter in this document where the specific information is located.

Table 1-2: Organization and Contents of the EIR

EIR Section	Description
Executive Summary	Summarizes the Proposed Project and alternatives, potential significant impacts and mitigation measures, the environmentally superior alternative, and unresolved issues and areas of controversy.
Chapter 1 Introduction	Summarizes the key Proposed Project features and elements, the intended uses of the document and authorizing actions, the purpose of CEQA, the Proposed Project's relationship to existing plans and policies, the scope and content of the document, and the organization of the document. Describes Port of Los Angeles environmental programs and initiatives relevant to the Proposed Project. Identifies and describes Project alternatives initially considered but not carried forward for detailed review, and alternatives evaluated in the EIR at a detailed level.
Chapter 2 Project Description	Describes the Proposed Project; the objectives of the Project; CEQA baseline; and lists the lead, responsible, and trustee agencies that could rely on this EIR for issuance of a permit or other approval.
Chapter 3 Environmental Analysis	Describes the existing conditions for each environmental resource area, criteria for judging significance of an impact, impact assessment methodology, impacts that would result from the Proposed Project and each alternative, mitigation measures that would eliminate or reduce significant impacts, and the mitigation monitoring program.
Chapter 4 Cumulative Analysis	Summarizes significant cumulative impacts and whether the Proposed Project or any of the alternatives makes a cumulatively considerable contribution to those significant impacts.
Chapter 5 Comparison of Alternatives	Compares the environmental impacts of the Proposed Project and alternatives and identifies the Environmentally Superior Alternative.
Chapter 6 Significant Irreversible Changes	Describes the significant irreversible changes to the environment associated with the Proposed Project.

EIR Section	Description
Chapter 7 Growth-Inducing Impacts	Discusses the extent to which the Proposed Project would result in growth-inducing impacts.
Chapter 8 List of Preparers and Contributors	Lists the individuals involved in preparing this EIR.
Chapter 9 References	Identifies the materials and documents referenced in preparing this EIR.
Chapter 10 Responses to Comments	Presents the comment letters received on the Draft EIR and Partially Revised and Recirculated Draft EIR, along with detailed responses to comments.

1.5 Key Principles Guiding Preparation of this EIR

State CEQA Guidelines Section 21002.1(e) states that:

> *To provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall, in accordance with Section 21100, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant.*

1.5.1. Forecasting

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

1.5.2. 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 Proposed Project or alternative to be significant. "Threshold of significance" can be defined as a "quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant," (State CEQA Guidelines Section 15064.7(a)).

1.5.3. Disagreement Among Experts

During preparation of the EIR, it is possible that evidence that might raise disagreements will be presented during the public review of the Draft EIR documents. 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 EIR need not resolve all such disagreements. In accordance with the provisions of the State CEQA Guidelines, conflict of evidence and expert opinions on an issue concerning the environmental impacts of the Proposed Project—when LAHD is aware of these controversies—has been identified in this EIR. The EIR has summarized the conflicting opinions 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 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 that decision is supported by substantial evidence.

1.5.4. CEQA Baseline

State CEQA Guidelines Section 15125 requires EIRs to include a description of the physical environmental conditions in the vicinity of the Proposed Project that exists at the time of the NOP/IS. For the purposes of this EIR, the NOP/IS was released in December 2023. Therefore, the appropriate CEQA baseline has been determined to be the environmental setting and existing conditions occurring at the Project site during the calendar year of 2023 (i.e., January 2023 to December 2023). The CEQA baseline represents the setting at a fixed point in time, with no projected growth over time. Activities under the CEQA baseline are considered negligible in the foreseeable future as no future development has been permitted or approved.

1.5.5. Duty to Mitigate

According to State CEQA Guidelines Section 15126.4(a), 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. State CEQA Guidelines Section 15041 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 §15040). In addition to limitations imposed by CEQA, the U.S. Constitution limits the authority of regulatory agencies. The Constitution limits the authority of a public agency 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.

1.5.6. Requirements to Evaluate Alternatives

According to CEQA regulations, the alternatives section of an EIR is required to: Rigorously explore and objectively evaluate a range of reasonable alternatives; Include reasonable alternatives not within the jurisdiction or congressional mandate of the lead agency, if applicable; Include the No Project Alternative; Develop substantial treatment of each alternative, including the proposed action, so that reviewers could evaluate their comparative merits; Identify the preferred alternative of the lead agency; Include appropriate mitigation measures (when not already part of the proposed action or alternatives); and Present the alternatives that were eliminated from detailed study and briefly discuss the reason(s) for elimination. State CEQA Guidelines Section 15126.6 requires that an EIR describe a reasonable range of feasible alternatives to a proposed project, or to the location of a proposed project that could feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen any significant environmental impacts. According to State CEQA Guidelines, the EIR should compare merits of the alternatives and determine an environmentally superior alternative. Section 2.7, *Alternatives*, sets forth potential alternatives to the Proposed Project, and Section 5.3, *Alternatives Comparison*, evaluates their suitability, as required by the State CEQA Guidelines Section 15126.6. Alternatives for an EIR usually take the form of No Project Alternative, reduced project size, different project design, or suitable alternative project sites. The range of alternatives discussed in an EIR is governed by the "rule of reason" that requires the identification of only those alternatives necessary to permit a reasoned choice between the alternatives and a proposed project. An EIR need not consider an alternative that would be infeasible. State CEQA Guidelines Section 15126.6 explains that the evaluation of project alternative feasibility can consider "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or

regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." The EIR is not required to evaluate an alternative whose effects could not be reasonably identified, or whose implementation is remote, speculative, or would not achieve the basic purposes of the Proposed Project.

1.6 Alternatives

1.6.1. Alternatives Evaluated in this EIR

According to State CEQA Guidelines Section 15126.6, an EIR need only examine in detail those alternatives that could reasonably meet most of the basic objectives of the Proposed Project. Only alternatives that would meet most of the objectives, as described in Section 2.3, *Project Objectives*, will be considered in the EIR. Those alternatives include the No Project Alternative (Alternative 1) and the Reduced Project Alternative (Alternative 2). Each of these alternatives is summarized below.

This section first presents a description of the alternatives that are carried forward in the detailed impact analysis and then describes the remaining alternatives that were considered but eliminated from further discussion (including the rationale for the decisions to eliminate the alternatives from detailed analysis). Because the Proposed Project is a development, State CEQA Guidelines Section 15126.6(e)(3)(B) is directly applicable to the Proposed Project:

> *If the project is…a development project on an identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.*

A more detailed description of each alternative, along with a general discussion of how the characteristics of the alternative would result in impacts different from those of the Proposed Project, is provided in Table 1-3.

1.6.1.1. Alternative 1 – No Project Alternative

The No Project Alternative (Alternative 1), which is required under State CEQA Guidelines Section 15126.6(e), represents what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved. Under this alternative, the Project site would remain unused. Conditions under this alternative would remain the same as baseline conditions, as no construction or operational activities would occur. No other proposed development at the site has been permitted or approved. The No Project Alternative (Alternative 1) would not meet any of the Project's objectives.

1.6.1.2. Alternative 2 – Reduced Project Alternative

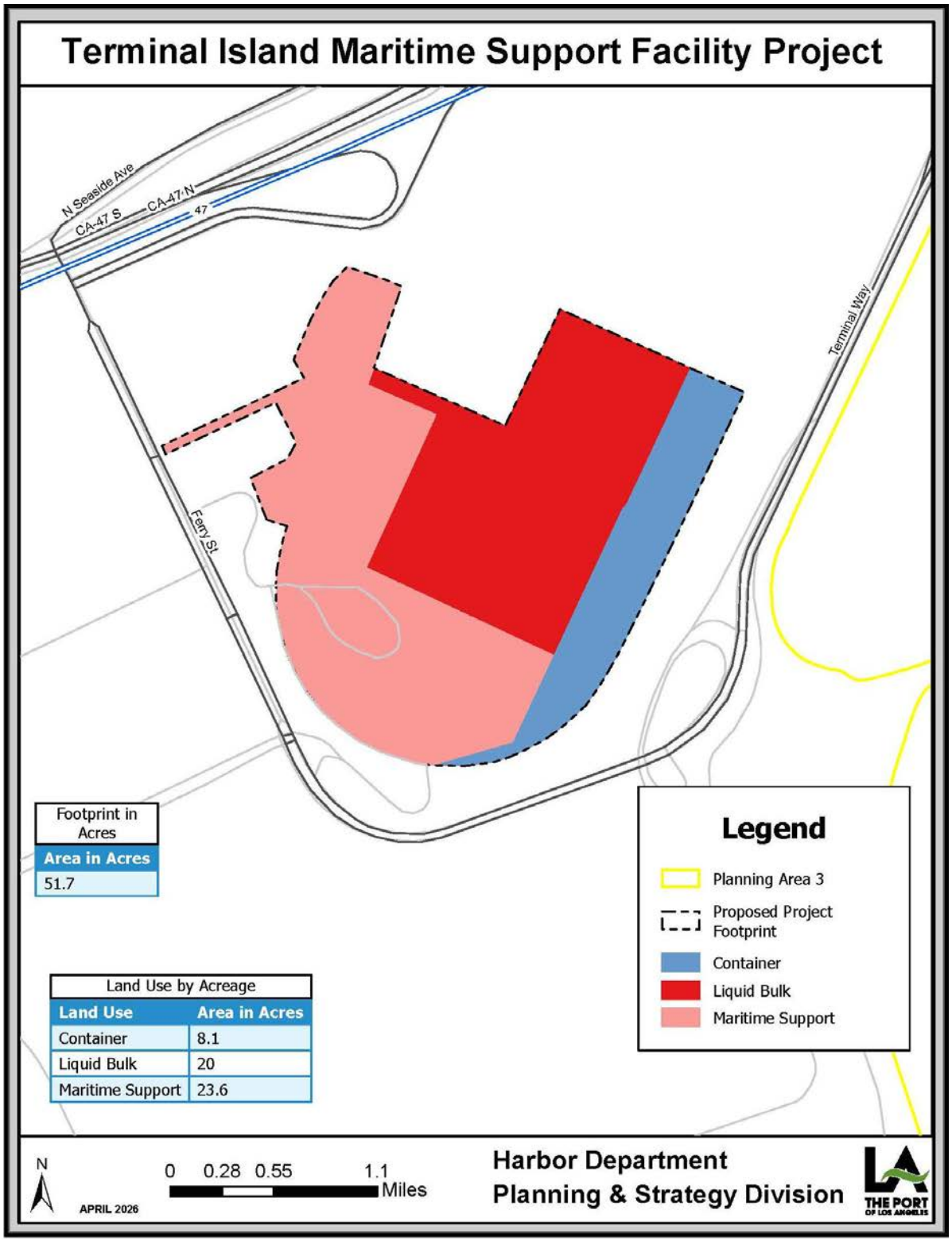
Under the Reduced Project Alternative (Alternative 2), the Project site area would be reduced by about half, from 89.2 acres to 51~~2~~.7 acres (~~73~~ 71 acres [usable space]/2 + 16.2 acres other/outside loop). The number of buildings and structures to be constructed and operated at the site would be reduced by half (Figure 1-1). This alternative would include the same modifications and use of the existing office building at 750 Eldridge Street and construction of the LADWP substation like the Proposed Project. Other construction and operational activities would be similar to the Proposed Project but with reduced intensity given the smaller area. For example, less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced footprint.

Table 1-3: Summary of Proposed Project and Alternatives at Full Buildout

Activity	2023	Full Buildout (Year 20492046)		
	CEQA Baseline	Proposed Project	Alt 1: No Project	Alt 2: Reduced Project[1]
Construction workers	0	60	0	30[2]
Operational employees	0	105	0	53[2]
Total truck trips, one-way trips/day	0	6,838	0[3]	3,419
Project Site (Acres) ~~Utilized~~	0	89.2	0	~~52.7~~ 51.7
Chassis Stalls	0	3,600	0	1,800
High mast light poles	0	40	0	20
Re-grading export volume (CY)	0	270,000	0	135,000[4]

1- Values were extrapolated based on the reduced Project footprint.
2- Exact number of construction workers may vary depending on construction schedule of the Reduced Project Alternative (Alternative 2).
3- Under the No Project Alternative (Alternative 1), the number of truck trips is treated the same as the CEQA baseline and is therefore zero.
4- Exact re-grading export volume may vary depending on distribution of cut across the site under the Reduced Project Alternative (Alternative 2).

Figure 1-1. Reduced Project Alternative (Alternative 2) Boundary and Existing PMP Land Use Designations – REVISED



Note: Boundaries and associated acreages presented are approximate and based on a conceptual design only.

1.6.2. Alternatives Considered But Not Further Evaluated

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agencies may make an initial determination as to which alternatives are ostensibly feasible and therefore merit in-depth consideration, and which are infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines Section 15126(f)(2)). Under CEQA, alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or would not avoid or substantially reduce any significant environmental effects (State CEQA Guidelines Section 15126.6(c)). Various alternatives were considered based on comments received on the NOP/IS and during preparation of the EIR but were eliminated from further discussion and analysis because they would not meet most of the basic Project objectives, were deemed infeasible, or would be unable to avoid significant environmental impacts. (State CEQA Guidelines Section 15126.6(c)). Those alternatives were:

- Container Storage Only Alternative; and
- Half Peel-Off Alternative.

These alternatives are described in Chapter 5, *Comparison of Alternatives*, along with an explanation of the rationale leading to their elimination from further analysis.

1.7 Availability of the Draft EIR and Partially Revised and Recirculated Draft EIR

The Draft EIR ~~is being~~was distributed directly to agencies, organizations, and interested groups and persons for comment in accordance with State CEQA Guidelines Section 15087. A 45-day comment period ~~has been~~was established, ~~which~~ beginnings on September 15, 2025, and endings on October 30, 2025. A printed document ~~is~~ was made available for review to interested parties at the Port of Los Angeles Environmental Management Division located at 425 South Palos Verdes Street, San Pedro, California 90731. In addition to printed copies of the Draft EIR, an electronic version was made available in its entirety on the Port's website: http://www.portoflosangeles.org/ceqa.

Additionally, the Partially Revised and Recirculated Draft EIR was distributed directly to agencies, organizations, and interested groups and persons for a 45-day review period beginning on January 26, 2026 and ending on March 11, 2026. A hard copy of the Partially Revised and Recirculated Draft EIR was made available for review at the Port of Los Angeles Environmental Management Division located at 425 South Palos Verdes Street, San Pedro, California 90731, and an electronic version was made available on the Port's website.

~~Please contact Uriel de los Reyes at (310) 221-4780 to schedule an appointment for document review. In addition to printed copies of the Draft EIR, an electronic version is available in its entirety on the Port of Los Angeles website at: http://www.portoflosangeles.org/ceqa.~~

~~Due to the size of the document, the electronic versions have been prepared as a series of PDF files to facilitate downloading and printing. Interested parties may provide written comments on the Draft EIR, which must be postmarked by October 30, 2025~~

~~Please address comments to:~~

~~Director of Environmental Management~~
~~Los Angeles Harbor Department~~
~~425 South Palos Verdes Street~~
~~San Pedro, CA 90731~~

~~Written comments may also be sent via e-mail to~~ ceqacomments@portla.org~~. Comments sent via e-mail should include the project title (Terminal Island Maritime Support Facility) in the subject line of the email. All comments received will become part of the public record for the Project.~~

Chapter 2
Project Description

2.1 Introduction

This chapter provides background information related to the Proposed Project and describes the Proposed Project's physical and operational elements. This section also provides a discussion of the California Environmental Quality Act (CEQA) baseline which sets the basis for the environmental setting of the impact analyses in Chapter 3, *Environmental Analysis*, and a description of the Project alternatives evaluated in this Environmental Impact Report (EIR).

2.2 Background and Project Overview

2.2.1. Background

The Los Angeles Harbor Department (LAHD) administers the Port of Los Angeles (Port or POLA) under the California Tidelands Trust Act of 1911 and the Los Angeles City Charter. LAHD develops and leases Port property to tenants who operate the facilities. The Port provides a major gateway for international goods and services. The Port includes 23 major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger facilities. In addition to cargo business operations, the Port is home to commercial fishing vessels, shipyards, boat repair facilities, and recreational, community, and educational facilities.

The entire Port, including the proposed Terminal Island Maritime Support Facility (MSF), is part of the United States Department of Transportation designated National Multimodal Freight Network. Under the proposed Terminal Island MSF Project or "Proposed Project," the Project site would be improved and expanded to pave approximately 73 acres and provide approximately 713 ~~net~~ acres of useable space for chassis/empty wheeled container storage that could potentially be used by all 12 container terminals located in the POLA and Port of Long Beach (POLB). These terminals, combined, handle 35 percent of all waterborne containers entering and exiting the entire United States. With the development of this MSF, chassis can be stored off-terminal, allowing for additional storage of containers and increased efficiency on-terminal.

A variable amount of the MSF site area was previously used for the temporary storage of empty containers. See Section 2.6, *CEQA Baseline*, for a discussion of baseline conditions.

2.2.2. Project Overview

The Proposed Project consists of the development and operation of a chassis support facility on an approximately 89.2-acre site, including approximately 71~~3~~ acres of usable space within "the loop" (Figure 2-3). The Proposed Project would construct and install up to two 10-foot by 40-foot office/welfare buildings, four 30-foot-tall canopy structures, eight restrooms, eight guard booths, Maintenance and Repair (M&R) facilities, chassis stalls (i.e., parking spaces), and appurtenant water and electrical infrastructure. The existing vacant Eldridge Street office building (750 Eldridge Street, San Pedro) would also be refurbished to support operations. The chassis support facility could be operated by multiple companies, each of which would likely conduct chassis support operations out of separately built infrastructure. While not certain at this time, it is assumed that multiple companies could operate on the site at once; however, use of the site by a single operator would yield the highest throughput and therefore is the case analyzed. For the purposes of CEQA, the analysis of the Proposed Project is based upon the use of the project site as a chassis support facility and ancillary empty wheeled container storage facility, operated by a single operator. Use of the site by multiple operating companies/tenants or for other maritime support operations, such as wheeled empty container storage (containers left on chassis during storage), would result in fewer daily truck trips to the site. The Proposed Project also involves the storage, repair, and maintenance of chassis as well as the operation of supporting office space(s) including office/welfare buildings and the Eldridge Street office building. The Proposed Project would be operated for up to 25 years.

2.3 Project Objectives

The objectives of the Project are the following:

- issue a Term Permit or Permits for the operations of a chassis support facility or facilities for up to 25 years;
- optimize the use of existing land to support chassis storage;
- reduce inefficient chassis trips: currently, bobtails (truck tractors) are sometimes not able to obtain a chassis in the terminal and need to go to another terminal to retrieve a chassis and then return to the same terminal to retrieve a container, thus resulting in additional inefficient truck trips and vehicle miles traveled;
- provide a full-service depot that would increase the efficiency of terminal operations by providing storage, maintenance, repair, and stop/start functions of chassis, and/or wheeled empty container storage;
- advance POLA's zero-emission cargo-handling equipment goals by requiring their exclusive use at the site by January 1, 2030.

2.4 Project Location and Setting

2.4.1. Regional Setting

The Proposed Project would be located at the Port, on Terminal Island, approximately 20 miles south of downtown Los Angeles (Figure 2-1). The Port encompasses 7,500 acres, including 3,300 acres of water and 43 miles of waterfront. It has approximately 270 commercial berths and 27 terminals, including leased facilities to handle containers, automobiles, dry bulk, breakbulk, and liquid bulk products, as well as cruise ships and extensive transportation infrastructure for intermodal cargo movement by truck and rail. The Port also accommodates boat repair yards and provides slips for 3,800 recreational vessels, 78 commercial fishing boats, 35 miscellaneous types of small-service craft, and 15 charter vessels for sport fishing and harbor cruises. Additionally, the Port accommodates water-dependent recreational, visitor-serving, community, and educational facilities, such as a public beach, the Cabrillo Beach Youth Waterfront Sports Center, Cabrillo Marine Aquarium, Los Angeles Maritime Museum, 22nd Street Park, and Wilmington Waterfront Park.

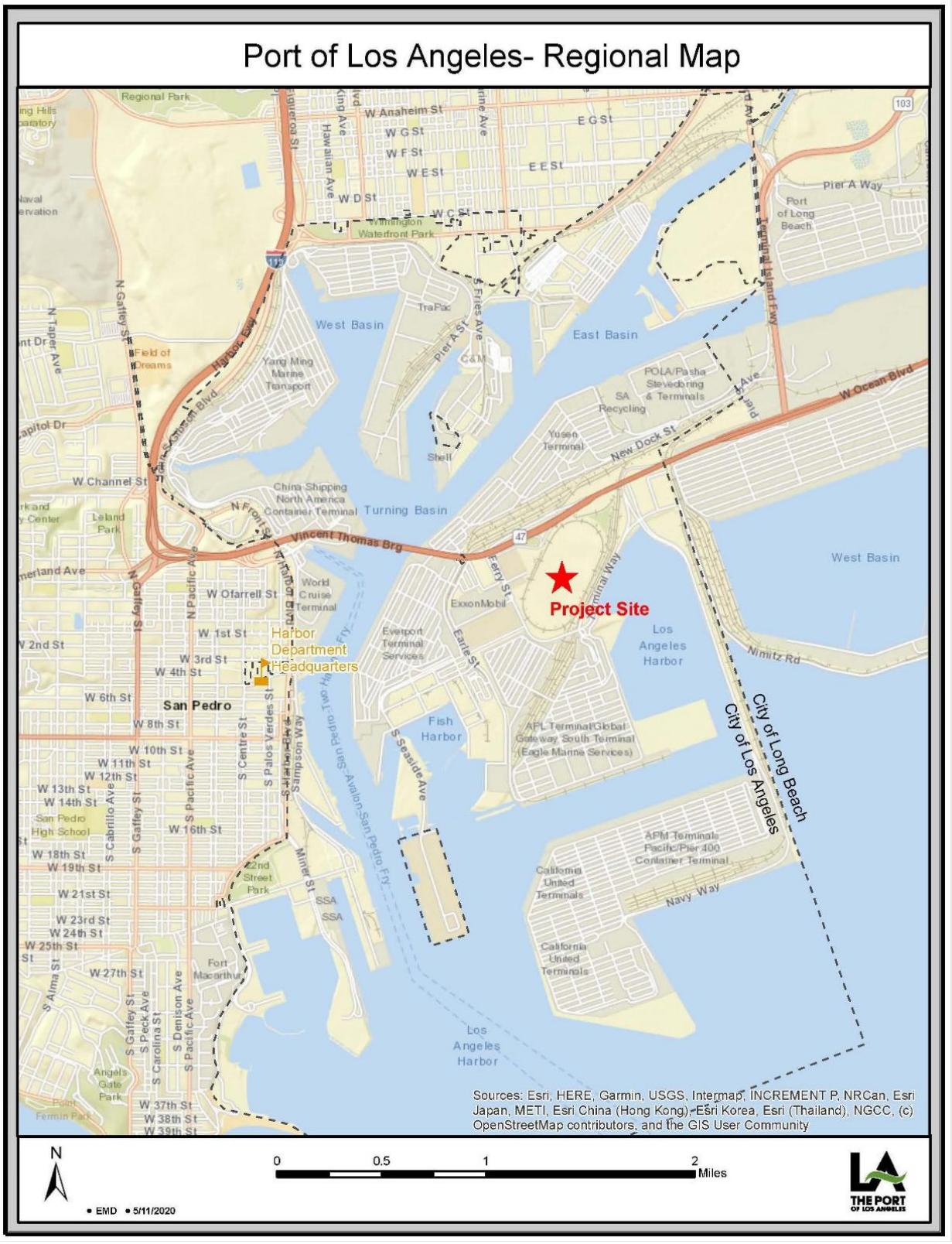
The LAHD, a proprietary department of the City, is charged with the operation, maintenance, and management of the Port. As a landlord, the LAHD leases properties to more than 300 tenants, including private terminal, tug, marine cargo, and cruise industry operators. The LAHD administers operations and projects at the Port under California Constitution Article X, California PRC Section 6306 ("Tidelands Trust Statute"), as granted by the City from the California legislature. The LAHD is therefore chartered to develop and operate the Port in a manner that benefits maritime uses, including the support and access facilities needed to accommodate the demands of import and export waterborne commerce.

2.4.2. Project Site and Surrounding Uses

The Project site is located at 740 Terminal Way, San Pedro, CA 90731. The site is bounded by Navy Way to the east, Ferry Street to the west, Terminal Way to the south, and State Route (SR) 47 to the north (Figure 2-3). The Port will be constructing a rail grade separation roadway to the western end of the site that would serve for site access (Figure 2-3). This grade separation is not part of the Proposed Project and was processed under CEQA and the National Environmental Policy Act through a Categorical Exemption by LAHD on January 2, 2024, and a Categorical Exclusion by the California Department of Transportation on December 27, 2023. The Project site is comprised of approximately 89.2 acres, with three supporting access roads: Terminal Way, Eldridge Street, and Ferry Street. The total acreage to be permitted for use under the Proposed Project is approximately 89.2 acres. Approximately 41.2 acres of the site were previously operated as an empty container storage yard with a roadability center, trailer office space, and guard shacks for security (Section 2.6, *CEQA Baseline*).

Operations staff would work in the existing single-story Eldridge Street office building (750 Eldridge Street, San Pedro), located immediately west and across the street from the Project site. The Eldridge Street office building was originally used as an administrative office for the petroleum coke plant formerly operated by the Los Angeles Export Terminal.

Figure 2-1. Regional Location of the Proposed Project



The site is held in trust by LAHD on behalf of the State of California, is a part of the City of Los Angeles General Plan and governed by the Los Angeles Board of Harbor Commissioners. The Port Master Plan (PMP) establishes policies and guidelines to direct the future development of the Port (LAHD, 2018). The PMP includes five planning areas and establishes the policies and guidelines to direct the future development of the Port pursuant to the California Coastal Act and consistent with The State Tidelands Trust.

The Project site is within Planning Area 3 of the PMP. Planning Area 3 is the largest planning area, consisting of approximately 1,940 acres and more than 9.5 miles of usable waterfront. This planning area focuses on container operations. The Project site is subject to both the Maritime Support and Liquid Bulk land use designations as indicated in the PMP (LAHD, 2018). Of the 89.2-acre site, 23.6 acres are zoned Maritime Support, 53.3 acres are zoned Liquid Bulk, and 12.3 acres are zoned Container, as shown in Figure 2-2. Under the Proposed Project, the land use designation of the ~~site~~ area within "the loop" would be changed to a dual designation of Container and Maritime Support through a PMP amendment (see Final EIR Appendix C, Figure 2). The Project site is on Assessor's Parcel Number (APN) 7440-022- BRK, which is designated General/Bulk Cargo – Non-Hazardous (Industrial and Commercial) and is zoned qualified-heavy industrial ([Q]M3-1) under the City of Los Angeles Zoning Ordinance (City of Los Angeles, 2024).

The Proposed Project is aligned with the California Coastal Act (CCA). The Proposed Project is consistent with Article 2, Chapter 8 of the CCA and ensures that public access and recreational use of the coast is unimpeded while maintaining marine and land resources, including wetlands and environmentally sensitive areas. It does not eliminate or reduce existing commercial fishing harbor space and increases the efficiency of chassis does not involve vessels and therefore would not result in conflicts between vessels. Existing land space within the harbor would be utilized for port purposes. Lastly, the Proposed Project does not fall under any of the appealable categories of development outlined in Section 30715 of the CCA.

The Proposed Project adheres to the CCA guidelines and policies, ensuring that development within the coastal zone is conducted in a manner that protects and enhances coastal resources. A detailed consistency analysis is provided in Final EIR Appendix C.

Figure 2-2. Existing PMP Land Use Designations on the Project Site

Note: Boundaries and associated acreages presented are approximate and based on a conceptual design only.

2.5 Project Description

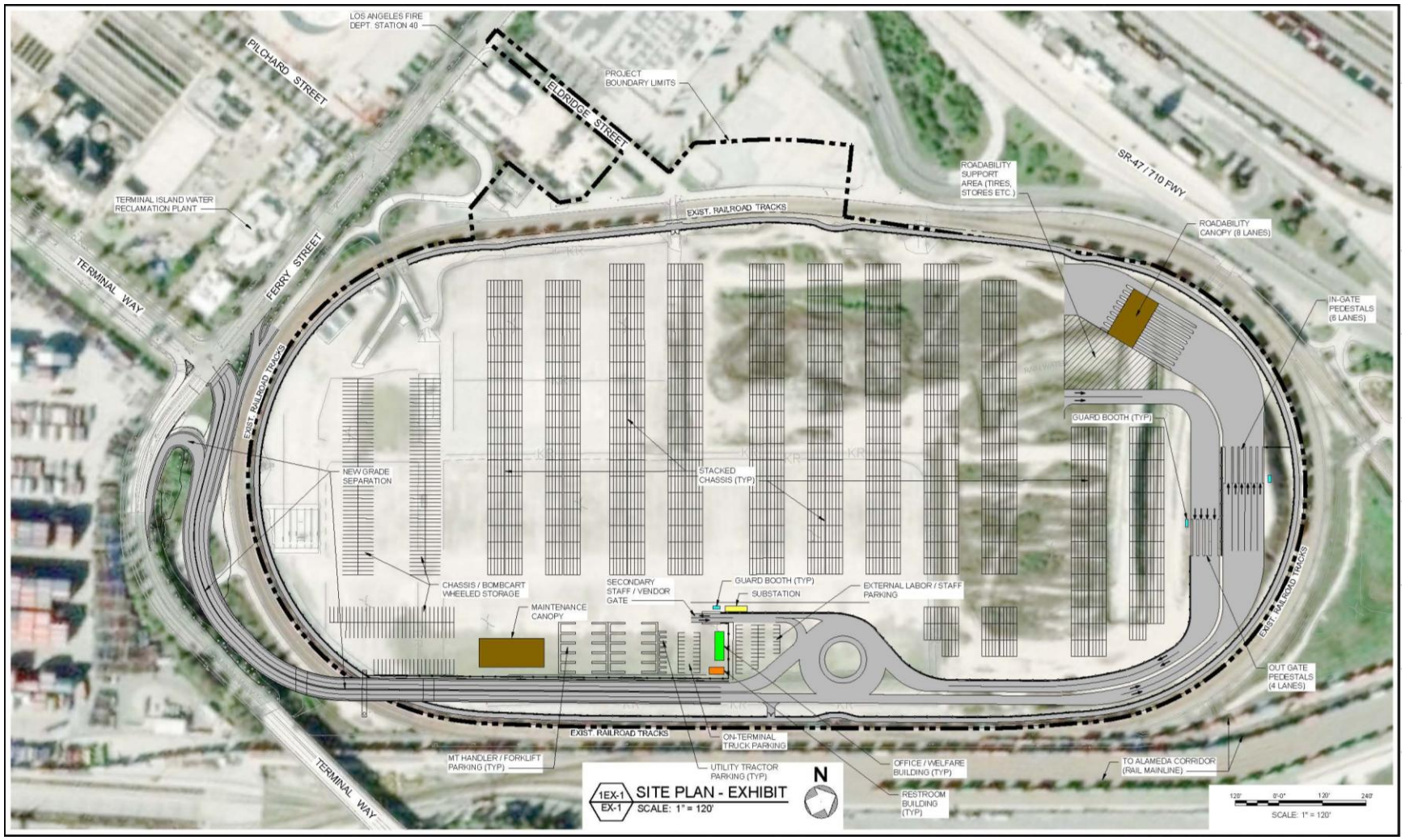
2.5.1. Overview

The Proposed Project includes construction and operation of a chassis support facility, which will provide ancillary support services for marine terminals, which may include operations such as chassis storage/support, and/or wheeled empty container storage on an approximately 89.2-acre site (Figure 2-3).

The site is located at 740 Terminal Way in San Pedro, CA 90731 on Terminal Island in the Port of Los Angeles (POLA or Port). The existing vacant Eldridge Street office building (750 Eldridge Street, San Pedro) would be refurbished to support operations. The Proposed Project would include a PMP amendment to change the land use designation of the area within "the loop" to a dual designation of Container and Maritime Support (see Final EIR Appendix C, Figure 2). Multiple companies could operate on the site at once utilizing separately built infrastructure, including separate charging stations and electric hookups at the site. Chassis support facilities operated by multiple companies would not generate more truck trips than with the site being operated by a single operator. This is because each operator would need to have its own separate infrastructure (such as ingress/egress gates, internal circulation roadways, and electrical infrastructure) which reduces the area available for chassis/wheeled empty container storage and other operational needs. This reduction equates to a reduced overall throughput for the Project site. As such, trucking assumptions are based on a single operator (i.e., worst-case condition).

The environmental review for the Proposed Project primarily assumes use of the site as a chassis support facility to ensure all potentially significant adverse impacts are identified. The site may also be used, entirely or in part, for wheeled empty container storage, in which case the resultant truck traffic (and related impacts) would be less than identified under the primary proposed use (chassis support). The Proposed Project, therefore, only analyzes the entire site being utilized as a chassis support facility, operated by a single operator. This EIR assumes 25 years of operations.

Figure 2-3. Project Site Plan



Note: The site plan presented is based on a single operator, which would result in the highest efficiency and therefore greatest potential air quality, greenhouse gas emissions, and transportation impacts during operations; however, the site may be leased to multiple operating companies/tenants resulting in lower operational impacts. The 'new grade separation' identified on the western border of the Project site is not part of the Proposed Project and was processed under CEQA and the National Environmental Policy Act through a Categorical Exemption by LAHD on January 2, 2024, and a Categorical Exclusion by the California Department of Transportation on December 27, 2023.

2.5.2. Construction

The Proposed Project would include development of the approximately 89.2-acre site for use as a chassis and ancillary empty container storage facility. This chassis support facility may be operated by multiple operating companies/tenants. Proposed construction activities for the site include:

- installation of asphalt concrete to pave approximately ~~75~~ 73 acres of the 89.2-acre site for backland storage use;
- installation of stormwater drainage and sewage systems in compliance with the City of Los Angeles Low Impact Development (LID) Ordinance and City of Los Angeles Bureau of Sanitation (LA Sanitation & Environment) requirements;
- installation of approximately 7,000 linear feet (lf) of chain-link fencing for the perimeter of the site (additional chain link fencing on k-rails would be required to separate areas for different operators, if necessary);
- installation of approximately 3,600 chassis stalls (e.g., parking spaces) at 90 degrees, plus chassis/bombcart wheeled storage stalls, forklift, and utility tractor rig (UTR) parking;
- installation of 40 high mast light poles (maximum height of 100 feet);
- as-needed installation of vaults, switchgears, transformers, associated concrete pads/foundations, and conduit for electrical connections;
- installation of approximately 40 fire hydrants;
- installation of charging and fueling infrastructure;
- construction of a Los Angeles Department of Water and Power (LADWP) substation;
- construction of up to two approximately 10-foot by 40-foot office/welfare buildings;
- installation of up to four corrugated metal M&R canopies;
- construction of up to four approximately 30-foot tall, 16,000 sf, neutral tone steel canopy structures above a concrete foundation for use as roadability canopies~~,~~ with an accompanying roadability support area (roadability center), up to ~~four~~eight approximately 200-sf longshore restrooms, and up to ~~12~~eight approximately 300-sf guard booths; and
- interior modification (e.g., replace carpet, repair utilities, repaint interior, etc.) of an approximately 2,900-square-foot (sf) office building at 750 Eldridge Street that can be shared among multiple operating companies/tenants (existing potable water connection, toilets, sinks, and sanitary sewer are available).

The sewage system would include approximately 3,000 lf of 15-inch vitrified clay pipe. For the Proposed Project's potable water supply, construction would include 11,000 lf of 12-inch ductile iron pipe. Approximately 320,000 gallons of water would be used during construction activities.

Other Project-related construction activities include asphalt concrete repairs, 530,000 lf of four-inch striping, 4,000 sf of operational striping, and operational signage installation on nonexclusive access roads leading to and from the Project site (Figure 2-3). Removal of trees and brush would be performed. Based on the Terrestrial Biological Characterization Survey for the Project site updated in September 2023 by Rincon Consultants, Inc., tree species observed include Australian wattle, Mexican fan palm, lemon-gum eucalyptus, Canary Island pine tree, carrotwood, jacaranda, tree tobacco, willow, Peruvian pepper, Brazilian pepper, and salt cedar (LAHD, 2023a). A total of 239 non-native ornamental individual trees were recorded in the Project area; no protected tree or shrub species were found (LAHD, 2023a). An approximately 3-acre laydown area at the Project site would be utilized during construction. LID water drainage capture infrastructure would be installed as needed throughout the site, including approximately 4,600 lf of 36-inch reinforced concrete pipe (RCP), 4,500 lf of 18-inch RCP, 4,500 lf of 8-inch trench drains, 4,700 lf of longitudinal curb and gutter, 20 catch basins, seven maintenance holes, and storm drain filtration trenches for LID compliance.

The LADWP substation would be constructed to provide expanded electricity supply at the site to support operations. The proposed substation would connect to an existing substation, IS3185, located southwest just outside of the Project site near Ferry Street, using 480-volt (V) electrical lines. Alternatively, a 4,160V line could also be run and then transformed down to 480V closer to the loads.

If electrical lines are routed underground beneath the existing railroad tracks to connect to the existing IS3185 substation, horizontal directional drilling equipment is expected to be used. A timeline of approximately 2 weeks is anticipated if horizontal directional drilling is used under this option. Alternatively, if the electrical lines are routed through the existing tunnel located at the southwest portion of the Project site, trenching would be conducted and would likely take approximately 1 month to complete. The tunnel would be closed to traffic during the temporary trenching activities, with construction access maintained via the at-grade crossing on the north side of the Project site.

Under both scenarios (railroad track routing and tunnel routing), electrical lines would remain underground until they reach the new LADWP substation.

Construction would regrade approximately 60,000 CY of material and require exporting approximately 270,000 CY of material. Excavation depths are expected to be up to 5 feet. The Environmental Baseline Investigation from 2017 indicates generally low levels of contamination in the soil and groundwater within the property, including total petroleum hydrocarbons (TPH), metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs); although, some elevated contaminant levels exceeding environmental screening levels were noted at the site (LAHD, 2017). As such, soil and groundwater at the site are known to be contaminated to varying degrees.

LAHD would conduct additional data collection related to soil vapor, soil, and groundwater contamination to provide additional characterization of the existing site conditions to support the Proposed Project. Given the extent of ground improvement activity, contaminated soils and groundwater would likely be encountered during the course of construction. Accordingly, a ~~s~~Soil ~~m~~Management ~~p~~Plan ~~would be~~has been prepared in accordance with applicable regulatory requirements (Final EIR Appendix D). The plan ~~would be developed by LAHD to~~ directs the management of the specific contaminated media that could reasonably be expected to be encountered at the Project site, and

implementation of the plan would be a permit condition. The plan ~~would~~ identifies~~y~~ known site contaminants, specifies~~y~~ protocols for handling and managing contaminated media, including necessary personnel training, the use of appropriate personal protective equipment for construction personnel, stockpiling and testing of excavated soils for off-site disposal at an appropriate licensed waste disposal facility, or reuse onsite if deemed suitable for industrial land use.~~, and appropriate containment and disposal at appropriate licensed waste disposal facilities.~~

Construction of the Proposed Project would span approximately 24 months. Construction activities would take place between 7:00 a.m. and 4:00 p.m. Monday through Friday and between 8:00 a.m. and 4:00 p.m. on Saturdays, as needed. Up to 60 construction workers would be needed. Temporary construction lighting would be required. While relocation of existing utilities would not be required, new electrical connections and a new LADWP substation would be constructed.

2.5.3. Operation

Under the Proposed Project, a chosen operating company/tenant (or multiple companies/ tenants) would operate a chassis support facility, which could provide chassis storage, M&R facilities, and/or wheeled empty container storage, as noted above. Yard equipment to support operations would include fourteen 30,000-pound forklifts, fourteen 10,000-pound forklifts, and two UTRs. All yard equipment would be required to be zero emissions by January 1, 2030. Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. The Permit/Lease would require a 100 percent transition to zero emissions by January 1, 2030, and any non-conforming equipment would be a breach of the Permit/Lease.

Mobile fuel service trucks would provide diesel and propane for on-site equipment until 100 percent of yard equipment is transitioned to zero emissions by January 1, 2030. Electric charging infrastructure would also be constructed to meet the energy demand of on-site equipment and to meet zero emissions regulations. No additional on-site equipment is anticipated to support Proposed Project operations.

A total of 80 employees is estimated for operation of the Proposed Project in 2029~~2027~~, with approximately 105 employees under full buildout (year 2049~~2046~~) conditions. Additionally, the Proposed Project would comply with the Clean Truck Program (CTP). Only drayage trucks registered in the Ports Drayage Truck Registry or having a day pass would be admitted to the Project site. This would be achieved by installing a Radio Frequency Identification reader(s) at the entrance to the Project site or having a gate attendant confirm truck status to ensure that only drayage trucks compliant with the CTP enter.

When operated entirely as a chassis yard, the MSF would serve up to an estimated 3,682 and 6,838 truck trips per day, under opening year (year 2029~~2027~~) and year 2049~~2046~~ conditions, respectively. These are not new truck trips generated to/from the POLA-POLB within the San Pedro Bay Ports complex. Rather, the MSF merely results in the minor geographic diversion of existing bobtails, as trips are already occurring within the complex. The diversion would direct bobtails to the MSF site to retrieve chassis. The bobtails would then travel to their respective POLA-POLB container terminals. For example, existing westbound bobtail trips on SR 47-Seaside Avenue destined for the adjacent Fenix Marine Services (FMS) terminal in the POLA would proceed to the MSF

via the driveway on Ferry Street to retrieve chassis and then proceed back to the FMS terminal using Ferry Street/Avenue/Terminal Way.

Operations would occur under a new entitlement(s) for up to 25 years.

2.6 CEQA Baseline

To determine whether the Proposed Project or Project alternatives would have significant impacts on the environment, impacts are compared to a baseline condition. The difference between the Proposed Project or Project alternatives and the baseline is then compared to a threshold to determine if the difference between the two is significant.

CEQA provides for an EIR to assess the significance of a project's impacts in comparison to a baseline that consists of the existing physical environmental conditions at and near the project site. Baseline conditions are normally, but not always, measured at the time of commencement of environmental review (i.e., the date of publication of the Notice of Preparation) of the Proposed Project.

State CEQA Guidelines Section 15125(a) provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published, or if no NOP is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

LAHD's normal practice is to define the baseline as the conditions in the first full calendar year preceding publication of the NOP/Initial Study (IS), which was 2023. Since the NOP/IS was released in December 2023, the LAHD has determined that the full calendar year of 2023 serves as the appropriate baseline year for the EIR's CEQA analysis.

In Q1 of 2023, activity within the boundaries of the Project site (Figure 2-3) was comprised of empty container storage. Ancillary empty container storage operations began in 2021 and were operated Monday through Friday from 7:30 a.m. to 4:00 p.m., and 7:30 a.m. to 4:00 p.m. on Saturdays and Sundays as needed. Up to 7,090 containers were stored on the Project site as part of these past operations. The site was operating at full capacity in August 2022, with approximately 600 single gate-in moves (i.e., one gate-in occurs when a full cargo container is delivered to or shipped out of a terminal) occurring during peak operations. A roadability center~~facility~~ is located on site and consists of a corrugated metal shed and k-rail dividers. It was previously operated to verify that chassis were safe for the road. Approximately 11.2 acres were used for administrative purposes and queueing on site, where on-site trailers were used for office and administrative operations by approximately three employees. Guard shacks were also previously used for security at the site. As of Q2 2023, all activity within the boundaries of the Project site (Figure 2-3) has ceased as the site was vacated and is not operated by any entity. The existing conditions for specific resource areas are described in more detail in Chapter 3, *Environmental Analysis*. However, for purposes of defining the Project site's CEQA Baseline, it is considered that annual activities at the Project site during 2023 are primarily negligible and the majority of the baseline year experienced no activity, and operations at the site have ceased. Therefore, the Proposed Project would represent a new use at the site and include the operation of cargo-handling equipment.

2.7 Lead, Responsible, and Trustee Agencies

CEQA defines the "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 for the project and cause the document to be prepared (State CEQA Guidelines §15367). Several other agencies have special roles with respect to the Proposed Project and will use this EIR as the basis for their decisions to issue any approvals and/or permits that might be required. State CEQA Guidelines Section 15381 defines a "responsible agency" as:

> *"…a public agency which 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 which have discretionary approval power over the project."*

Additionally, State CEQA Guidelines Section 15386 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."*

Table 2-1 lists the lead, responsible, and trustee state and local agencies that could rely on this EIR in a review capacity or as a basis for issuance of a permit or other approval for the Proposed Project.

Table 2-1: Agencies That May Use This EIR

Agency	Responsibilities, Permits, and Approvals
State Agencies	
California Coastal Commission (CCC)	Reviews environmental documents to ensure compliance with the federal Coastal Zone Management Act and consistency with the California Coastal Act. CCC certifies the Port Master Plan (PMP) and amendments to ensure Port land uses are consistent with the requirements of the Coastal Act. Under the Proposed Project, the PMP would be amended to create a dual land use designation of Container/Maritime Support for the area within "the loop" as shown in Final EIR Appendix C, Figure 2.
California Air Resources Board	Provides local regulations for criteria air pollutants and coordinates and oversees state and local air pollution control programs in California and implementation of the Clean Air Act.
California Department of Fish and Wildlife, Region 5	Reviews and submits recommendations in accordance with CEQA. Consultation in accordance with the Fish and Wildlife Coordination Act. Issuance of Memoranda of Understanding and permits pertaining to take of state-listed species under the California Endangered Species Act.
State Water Resources Control Board	Permitting authority for Construction General Permit and Industrial General Permit.
California Department of Transportation (Caltrans)	Permitting authority for issuing Encroachment Permit for any Project construction work occurring within or abutting Caltrans right-of-way on State Route 47.
Regional Agencies	
South Coast Air Quality Management District	Provides local regulations for criteria air pollutants and acts as a permitting authority for Permits to Construct and Operate.

Agency	Responsibilities, Permits, and Approvals
Local Agencies	
City of Los Angeles Harbor Department (LAHD)	Lead agency for CEQA and the California Coastal Act for most projects within the Port of Los Angeles area (per the certified PMP). Other City departments (listed below) have various other approval and permitting responsibilities. Pursuant to its authority, LAHD issues permits and other approvals for projects (e.g., entitlements, coastal development permits, harbor engineer permits, leases for occupancy of Port land, approval of operating, and joint venture or other types of agreements for the operation of facilities). LAHD is also responsible for general regulatory compliance and activities of other City of Los Angeles departments.
City of Los Angeles Building and Safety Department	Permitting authority for building and grading permits. Approves, in conjunction with the Bureau of Sanitation, any required Standard Urban Stormwater Mitigation Plans or Site-Specific Mitigation Plans implementing requirements of the MS4 permit issued by Los Angeles RWQCB to the City of Los Angeles.
Los Angeles Department of Transportation	Reviews and approves changes in street design, construction, signalization, signage, and traffic counts within the City of Los Angeles.

1

Chapter 3
Environmental Analysis

Introduction

This chapter describes the framework within which impacts of the Proposed Project and alternatives are evaluated under the California Environmental Quality Act (CEQA) and defines the terminology used in this document. Sections 3.1 through 3.4 in this chapter discuss the possible environmental effects of the Proposed Project and alternatives for each environmental resource area identified by the Los Angeles Harbor Department (LAHD) as having potentially significant impacts in the Initial Study.

The Notice of Preparation and Initial Study (NOP/IS) (see Final EIR Appendix A) for the Proposed Project was issued in December 2023 and was prepared in accordance with the State CEQA Guidelines (14 CCR 15000 et seq.). This Environmental Impact Report (EIR) further examines the various resource areas and State CEQA Guidelines criteria (per Appendix G) that were identified as "potentially significant" based upon the analyses in the 2023 NOP/IS; State CEQA Guidelines issue areas (or criteria) not considered in this EIR were dismissed from further consideration in the IS because there would be either no impacts or impacts would be less than significant.

Sections 3.1 through 3.4 each present the following information for their specific resource area:

- The environmental setting;
- Applicable regulations;
- Impact assessment methodology;
- CEQA baseline;
- Thresholds of significance (i.e., the criteria against which the significance of impacts is judged);
- Impact determinations;
- Mitigation measures;
- Residual impacts;
- Summary of impact determinations;
- Mitigation monitoring; and
- Significant unavoidable impacts.

Terminology Used in This Environmental Analysis

In evaluating the potential impacts of the Proposed Project and alternatives, the significance of an impact is determined by applying the appropriate threshold of significance (significance criterion). The thresholds of significance used to evaluate impacts are described in each of the four resource sections. The following terms are used to describe impacts:

- **No Impact.** A designation of no impact is given when no adverse changes in the environment are expected.
- **Less-Than-Significant Impact.** A less-than-significant impact would be identified when the Proposed Project or alternatives would cause no substantial adverse change in the environment (i.e., the impact would not reach the threshold of significance).
- **Significant Impact.** A significant impact would create a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the Proposed Project or alternatives. Such an impact would exceed the applicable significance threshold established by CEQA but could be reduced to less than significant by the application of mitigation.
- **Mitigation.** Mitigation refers to measures that would be implemented to avoid or lessen potentially significant impacts. Mitigation includes:
    - Avoiding the impact completely by not taking a certain action or parts of an action;
    - Minimizing the impact by limiting the degree or magnitude of the action and its implementation;
    - Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
    - Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or
    - Compensating for the impact by replacing or providing substitute resources or environments.

The mitigation measures would be proposed as conditions of Project approval and would be monitored to ensure compliance and implementation.

- **Residual Impacts.** This is the level of impact after implementation of mitigation measures.
- **Significant Unavoidable Impact**: As required by Section 15126.2(c) of the State CEQA Guidelines, this designation is given when a significant impact would not be reduced to less than significant through any feasible mitigation measure(s).

Requirement to Evaluate Alternatives

State CEQA Guidelines Section 15126.6 requires that an EIR describes a range of reasonable alternatives to the project, or to the location of the project, that could feasibly attain most of the basic project objectives but would avoid or substantially lessen any significant environmental impacts. An EIR should compare merits of the alternatives and determine an environmentally superior alternative. An EIR need not consider every conceivable alternative to a project; rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.

Section 3.1
Air Quality and Health Risk

Section Summary

Section 3.1, *Air Quality and Health Risk*, provides the following:

- A description of existing air quality in the Port of Los Angeles (Port) area;
- A list of local, state, and federal regulations and policies that apply to the Terminal Island Maritime Support Facility (MSF) Project (Proposed Project) and alternatives;
- A discussion of the methodology used to determine whether the Proposed Project or alternatives would result in a significant adverse impact on air quality or increased health risks from air emissions (emission calculations are provided in Final EIR Appendix B1 and B2 – These appendices were updated in the Partially Revised and Recirculated Draft EIR);
- An impact analysis of the Proposed Project and alternatives; and
- A description of mitigation measures proposed to reduce significant adverse impacts of the Project, including reasonably foreseeable direct, indirect and cumulative impacts relating to air quality emissions.

Key Points of Section 3.1

Construction and operation of the Proposed Project would result in emissions of criteria pollutants in the form of off-road construction equipment, construction vehicle exhaust, paving, and operational vehicle exhaust. For the Proposed Project, operational emissions of nitrogen oxides (NOx) would exceed the regional significance threshold, and this impact would remain significant and unavoidable after implementation of mitigation for cargo-handling equipment. Under the No Project Alternative (Alternative 1), no Project-related criteria pollutant emissions would occur. Under the Reduced Project Alternative (Alternative 2), criteria pollutant emission sources would be the same as the Proposed Project, but emissions would be scaled down.

Construction-Related Mass Emissions and Ambient Pollutant Concentration Impacts

Construction of the Proposed Project and the Reduced Project Alternative (Alternative 2) would result in daily mass emissions that are below the South Coast Air Quality Management District (SCAQMD) regional significance thresholds for each of the following criteria pollutants: Nitrogen oxides (NOx), volatile organic compounds (VOC), carbon monoxide (CO), sulfur oxides (SOx), respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM10), and fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less (PM2.5). The Project complies with the 2009 *Los Angeles Harbor Department (LAHD), Sustainable Construction Guidelines* which include control measures requiring construction equipment and practices cleaner than those reflected in an average regional fleet.

Localized ambient air quality impacts from on-site construction activities using the SCAQMD localized significance threshold (LST) methodology (SCAQMD, 2008) show that the estimated maximum on-site daily construction emissions are below the applicable SCAQMD mass-rate LSTs for nitrogen dioxide (NO_2), CO, PM10, and PM2.5. Although the construction emissions would be below the mass-rate LSTs, air dispersion modelling was conducted to confirm that the Proposed Project and alternatives would not contribute substantially to health risks for off-site residences and workers (see "Health Risk Impacts" below).

Operations-Related Mass Emissions and Ambient Pollutant Concentration Impacts

Emissions caused by operation of the Proposed Project and Reduced Project Alternative (Alternative 2) exceed the regional significance threshold for NOx, and depending on feasibility, mitigation would reduce NOx from cargo-handling equipment. Emissions of other air pollutants for the Proposed Project and alternatives would not exceed regional significance thresholds or LSTs.

Health Risk Impacts

Dispersion modeling was completed to screen for the maximum off-site concentrations of toxic air contaminants (TACs) and determine the incremental cancer risk and non-cancer health hazards. Based on this health risk assessment, the impacts during construction and operation of the Proposed Project and alternatives would be less than significant.

3.1.1. Introduction

This section includes a description of the affected air quality environment and predicted impacts from construction and operation of the Proposed Project and alternatives. Emission details and the detailed HRA are provided in ~~Partially Revised and Recirculated Draft~~ Final EIR Appendices B1 and B2, respectively. Comments received on the Notice of Preparation/Initial Study (NOP/IS) during the scoping period include the following:

- Recommend use of SCAQMD's CEQA Air Quality Handbook and website and CalEEMod land use emissions software.
- Recommend use of regional and localized significance thresholds.
- Identify potential adverse air quality impacts from all phases of the Proposed Project.
- Identify feasible mitigation measures for any significant adverse air quality impacts, as well as impacts from mitigation measures.

3.1.2. Environmental Setting

Climate and Meteorology

The Project area is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the SCAQMD. The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined

by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. Light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

Criteria Air Pollutants

The California Air Resources Board (CARB) and the United States Environmental Protection Agency (USEPA) currently focus on the following air pollutants as indicators of ambient air quality: ozone, CO, NO_2, sulfur dioxide (SO_2), PM10, PM2.5, and lead. These pollutants are referred to as "criteria air pollutants" because they are regulated by human health-based and/or environmentally based criteria (science-based guidelines) for setting permissible levels. Levels that are based on preventing injury to human health are called the primary standards, whereas secondary standards set limits intended to prevent environmental and property damage. Extensive health-effects documentation establishes the key effects of these pollutants on human health and welfare (SCAQMD, 2022). Standards have been established for each criteria pollutant to meet specific public health and welfare criteria set forth in the federal Clean Air Act (CAA). The USEPA establishes the federal National Ambient Air Quality Standards (NAAQS) and defines how to demonstrate whether an area meets the NAAQS. California has adopted generally more stringent ambient air quality standards for the criteria air pollutants (referred to as California Ambient Air Quality Standards [CAAQS], or state standards) and has adopted air quality standards for additional pollutants for which there is no corresponding national standard, including sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

The key adverse health and welfare effects of exposure to criteria air pollutants are summarized below (SCAQMD, 2022).

- Ozone: (a) Pulmonary function decrements and localized lung injury in humans and animals; (b) asthma exacerbation; (c) chronic obstructive pulmonary disease (COPD) exacerbation; (d) respiratory infection; (e) increased school absences, and hospital admissions and emergency department (ED) visits for combined respiratory diseases; (e) increased mortality; and (f) possible metabolic effects. Additionally, vegetation damage and property damage.
- Carbon Monoxide (CO): (a) Aggravation of angina pectoris and other aspects of coronary heart disease;,(b) decreased exercise tolerance in persons with peripheral vascular disease and lung disease, (c) possible impairment of central nervous

system functions, (d) possible increased risk to fetuses, (f) possible increased risk of pulmonary disease, and (g) possible emergency department visits for respiratory diseases overall and visits for asthma. Additionally causes visibility reduction.

- PM10 and PM2.5: Short-term: (a) increase in mortality rates, (b) increase in respiratory infections, (c) increase in number and severity of asthma attacks, (d) chronic obstructive pulmonary disease (COPD) exacerbation, (e) increase in combined respiratory-diseases and number of hospital admissions, (f) increased mortality due to cardiovascular or respiratory diseases, (g) increase in hospital admissions for acute respiratory conditions, (h) increase in school absences, (i) increase in lost work days, (j) decrease in respiratory function in children, and (k) increase medication use in children and adults with asthma. Long-term: (a) reduced lung function growth in children, (b) changes in lung development, (c) development of asthma in children, (d) increased risk of cardiovascular diseases, (e) increased total mortality from lung cancer, and (f) increased risk of premature death. Possible link to metabolic, nervous system, and reproductive and developmental effects for short-term and long-term exposure to PM2.5.
- Nitrogen Dioxide (NO_2): Short-term: asthma exacerbations (“asthma attacks”). Long-term: (a) asthma development; (b) higher risk of all-cause, cardiovascular, and respiratory mortality. Both short and long term NO2 exposure is also associated with COPD risk. Potential impacts on cardiovascular health, mortality, and cancer; and aggravate chronic respiratory disease. Contribution to atmospheric discoloration.
- Sulfur Dioxide (SO_2): Respiratory symptoms (bronchoconstriction, possible wheezing or shortness of breath) during exercise or physical activity in persons with asthma. Possible allergic sensitization, airway inflammation, and asthma development.

Toxic Air Contaminants (TACs)

TACs are air pollutants that may lead to serious illness or increased mortality, even when present in relatively low concentrations. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another’s. TACs do not have ambient air quality standards but are regulated by the local air districts using a risk-based approach. Diesel particulate matter (DPM) is classified as a TAC because many toxic compounds adhere to diesel exhaust particles, and statewide programs focus on managing this pollutant through motor vehicle fuels, engine, and tailpipe standards.

Existing Conditions

SCAQMD maintains ambient air quality monitoring stations within the district boundaries that monitor air quality and compliance with associated ambient standards. The Los Angeles Harbor Department (LAHD) also maintains their own monitoring stations, with the closest air quality monitoring station to the Project site being the San Pedro Community station.

Both CARB and USEPA use monitoring data to designate attainment status. The three basic designation categories are nonattainment, attainment, and unclassified. Nonattainment is defined as any area that does not meet, or that contributes to, ambient air quality in a nearby area that does not meet the primary or secondary ambient air quality standard for the pollutant. Attainment is defined as any area that meets the primary or secondary ambient air quality standard for the pollutant. Unclassifiable is defined as any area that cannot be classified based on available information as meeting or not meeting the primary or secondary ambient air quality standard for the pollutant. California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment.

The USEPA currently designates the Basin as a nonattainment area for ozone, PM2.5 (24-hour standard), and lead. However, lead would not be emitted by the Proposed Project because its operations or construction would not use leaded fuels or handle lead-containing materials; therefore, lead is not a pollutant of concern for this EIR. The USEPA currently classifies the Basin as extreme nonattainment for the 8-hour ozone national ambient air quality standard (NAAQS) and serious nonattainment for PM2.5 (24-hour standard). The Basin is in attainment/maintenance of the NAAQS for CO, SO_2, NO_2, and PM10. CARB also designates areas of the state according to whether they meet the CAAQS. CARB currently designates the Basin as a nonattainment area for ozone (considers NOx as an ozone precursor), PM10, and PM2.5. The air basin is in attainment of the CAAQS for CO, SO_2, lead and sulfates, and is unclassified for hydrogen sulfide and visibility reducing particles (CARB, 2022).

Sensitive Land Uses

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered more sensitive to poor air quality than the general public, as population groups associated with these uses have increased susceptibility to respiratory distress. Since people generally spend longer periods of time in their residences, these uses are considered more sensitive to air quality conditions than commercial and industrial uses. Recreational land uses are considered moderately sensitive to air pollution since exercise places a high demand on respiratory functions, which can be impaired by air pollution. There are no nearby residences, schools, or parks within a 1,000-foot radius of the Project site. Barton Hill Elementary School, Cabrillo Avenue Elementary School, Mary Star of the Sea Elementary School, and Port of Los Angeles High School are located at least 1.3 miles from the Project site. The closest sensitive receptors to the Project site are liveaboards in Newmarks Yacht Centre, approximately 1 mile north of the Project site, and residential areas of San Pedro 1.1~~3~~ miles west of the Project site.

3.1.3. Applicable Regulations

3.1.3.1. Federal Regulations

United States Environmental Protection Agency

Federal CAA

The federal CAA of 1969 and its significant amendments (1990) form the basis for the nation's air pollution control effort. The USEPA is responsible for implementing most

aspects of the CAA. A key element of the CAA requires the USEPA to set the health-protective levels of the NAAQS for major air pollutants. The CAA delegates enforcement of the NAAQS in California to the CARB. CARB, in turn, delegates to local air agencies the responsibility of regulating stationary emission sources.

Hazardous Air Pollutants

The USEPA has programs for identifying and regulating hazardous air pollutants (HAPs). Title III of the 1990 CAA Amendments directed the USEPA to promulgate national emissions standards for HAPs (NESHAP). The NESHAP may differ for major sources than for area sources of HAPs. Major sources are defined as stationary sources with potential to emit more than 10 tons per year (tpy) of any HAP or more than 25 tpy of any combination of HAPs; all other sources are considered area sources.

3.1.3.2. State Regulations

California Air Resources Board

California Clean Air Act. Implemented by the CARB, the California CAA establishes broad authority for California to regulate emissions from mobile sources and requires regions to develop and enforce strategies to attain CAAQS. In the Project area, the SCAQMD is responsible for demonstrating how these standards are met.

CARB Off-Road Mobile Sources Emission Reduction Program. The California CAA mandates that CARB achieve the maximum degree of emission reductions from all off-road mobile sources to attain the state ambient air quality standards. Off-road mobile sources include construction equipment. The earliest (Tier 1) standards for large compression-ignition engines used in off-road mobile sources became effective in California in 1996. Since then, the Tier 3 standards for large compression-ignition engines used in off-road mobile sources went into effect in California for most engine classes in 2006. In a 2004 rulemaking, the USEPA established a phase-in of Tier 4 standards for certain "nonroad" engines beginning in 2008, and the Tier 4 or Tier 4 Interim (4i) standards apply to all off-road diesel engines model year 2012 or newer. These standards and standards applicable to fleets that are already in-use address emissions of NOx and particulate matter from diesel combustion.

CARB In-Use Off-Road Diesel-Fueled Fleets Regulation. The regulations for in-use off-road diesel equipment are designed to reduce NOx and toxic DPM from existing fleets of equipment. Depending on the size of the fleet, the owner would need to ensure that the average emissions performance of the fleet meets certain state-wide standards. In lieu of improving the emissions performance of the fleet, electric systems can be installed allowing for the replacement of diesel equipment in the fleet with electric equipment. Presently, all equipment owners are subject to a five-minute idling restriction (13 California Code of Regulations, Chapter 10, Section 2449).

CARB Clean Truck Check Program. Previously known as the Heavy-Duty Inspection and Maintenance program (13 California Code of Regulations, Chapter 3.7, Section 2195), California's Clean Truck Check Program became effective January 1, 2023 and requires almost all non-gasoline heavy-duty vehicles, including vehicles registered outside of California when operating in the State, to report, pay an annual compliance fee, and submit passing emissions tests. This program ensures that trucks comply with targeted NOx and DPM emissions levels.

CARB Advanced Clean Fleets Regulation and Drayage Truck Regulations. The CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach "Clean Truck Program" (CTP) require accelerated implementation of "clean trucks" into the statewide truck fleet. Older trucks that emit more pollution will be replaced with newer, cleaner trucks per these requirements. The average state-wide DPM emissions for Heavy Duty Trucks (HDT) will be reduced due to these regulatory requirements. Successful implementation of these programs depends on the commercial availability of electric and other zero-emission models of medium- and heavy-duty vehicles. In 2020, CARB adopted the Advanced Clean Trucks regulation that requires manufacturers to sell zero-emissions models as an increasing percent of total medium- and heavy-duty sales in California. During 2023 and 2024, CARB issued notices to exercise "enforcement discretion," given that CARB recognized a lack of heavy-duty powertrain availability to comply with the Advanced Clean Fleets regulation and engines to comply with zero-emissions sales requirements. Additionally, on January 13, 2025, CARB withdrew its request to USEPA for a preemption waiver for its Advanced Clean Fleets regulation. As such, the Advanced Clean Fleets regulation is not federally-enforceable.

CARB Portable Equipment Registration Program (PERP). This program allows owners or operators of portable engines and associated equipment commonly used for construction or farming to register their units under a statewide portable program that allows them to operate their equipment throughout California without having to obtain individual permits from local air districts. The engines covered by the PERP also fall under CARB's Portable Equipment Air Toxics Control Measure, which requires the gradual phasing out of older engines in equipment fleets for replacement with those that meet Tier 4 Interim or Final emissions standards.

3.1.3.3. Local Regulations

South Coast Air Quality Management District

Criteria Air Pollutants

The SCAQMD maintains air quality conditions in the Basin through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. SCAQMD also inspects stationary sources of air pollution and responds to citizen complaints; monitors ambient air quality and meteorological conditions; and implements programs and regulations required by the federal and California CAA. Air quality plans applicable to the Proposed Project are discussed below.

Air Quality Management Plan

SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing an air quality management plan (AQMP), which addresses federal and state CAA requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin.

The 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022, and builds upon measures already in place from previous AQMPs (SCAQMD, 2022). It includes a variety of additional strategies such as accelerated deployment of available cleaner technologies (e.g., zero-emission technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 federal 8-hour ozone standard. SCAQMD proposes a total of 49 control measures for the 2022 AQMP, including control measures focused on wide-spread deployment of zero emission and low NOx technologies through a combination of regulatory approaches and incentives.

SCAG is mandated by law to develop a long-term regional transportation and sustain-ability plan every four years. SCAG most recently met this mandate by adopting the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024 SCAG RTP/SCS) in April 2024.

SCAQMD Rules and Regulations

All projects are subject to SCAQMD rules and regulations (SCAQMD, 2023a). Specific rules potentially applicable to the Proposed Project include the following:

Rule 201 – Permit to Construct and Rule 203 – Permit to Operate. A person shall not build, erect, install, alter, or replace, or subsequently operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of stan-dard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating an off-site nuisance. Potentially applicable dust suppression techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 mph or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.
- Sweep on-site streets (and off-site streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment, subject to the conditions specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines. This rule establishes exhaust emissions standards for stationary and portable engines that are rated over 50 brake horsepower.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in Rule 1113.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. To reduce VOC emissions from contaminated soils, including contamination from components of gasoline, diesel, or other petroleum materials, this rule requires notification and monitoring of excavating, grading, handling and treating VOC-contaminated soil. Stockpiles of VOC-contaminated soil must be segregated from non-VOC-contaminated stockpiles.

Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants. This rule reduces off-site fugitive dust emissions that contain toxic air contaminants by reducing particulate emissions caused by earth-moving activities at certain sites that meet applicability requirements of this rule. If applicable, continuous direct-reading near real-time ambient monitoring of PM10 concentrations shall be conducted when on-site earth-moving activities occur, and if monitoring exceeds threshold concentrations of PM10, earthmoving shall cease or other contingency measures shall be implemented.

Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. This rule applies to stationary diesel engines rated over 50 brake horsepower and contains operating requirements and emission standards for new and existing in-use stationary diesel engines, including limits on non-emergency operations.

San Pedro Bay Ports Clean Air Action Plan

In 2017, the Port of Long Beach and Port of Los Angeles adopted the Clean Air Action Plan (CAAP) Update (SPBP, 2017), which outlines strategies to reduce pollution from port-related sources. The CAAP provides guidance for progressing toward a zero-emission future for the Port of Los Angeles (POLA). The CAAP includes strategies to reduce pollution from ships, trucks, trains, harbor craft, and cargo-handling equipment and aims to reduce GHGs from port-related sources to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The CAAP also outlines a 10 in a million excess residential cancer risk for individual port development projects.

Port of Los Angeles Clean Truck Program (CTP)

As part of the San Pedro Bay Ports CAAP, the CTP was established in 2008. The 2017 CAAP Update reflects the early actions taken by the original CTP to comply with State law (SPBP, 2017). The CTP establishes efforts leading to an ultimate goal of a zero-emissions on-road drayage truck fleet by 2035 (SPBP, 2017). All drayage trucks entering port terminals must comply with the State law regulating drayage trucks. Additionally, all drayage trucks entering POLA terminals must comply with the provisions of the POLA Tariff Section 20: Clean Air Action Plan - General Rules & Regulations. As of 2018, new trucks entering the Ports' Drayage Truck Registry (PDTR) must have a 2014 engine model year or newer. Existing trucks already in the PDTR prior to 2018 could continue to operate in the Port. As of April 1, 2022, all combustion engine heavy-duty trucks entering Port terminals are charged a rate to enter with limited exemptions for trucks that are

certified to meet the State's low NOx standard and exemptions for zero-emission trucks.~~As of 2020, following promulgation of the state's near-zero-emission heavy-duty engine standard, all heavy-duty trucks entering Port terminals are charged a rate to enter with exemptions for trucks that are certified to meet the State's near-zero standard or better. Existing trucks already in the PDTR can continue to operate in the Port.~~ The CTP has reduced pollution from harbor trucks by more than 90 percent since its adoption.

Community Emissions Reduction Plan Wilmington, Carson, West Long Beach

The Community Emissions Reduction Plan (CERP) outlines the actions and commitments by the Community Steering Committee (CSC), the SCAQMD, and CARB to reduce air pollution in the Wilmington, Carson, and West Long Beach community (SCAQMD, 2019). The CERP is a critical part of implementing Assembly Bill (AB) 617, and includes targeted actions including developing and enforcing regulations, providing incentives to accelerate the adoption of cleaner technologies, and conducting outreach to provide useful information to the public. Additionally, air monitoring is used in implementation of the CERP to provide information to help guide investigations or provide public information.

City of Los Angeles Green New Deal Sustainable City pLAn

The Port has adopted the City of Los Angeles Sustainable City pLAn (City of Los Angeles, 2019). The Plan contains goals for the city including in areas of local solar, energy efficient buildings, carbon and climate leadership, green jobs, preparedness and resiliency, air quality, and environmental justice. The following targets from the pLAn would be applicable to the proposed Project:

- Reduce vehicle miles traveled per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.
- Reduce port related greenhouse gas (GHG) emissions by 80% by 2050.
- Reduce industrial emissions by 38% by 2035; and 82% by 2050.

City of Los Angeles General Plan

The City of Los Angeles General Plan Health, Wellness, and Equity Element and Air Quality Element (City of Los Angeles, 2021) contains the following objectives and policies related to air quality that are applicable to the Proposed Project:

Objective AQ 1.1	It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan, increase traffic mobility, and sustain economic growth citywide.
Objective AQ 1.3	It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
Policy AQ 1.3.1	Minimize particulate emissions from construction sites.
Policy AQ 1.3.2	Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

	Objective AQ 4.2	It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.
	Policy AQ 4.2.5	Emphasize trip reduction, alternative transit, and congestion management measures for discretionary projects.
	Objective AQ 5.1	It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.
	Policy HW 5.1	Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
	Policy AQ 5.1.1	Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.
	Policy AQ 5.1.2	Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.
	Policy AQ 5.1.4	Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.

3.1.4. Impacts and Mitigation Measures

3.1.4.1. Methodology

All construction- and operation-related emissions are quantified based on the best available forecast of activities, which conservatively assumes construction would begin in 2026~~2025~~ with opening year operations beginning in 2029~~2027~~ and full buildout operations in 2049~~2046~~.[1] This analysis uses the California Emissions Estimator Model (CalEEMod; version 2022.1.1) software developed by the California Air Pollution Control Officers Association (CAPCOA). This is the most recent online version of the CalEEMod software, and it relies upon mobile source emission factors from the CARB OFFROAD2017 inventory and EMFAC2021 models.

Spreadsheet analysis of emissions from diverted truck travel augments the CalEEMod analysis of operational emissions. Truck travel emissions factors are derived for specific travel speeds from the CARB emissions inventory in EMFAC2021 (v1.0.2) for the drayage truck fleet mix (classification: T7 POLA Class 8), in each scenario year. Use of EMFAC2021 conservatively estimates heavy-duty vehicle emissions as this model takes no credit for newer programs, including the Clean Truck Check Program (previously Heavy-Duty Inspection and Maintenance) and the statewide Advanced Clean Trucks and Advanced Clean Fleets regulations that are not yet enforceable.

Where Proposed Project-specific design features are not yet defined, default and typical settings from CalEEMod are used, as published in the CalEEMod User's Guide and supporting appendices (CAPCOA, 2022). Final EIR Appendix B1, Air Quality/GHG Emissions Calculations, provides details on the construction and operational assumptions for the Proposed Project and resulting emissions estimates used in this analysis.

[1] Construction and operational equipment emissions would improve over time as a result of existing regulations, as discussed in Section 3.1.3, *Applicable Regulations*. ~~As such,~~ Generally assuming an earlier construction timeframe ~~(2025)~~ presents a conservatively high emissions result ~~analysis~~. The exact construction dates would be finalized once the Project is approved.

3.1.4.2. CEQA Baseline

State CEQA Guidelines, Section 15125, subdivision (a), provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation and Initial Study (NOP/IS) is published (Final EIR Appendix A). Since the NOP/IS was released in December 2023, the LAHD has determined that 2023 is the baseline year for the CEQA analysis. In 2023, the baseline conditions for the Proposed Project include the existing conditions of the site, which consists of an unoccupied, unused parcel. No construction or operations currently occur. The Proposed Project would represent a new use at the site and generate new chassis storage/support and/or wheeled empty container storage activities at the site, including emissions from both passenger vehicles and trucks.

3.1.4.3. Thresholds of Significance

State CEQA Guidelines Appendix G (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) CEQA Checklist suggests four criteria for determining the significance of impacts related to air quality. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations, which ask whether the Project would:

(a) Conflict with or obstruct implementation of the applicable air quality plan?

(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

(c) Expose sensitive receptors to substantial pollutant concentrations?

(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The NOP/IS (Final EIR Appendix A) eliminated CEQA Checklist item (d) from further consideration. Construction may temporarily cause odors from the use of diesel-powered equipment and vehicles, and odors from operation of the Proposed Project would be caused by the chassis maintenance and repair facilities before the facility fully transitions to zero-emissions equipment by 2030. However, the nearest sensitive receptors are approximately 1 mile away from the Project site, and odors generated during construction and operation would adequately disperse over this distance to levels below objectionable odor levels. As required by Project Feature (PF) AQ-1 (*Zero-Emissions Operational Equipment*), by January 1, 2030, all yard equipment would transition to zero-emissions technology, and zero-emissions equipment would generate no odorous emissions. The impact of odors was determined to be less than significant.

Therefore, the following thresholds (Criteria AQ-1 through AQ-6 defined below) were used to determine significance of air quality impacts of the Proposed Project and alternatives under CEQA. The thresholds are based on the standards established by the City of Los Angeles in the *L.A. CEQA Thresholds Guide* (City of Los Angeles, 2006), which incorporates, by reference, the *CEQA Air Quality Handbook* and associated significance thresholds developed by the SCAQMD (SCAQMD, 2023).

Construction Thresholds

The *L.A. CEQA Thresholds Guide* (City of Los Angeles, 2006) references the SCAQMD *CEQA Air Quality Handbook* (SCAQMD, 1993) for calculating and determining the significance of construction emissions. The SCAQMD significance thresholds are updated as necessary on the district's web page to address new regulations and standards (SCAQMD, 2023).

Construction-related air impacts would be considered significant if:

Criterion AQ-1: Construction of the Project or alternatives would result in peak day emissions that exceed the SCAQMD regional thresholds of significance.

For determining significance, the Proposed Project and Reduced Project Alternative (Alternative 2) peak day construction emissions are compared to the SCAQMD thresholds in Table 3.1-1.

Table 3.1-1: SCAQMD Regional Thresholds for Construction Emissions

Air Pollutant	Emission Threshold (pounds/day
Volatile Organic Compounds (VOC)	75
Nitrogen Oxides (NOx)	100
Carbon Monoxide (CO)	550
Sulfur Oxides (SOx)	150
Particulate matter less than 10 microns (PM10)	150
Particulate matter less than 2.5 microns (PM2.5)	55

Source: SCAQMD, 2023

Criterion AQ-2: Construction of the Project or alternatives would result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance.

For emissions from sites that are near sensitive receptors and are five acres or less, SCAQMD developed the LSTs to evaluate whether a mass emission rate from a project may generate significant adverse localized air quality impacts to nearby off-site sensitive receptors (SCAQMD, 2008). Because the Proposed Project is located on a large site of 89.2 acres, the LSTs do not directly apply; however, this discussion uses the LSTs as a proxy for describing near-field criteria pollutant impacts to off-site receptors. The assessment for off-site ambient air pollutant concentrations in this analysis conservatively includes emissions from on-site and off-site activity for the comparison with LSTs. This approach overestimates the localized concentrations by treating all emissions as if they occur within a relatively small 5-acre site, when in fact, mobile sources would emit from within the larger Project site and on the regional network of roads and highways located off-site. The 5-acre screening lookup table at a receptor distance of 500 meters for Zone 4 – South Coastal LA County was used for construction emissions, as shown in Table 3.1-2.

Table 3.1-2: SCAQMD LST for Construction Emissions (lbs/day)

	NOx	CO	PM10	PM2.5
SCAQMD LST	179	10,198	191	120

Source: SCAQMD, 2009.
Note: Each LST reflects a site area of 5 acres and receptor distance of 500 meters. The Project site is in Source-Receptor Area 4 (South Coastal LA County).

Operational Thresholds

The *L.A. CEQA Thresholds Guide* (City of Los Angeles, 2006) provides specific significance thresholds for operational air quality impacts that also are based on SCAQMD standards (Table 3.1-3). Operations-related air impacts would be considered significant if:

Criterion AQ-3: Operation of the Project or alternatives would result in emissions that exceed the SCAQMD peak day regional emission thresholds of significance.

For determining significance under CEQA, these thresholds are compared to the net change in the Project's operational peak daily emissions relative to CEQA baseline emissions.

Table 3.1-3: SCAQMD Regional Thresholds for Operational Emissions

Air Pollutant	Emission Threshold (pounds/day)
VOC	55
NOx	55
CO	550
SOx	150
PM10	150
PM2.5	55

Source: SCAQMD, 2023.

Criterion AQ-4: Operation of the Project or alternatives would result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance.

The SCAQMD LST also includes criteria pollutant thresholds for operation. As with construction, the 5-acre screening lookup table at a receptor distance of 500 meters for Zone 4 – South Coastal LA County was used, as shown in Table 3.1-4.

Table 3.1-4: SCAQMD LST for Operational Emissions (lbs/day)

	NOx	CO	PM10	PM2.5
SCAQMD LST	179	10,198	46	29

Source: SCAQMD, 2009.
Note: Each LST reflects a site area of 5 acres and receptor distance of 500 meters. The Project site is in Source-Receptor Area 4 (South Coastal LA County).

Criterion AQ-5: The Project or alternatives would expose receptors to significant levels of TACs.

The determination of significance for Criterion AQ-5 is made as follows (SCAQMD, 2023):

- Maximum Incremental Cancer Risk is greater than or equal to 10 in one million;
- Cancer Burden is greater than 0.5 excess cancer cases in areas where the maximum incremental cancer risk for residential receptors is greater than or equal to 1 in one million; and
- Non-cancer Hazard Index is greater than or equal to 1.0 (project increment).

Criterion AQ-6: The Project or alternatives would conflict with or obstruct implementation of an applicable air quality plan.

The consistency of the Proposed Project with an applicable AQMP is assessed qualitatively. The Proposed Project would be considered consistent with the local AQMP and not interfere with attainment goals if the Proposed Project's activities (e.g., throughput, truck trips) are consistent with the projections utilized in the formulation of the 2022 AQMP; in other words, if the Project's activities do not exceed the assumptions in the 2022 AQMP (SCAQMD, 2022).

3.1.5. Impact Analysis

3.1.5.1. Proposed Project

The Proposed Project would result in increased emissions of criteria air pollutants at the Project site associated with construction activities and operation as a chassis storage/support and/or wheeled empty container storage facility. Under the Proposed Project, operation of this MSF as a chassis storage/support facility would result in more truck traffic than as a wheeled empty container storage facility.

Impact AQ-1: Would construction of the Proposed Project result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions?

Construction activities associated with the Proposed Project would result in emissions of CO, VOCs, NOx, SOx, PM10, and PM2.5. Pollutant emissions associated with construction would be generated from the following construction activities: (1) site preparation, grading, and excavation; (2) construction workers traveling to and from the Project site; (3) delivery and hauling of construction supplies to, and debris from, the Project site; (4) fuel combustion by on-site construction equipment; (5) application of architectural coatings and paving. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. In addition, emissions would result from the export of approximately 270,000 cubic yards of soil during the grading phase. Haul trucks would make up to 100 daily round trips during soil export. Approximately 20 percent of haul truck travel distances to export soil could extend up to 200 miles to reach a Port-approved Class I hazardous waste disposal facility in the San Joaquin Valley, while the remaining 80 percent are anticipated to find a disposal site within 50 miles of Terminal Island. Trucks hauling soil exports would therefore travel an average distance of 80 miles per one-way trip.

Construction emissions are short-term and temporary. The phasing of activities appears in the CalEEMod detailed report for construction (Final EIR Appendix B1). The unmitigated maximum daily construction emissions for the Proposed Project were estimated using CalEEMod; and the modeling reflects compliance with SCAQMD Rules 403 and 1113. Table 3.1-5 provides the maximum daily emissions of criteria air pollutants from construction of the Proposed Project compared to the numerical thresholds of significance established by the SCAQMD for emissions of criteria pollutants.

Table 3.1-5: Maximum Daily Unmitigated Construction Emissions, Regional Thresholds

Construction Emissions (lbs/day)						
	VOCs	NOx~~X~~	CO	SOx~~X~~	PM10	PM2.5
Maximum Daily Project Emissions	17.0 ~~17.1~~	90.0 ~~51.2~~	53.0 ~~41.70~~	0.41 ~~0.15~~	46.0 ~~35.0~~	12.0 ~~8.73~~
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	No	No	No	No	No	No

Source: SCAQMD, 2023; Final EIR Appendix B1, Air Quality/GHG Emissions Calculations

Impact Determination

As shown in Table 3.1-5, the maximum daily emissions of criteria air pollutants from construction of the Proposed Project would not exceed the thresholds established by the SCAQMD, and the impact of construction emissions on regional air quality would be less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Residual impacts would be less than significant.

Impact AQ-2: Would construction of the Proposed Project result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance?

Construction emissions for the Proposed Project would occur from sources within the site and on the regional network of roads and highways located off-site. Off-site emissions from the Proposed Project would be generated from construction workers traveling to and from the Project site, delivery of construction equipment and supplies to the Project site, and trucks hauling of export material from the Project site. To determine the potential impact of off-site ambient air pollutant concentrations, the total Proposed Project construction emissions were conservatively considered and compared to the SCAQMD localized significance thresholds.

Impact Determination

Table 3.1-6 shows that total Proposed Project construction emissions would be less than the SCAQMD localized significance thresholds for all pollutants. Most of the construction emissions would occur on the Project site. Off-site emissions resulting from construction vehicle trips would be a fraction of total emissions and would not include the VOC emissions resulting from paving and coatings. Because Proposed Project construction emissions would not exceed the SCAQMD localized significance thresholds, the Proposed Project would result in less-than-significant off-site ambient air pollutant concentrations.

Table 3.1-6: Maximum Daily Unmitigated Construction Emissions, Localized Thresholds

Construction Emissions (lbs/day)				
	NOx	CO	PM10	PM2.5
Maximum Daily Project Emissions	90.0 ~~51.2~~	53.0 ~~41.70~~	46.0 ~~35.0~~	12.0 ~~8.73~~
Localized Significance Threshold	179	10,198	191	120
Exceeds Threshold?	No	No	No	No

Source: SCAQMD, 2023; Final EIR Appendix B1, Air Quality/GHG Emissions Calculations
Note: Each LST reflects a site area of 5 acres and receptor distance of 500 meters. The Project site is in Source-Receptor Area 4 (South Coastal LA County).

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

Impact AQ-3: Would the Proposed Project result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance?

Implementation of the Proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors (NO_X, VOCs) associated with vehicles traveling to the Project site, off-road equipment for cargo handling (on-site), and minor quantities from area sources such as occasional applications of architectural coatings for stall striping.

From a regional perspective, the quantity of new emissions generated by the Proposed Project would depend on whether region-wide vehicle activity increases. While truck trips would access on-site facilities, the Proposed Project would reduce inefficient chassis trips within the POLA and the Port of Long Beach (POLB).

Operational emission calculations assume that the proposed MSF would result in the geographic diversion of truck trips, and that operation of the proposed MSF is not anticipated to cause trips to be newly generated to/from the POLA-POLB. Diverted truck trips include the potential additional vehicle-miles traveled up to 1.87 miles per one-way trip to ~~access the site~~reach the grade separation at the intersection of Ferry Street and Terminal Way, as forecasted by LAHD Goods Movement Division (LAHD, 2023). Each trip would also travel the length of the grade separation and additional segments between ingress/egress gates, chassis stalls, and the roadability center. The emissions caused by the diverted truck trips would therefore occur partially~~mostly~~ off-site and partially on-site. ~~and b~~Based on the site plan's internal circulation and the grade separation design, approximately 1.32~~0.35~~ miles of additional truck travel per one-way trip would occur on site. Emissions estimates for truck idling at the proposed MSF reflect typical idling durations of approximately 20 minutes per visit. This duration is based on the maximum "time on terminal" of 28.2 minutes (0.47 hours) for existing non-container facilities in the POLA emissions inventory (POLA, 2025), minus time for travel (5 minutes) and the roadability inspection (3 minutes) that would occur within this MSF facility (LAHD,

2015).[2] Truck engines would be turned off during roadability inspections, as is common practice at terminals (WBCT, 2025).

To quantify the emissions of regional truck travel, the trucks diverted to the Project site are included in the comparison with the regional significance thresholds. As discussed in the Project Description, truck travel emissions assume the MSF would serve up to 3,682 and 6,838 truck trips per day, under opening year (2029~~2027~~) and full buildout year (2049~~2046~~) conditions, respectively (LAHD, 2023). Prior to full buildout (2049~~2046~~), emissions from the truck trips served by the site would trend towards lower emissions than in the opening year through compliance with the CTP which includes the goals of phasing out older on-road drayage trucks and transitioning to zero-emission on-road drayage trucks by 2035. However, reductions related to CTP compliance are not included in the quantification presented herein.

Calculated regional emissions are provided in Table 3.1-7. Operational activities include emissions from new on-site cargo-handling equipment using diesel-fueled engines certified to meet Tier 4 Final standards in the opening year (2029~~2027~~). Before the full buildout (2049~~2046~~), PF AQ-1 (*Zero-Emissions Operational Equipment*) would require a 100 percent transition of all yard equipment to zero emissions by January 1, 2030, and any non-conforming equipment would be a breach of the Permit/Lease. The opening year also includes the new emissions in the region due to 160 daily one-way worker vehicle trips made by the 80 employees commuting to the MSF site. The full buildout year (2049~~2046~~) includes the emissions due to 210 daily one-way worker vehicle trips made by 105 employees commuting.

Table 3.1-7: Maximum Daily Unmitigated Operation Emissions, Regional Thresholds

Operational Emissions (lbs/day)						
	VOCs	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Opening Year (2029~~2027~~)						
Worker Vehicles (2029~~2027~~)	0.62 ~~0.67~~	0.61 ~~0.69~~	7.10 ~~7.68~~	0.02	1.90 ~~1.91~~	0.49
Cargo-Handling Equipment (2029~~2027~~)	1.90 ~~1.91~~	9.90 ~~9.94~~	101.00	0.19	0.38	0.38
Energy and Area Sources (2029~~2027~~)	1.20	0.05	3.11	< 0.01	< 0.01	< 0.01
Off-site, Truck Trips (2029~~2027~~)	0.18 ~~0.19~~	32.15 ~~33.18~~	5.02 ~~4.79~~	0.24	8.58	1.81
On-site, Truck Trips (2029~~2027~~)	0.32 ~~0.09~~	52.16 ~~14.15~~	7.40 ~~1.89~~	0.23 ~~0.06~~	6.15 ~~1.63~~	1.32 ~~0.35~~
On-site, Truck Idling (2029~~2027~~)	5.43 ~~2.30~~	32.15 ~~14.64~~	53.15 ~~20.40~~	0.07 ~~0.03~~	0.01 ~~0.00~~	0.01 ~~0.00~~
Maximum Daily Operation (2029~~2027~~)	**9.65** **~~6.36~~**	**127.02** **~~72.65~~**	**176.78** **~~138.87~~**	**0.75** **~~0.55~~**	**17.02** **~~12.50~~**	**4.00** **~~3.03~~**
SCAQMD Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	No	**Yes**	No	No	No	No

[2] Existing chassis support facilities at the Port are included in the POLA Emission Inventory, Table 7.2, Non-Container Facility Operating Characteristics, with a maximum "time on terminal" of 0.47 hours (POLA, 2025). Idling is assumed to occur during the remainder of time after subtracting on-site travel time and time for roadability inspection from the total "time on terminal." LAHD Goods Movement Division used data gathered at the Everport Container Terminal to determine a duration of 3 minutes per truck for roadability inspection processing time by calculating the weighted average of all trucks going through pre-inspections and those that received additional processing at the roadability center~~station~~ (LAHD, 2015).

Operational Emissions (lbs/day)						
	VOCs	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Full Buildout Year (2049~~2046~~)						
Worker Vehicles (2049~~2046~~)	0.58 ~~0.59~~	0.49	6.90 ~~6.97~~	0.02	2.40	0.61
Cargo-Handling Equipment (2049~~2046~~)	0.00	0.00	0.00	0.00	0.00	0.00
Energy and Area Sources (2049~~2046~~)	1.20	0.05	3.11	< 0.01	< 0.01	< 0.01
Off-site, Truck Trips (2049~~2046~~)	0.24	41.79 ~~42.41~~	11.61 ~~11.62~~	0.30	15.89 ~~15.90~~	3.30
On-site, Truck Trips (2049~~2046~~)	0.44 ~~0.12~~	69.59 ~~18.68~~	16.20 ~~4.30~~	0.28 ~~0.07~~	11.42 ~~3.02~~	2.41 ~~0.64~~
On-site, Truck Idling (2049~~2046~~)	10.08 ~~4.27~~	59.72 ~~27.18~~	98.70 ~~37.88~~	0.14 ~~0.06~~	0.02 ~~0.01~~	0.02 ~~0.01~~
Maximum Daily Operation (2049~~2046~~)	**12.54 ~~6.42~~**	**171.63 ~~88.81~~**	**136.52 ~~63.88~~**	**0.73 ~~0.46~~**	**29.73 ~~21.33~~**	**6.34 ~~4.56~~**
SCAQMD Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	No	**Yes**	No	No	No	No

Source: SCAQMD, 2023; Final EIR Appendix B1, Air Quality/GHG Emissions Calculations.

Impact Determination

As shown in Table 3.1-7, the Proposed Project's contribution to regional emissions from operational activities would exceed the numerical thresholds of significance established by the SCAQMD for NOx emissions. The impact of operational NOx emissions on regional air quality would be significant.

Project Features and Mitigation Measures

The following Project Feature would be incorporated into the tenant's entitlement to require the use of zero-emission operational equipment by January 1, 2030.

PF AQ-1: Zero-Emission Operational Equipment. All yard equipment would be required to be zero emissions by January 1, 2030. Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. A 100 percent transition to zero emissions by January 1, 2030 shall be required, and any non-conforming equipment used or acquired after this date would be considered a breach of the Permit/Lease conditions.

While PF AQ-1 (*Zero-Emissions Operational Equipment*), would reduce emissions before 2030, additional mitigation would be needed to reduce operational NOx emissions at the start of operation. The largest contributor to operational NOx emissions would be off-site truck travel during operations. Tenants responsible for operations would not likely own or control the truck fleets of future customers using the site. Therefore, the Proposed Project ~~cannot does~~would not have control over ~~determine~~ the technology or composition of the truck fleet that would use the facility.

The statewide Advanced Clean Trucks and Advanced Clean Fleets regulations that are promulgated by CARB, although not yet enforceable, may lead to accelerated turnover of older trucks, as electric or other zero-emission models of heavy-duty vehicles become available to the market in the future. Depending on the availability of these technologies and enforcement of the regulations, a growing fraction of the fleet could become electric or zero-emissions prior to the full buildout year. However, this analysis does not take

credit for this as that fraction is uncertain. Accordingly, controlling truck technologies is not a feasible mitigation.

To reduce operational NOx emissions, MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would require use of zero-emission cargo handling equipment at the start of operations, subject to agreement on feasibility.

MM AQ-1: Zero-Emission Cargo-Handling Equipment. At the start of operation, Tenant shall utilize zero-emission ~~off-road~~ cargo-handling equipment (CHE) for Project operations. If the Tenant determines that specific CHE types cannot feasibly be deployed due to operational or infrastructure constraints, the Tenant shall provide a written report detailing the evidence and supporting documentation concerning feasibility and other relevant factors within 90 calendar days. The feasibility determination shall be subject to mutual agreement between the Board of Harbor Commissioners and Tenant, which shall not be unreasonably withheld by Tenant.

All CHE operated on site shall be zero emissions starting January 1, 2030.

In the event an a~~A~~pplicable l~~L~~aw comes into effect that requires the cargo-handling equipment used on site to be zero-emission equipment, the a~~A~~pplicable l~~L~~aw would govern.

Residual Impacts

Impacts of operational NOx emissions would remain significant and unavoidable.

Impact AQ-4: Would operation of the Proposed Project result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance?

Implementation of the Proposed Project would result in long-term emissions of criteria air pollutants associated with area sources, off-road equipment use, and vehicles traveling to the Project site (additional details provided under Impact AQ-3). To determine the impact to off-site ambient air pollutant concentrations, the operation emissions from trucks transiting within the Project site were included in the comparison to the SCAQMD localized significance thresholds.

The calculated emission rates shown in Table 3.1-8 represent a conservatively high daily rate for on-site emissions by including all off-site activity ~~for employees commuting in the total~~. This approach results in overestimating the localized impacts by presuming all emissions are localized, when in fact emissions would be widely dispersed along all truck travel routes. On-site truck activity would increase localized emissions, due to traffic diverted to the MSF; however, off-site downwind concentrations would be dispersed over the areas of travel and the entire site. Off-site emissions resulting from employee commute trips and worker vehicles would be a fraction of total emissions, as shown in Table 3.1-7.

As shown in Table 3.1-8, the estimated Proposed Project's operational activities would not exceed the numerical LSTs.

Table 3.1-8: Maximum Daily Unmitigated Operation Emissions, Localized Thresholds

Operational Emissions (lbs/day)				
	NOx	CO	PM10	PM2.5
Maximum Daily Operation (2029~~2027~~)	127.02 ~~72.65~~	176.78 ~~138.87~~	17.02 ~~12.50~~	4.00 ~~3.03~~
Maximum Daily Operation (2049~~2046~~)	171.63 ~~88.81~~	136.52 ~~63.88~~	29.73 ~~21.33~~	6.34 ~~4.56~~
Localized Significance Threshold	179	10,198	46	29
Exceeds Threshold?	No	No	No	No

Source: SCAQMD, 2023; Final EIR Appendix B1, Air Quality/GHG Emissions Calculations.
Note: Each LST reflects a site area of 5 acres and receptor distance of 500 meters. The Project site is in Source-Receptor Area 4 (South Coastal LA County).

Impact Determination

Project emissions reported in Table 3.1-8 show total Project operational emissions from all activities including those within the site would be less than the SCAQMD localized significance thresholds. Because on-site operational emissions would not exceed the SCAQMD localized significance thresholds, the Proposed Project would result in less-than-significant off-site ambient air pollutant concentrations.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

Impact AQ-5: Would the Proposed Project expose receptors to significant levels of TACs?

Project emissions of TACs could result in increased off-site health risks to nearby residences and workers. The method for characterizing this impact begins with a screening-level health risk assessment (HRA) that uses Project-specific air dispersion modeling and the CARB Risk Assessment Standalone Tool (RAST) to determine potential off-site risk levels. If the screening levels are exceeded, a full HRA analysis must be conducted.

The health risk impacts of TAC concentrations on sensitive receptors are evaluated in accordance with the 2015 Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Risk Assessment Guidelines (OEHHA, 2015) and SCAQMD Risk Assessment Procedures (SCAQMD, 2017). This analysis considers the potential for the Proposed Project to expose sensitive receptors to TAC concentrations that could cause cancer, chronic, and acute health impacts. The Proposed Project would not involve any notable sources of TAC emissions other than DPM. As such, the screening level HRA considers the Proposed Project's DPM emissions to determine if the on-site emissions could substantially increase off-site concentrations of DPM.

Because activities at the Project site in the baseline are negligible, on-site DPM emissions would increase during construction and operation. The ~~total on-site~~ maximum annual rate of construction-phase DPM emissions would occur during the phases of site preparation

and grading at approximately ~~an average rate of 0.11~~ 0.15 tons per year (tpy) ~~over the period spanning approximately 24 months~~. During operation, Proposed Project activities would create around ~~0.09~~ 0.11 tpy DPM in the opening year (year 2029~~2027~~), and this would trend downward towards lower DPM emissions in full buildout ~~(~~year (2049~~2046~~) conditions with the electrification of cargo-handling equipment and the transition of trucks away from diesel to comply with the CTP as discussed in Impact AQ-3 (see detailed emissions results in Final EIR Appendix B1). On this basis, the operational ~~on-site~~ DPM emissions ~~rate~~ would be ~~much~~ lower than DPM during construction.

There are no sensitive land uses (i.e., homes, hospitals, schools, nursing homes, etc.) near the Project site. The nearest sensitive receptors are liveaboards in Newmarks Yacht Centre, approximately 1 mile north of the Project site, and residential areas of San Pedro 1.1~~3~~ miles west of the site.

For screening potential health risks, the Proposed Project total off-site and on-site DPM emissions were assumed to be emitted on the Project site. This conservatively overpredicts the DPM concentrations near the Project site because off-site sources would emit elsewhere on the regional network of roads and highways. ~~was assumed to permanently increase on-site DPM emissions by up to 0.11 tpy, rather than limiting this level of emissions to the 24-month construction period. This represents a conservatively high assumption because the construction-phase emissions would not permanently continue after opening year, and the operational-phase DPM emissions at the site are estimated to be lower than during construction (Appendix B1).~~

To evaluate downwind DPM concentrations and health risks ~~during construction-phase activities~~, this analysis applies the USEPA-recommended guideline dispersion model, AERMOD (American Meteorological Society/USEPA Regulatory Model). The model relies upon user-specified source parameters for receptor locations and source configuration as user inputs to AERMOD (version 24142). For this analysis, the worst-case ambient downwind concentrations are estimated using a five-year record (2012-2016) of ~~model-ready meteorological conditions from the Long Beach Airport, Daugherty Field~~ AERMOD-ready meteorological data, as compiled by the Port from actual hourly observations collected from January 1, 2012, through December 31, 2016, at the Wilmington Community Station at Saints Peter and Paul School about 2.1 miles north of the Project site. This meteorological data set was processed in 2018 using the most recent version of AERMET at the time (version 16216).

The dispersion modeling analysis solves for maximum concentrations at the specified receptors in terms of micrograms per cubic meter ($\mu g/m^3$). For ~~on-site~~ total DPM emissions ~~up to 0.11 tpy~~ during the first year of construction, the annual average concentration at the maximum impacted residential area would be ~~0.00135~~ 0.00084 $\mu g/m^3$ of DPM, and the annual average concentration would be approximately ~~0.09~~ 0.02232 $\mu g/m^3$ of DPM for off-site workers north of the site boundary.

Maximum Incremental Cancer Risk. The results of the screening-level HRA calculated using RAST (version 22118) determined a worst-case cancer risk of ~~1.17~~ 0.505 in one million for the maximum exposed residential receptor, with a 30-year exposure duration, and ~~5.57~~ 1.38 in one million for off-site worker locations north of the site boundary. These resulting cancer risk levels are below the CAAP threshold and the SCAQMD significance threshold of 10 in one million (SCAQMD, 2023). Details of these calculations are provided in Final EIR Appendix B2, Health Risk Assessment.

Cancer Burden. The zone of impact to the point at which the cancer risk falls below one in one million is ~~approximately~~ less than 1.4 miles (2.25 kilometers) from the Project site. Assuming the default population density of 7,000 persons per square kilometer (SCAQMD, 2017), the estimated cancer burden would be ~~0.112~~ 0.051 excess cancer cases, which is well below the SCAQMD threshold of 0.5 excess cancer cases.

Non-cancer Hazard Index. The worst-case chronic hazard index risks would be ~~0.00027~~ 0.000168 for the maximum exposed residential receptor location and ~~0.018~~ 0.0045 for the worker receptor. The resulting hazard index results are well below the SCAQMD significance threshold of 1.0 for the chronic hazard index. The DPM contaminant does not have an acute health risk reference exposure level; no acute health risk can be calculated, and the acute threshold does not apply to DPM.

The on-site equipment to support chassis depot operations would include zero-emission forklifts and utility tractor rigs (UTRs). However, diesel and propane could also be used for other yard equipment until 100 percent of yard equipment is transitioned to zero emissions by January 1, 2030 per the PF AQ-1 (*Zero-Emissions Operational Equipment*). Compared with on-site heavy-duty truck activity, propane-fueled equipment would contribute to on-site TAC emissions at much lower levels. Speciated TACs from propane use have California approved risk assessment cancer slope or reference exposure level factors for chronic and/or acute health risks that indicate comparably lower potential health risks when compared with those for DPM.

Therefore, the health risks from propane use during the transition to zero emissions would be minimal in relation to the adverse effects of DPM quantified for diesel-fueled truck trips.

Impact Determination

The screening-level HRA of Proposed Project TAC emissions uses dispersion modeling to determine the maximum concentration of DPM for receptors in the Project area. ~~Based on a conservative assumption that the rate of on-site DPM emissions during construction would continue to occur after the 24-month construction period, through the opening year, and remain constant during the life of the Proposed Project, the~~The maximum predicted health impacts would not exceed the SCAQMD significance thresholds for individual cancer risk, population cancer burden, or non-cancer health effects. The Proposed Project construction and operation activities would not expose sensitive receptors to substantial TAC concentrations. This impact would be less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

Impact AQ-6: Would the Proposed Project conflict with or obstruct implementation of an applicable air quality plan?

SCAQMD AQMP Consistency

The SCAQMD's 2022 AQMP is the applicable air quality plan for the Project site. The SCAQMD periodically updates the AQMP, and each iteration identifies specific emission

reduction measures designed to bring the Basin into attainment with the ambient air quality standards. With the 2022 AQMP, SCAQMD proposes a wide range of emissions control measures, including control measures focused on widespread deployment of zero emission and low NOx technologies through a combination of regulatory approaches and incentives. The SCAQMD also adopts AQMP control measures into the SCAQMD rules and regulations, which are then used to regulate sources of air pollution in the Basin. Compliance with these SCAQMD regulations and control programs would ensure that the Proposed Project would not conflict with or obstruct implementation of the AQMP.

Projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG in their RTP/SCS are considered consistent with the AQMP growth projections. Since SCAG's regional growth forecasts are based upon land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections.

The Project site is within Planning Area 3 of the Port Master Plan (PMP) and focuses on container operations. Under the Proposed Project, the site's current PMP land use designation of Maritime Support (26% or 23.6 acres), Liquid Bulk (60% or 53.3 acres), and Container (14% or 12.3) would be changed to a dual designation of Maritime Support and Container through a PMP amendment. The Maritime Support designation provides for water-dependent and non-water-dependent operations necessary to support cargo handling and other maritime activities and represents relatively the lowest intensity land use of the three designations; Liquid Bulk represents the highest intensity land use and accounts for more than half the site. As such, changing the land use designation to Maritime Support/Container would reduce the intensity of land use at the site. As discussed in the IS/NOP, Section 5.11, *Land Use Planning* (see Final EIR Appendix A), the Proposed Project would be consistent with the City of Los Angeles's General Plan land use designation of General/Bulk Cargo – Non-Hazardous (Industrial and Commercial) and qualified-heavy industrial ([Q]M3-1) zoning. The [Q] in this zone restricts uses to General Cargo, limited Port-related commercial, industrial, and support uses. The zone limits the storage of hazardous materials, liquid, or solid bulk that is flammable, explosive, or produces a flammable, toxic, or suffocating gas. The City's General Plan land use designation is relied on for SCAG's regional forecast projections and 2022 AQMP growth projections and would not change. Therefore, the Proposed Project is consistent with the SCAQMD 2022 AQMP.

The City of Los Angeles's General Plan also evaluates the potential of a project to increase the frequency or severity of existing air quality violations. Impacts would occur if the long-term emissions associated with a project would exceed SCAQMD's regional significance thresholds for operation-phase emissions. As detailed in Impact AQ-3, the Proposed Project would cause operational NOx emissions at a level that would exceed the SCAQMD threshold of significance. However, the Proposed Project would improve efficiency in goods movement by providing chassis parking space to reduce inefficient chassis trips and reduce the double handling of empty wheeled shipping containers. Operational emissions from truck travel would be due to the geographic diversion of existing truck travel. Because the operations would modify existing truck trips occurring within the San Pedro Bay Ports complex, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations and would not contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Overall, the Proposed Project would comply with the applicable emission reduction strategies identified in the 2022 AQMP, and, therefore, would not conflict with, nor obstruct, implementation of the AQMP. This impact would be less than significant.

Community Emissions Reduction Plan Wilmington, Carson, West Long Beach

The SCAQMD has prepared the *Wilmington, Carson, West Long Beach Community Emissions Reduction Plan* (CERP) in response to AB 617 (SCAQMD, 2019). The CERP addresses air quality issues and emissions associated with the POLA and POLB and identifies three air quality priorities including zero- and near-zero-emissions technologies, oil tanker leaks, and enforcement of existing CARB regulations. The Proposed Project would be consistent with the CERP as the PF AQ-1 (*Zero-Emissions Operational Equipment*) would require use of zero-emission cargo-handling equipment on the Project site by January 1, 2030; trucks accessing the Project site would be required to be consistent with the Ports' CTP. Therefore, the Proposed Project would not conflict with the CERP.

San Pedro Bay Ports Clean Air Action Plan

The San Pedro Bay Ports CAAP is designed to reduce the health risks posed by air pollution from POLA and POLB related emission sources, including ships, trains, trucks, terminal equipment, and harbor craft. The CAAP encourages freight efficiency and addresses energy resources and contains strategies to reduce emissions from sources in and around the Ports and plans for zero-emissions infrastructure and equipment. The Proposed Project would be consistent with the freight efficiency strategies promoted by the CAAP by providing chassis parking space to reduce inefficient chassis trips and reduce the double handling of empty shipping containers. The Proposed Project would allow trucks to avoid driving further into or from the Port to pick up or drop off chassis with containers. Further, the Proposed Project would support the CAAP's overall goal of promoting zero-emissions goods movement, as PF AQ-1 (*Zero-Emissions Operational Equipment*) would require all on-site yard equipment to transition to zero emissions by January 1, 2030. Additionally, trucks accessing the Project site would be required to adhere to the Ports' CTP, which is a program to achieve the phase-out of diesel trucks and the phase-in of near zero-emission and zero-emission trucks prior to 2035, although reductions related to CTP compliance are not included in the emissions quantified by this analysis.

Impact Determination

Because the Proposed Project would incorporate CAAP control measures and would comply with the applicable AQMP control measures for Port activities, the Proposed Project would not result in an inconsistency with the AQMP, CERP, or the CAAP. Therefore, the Proposed Project would not result in a conflict with, and would not obstruct, implementation of an applicable air quality plan, and impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

3.1.5.2. Alternative 1 – No Project Alternative

Under this alternative, the Project site would remain unused. Like the CEQA baseline, the activities under the No Project Alternative (Alternative 1) are considered negligible in the foreseeable future as no future development has been permitted or approved.

Impact AQ-1: Would construction of the No Project Alternative (Alternative 1) result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions?

In the No Project Alternative (Alternative 1), the Project would not be constructed. Construction phase emissions would not occur.

Impact Determination

Since no construction phase emissions would occur under the No Project Alternative (Alternative 1), there would be no impacts.

Mitigation Measures

Mitigation is not required.

Residual Impacts

There would be no impacts.

Impact AQ-2: Would construction of the No Project Alternative (Alternative 1) result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance?

In the No Project Alternative (Alternative 1), the Project would not be constructed. Construction phase emissions would not occur.

Impact Determination

Since no construction phase emissions would occur under the No Project Alternative (Alternative 1), there would be no impacts.

Mitigation Measures

Mitigation is not required.

Residual Impacts

There would be no impacts.

Impact AQ-3: Would the No Project Alternative (Alternative 1) result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance?

In the No Project Alternative (Alternative 1), the Project would not be constructed. Operation emissions at the site would not occur and the site would remain unused.

Impact Determination

Since no operation phase emissions would occur under the No Project Alternative (Alternative 1), there would be no impacts.

Mitigation Measures

Mitigation is not required.

Residual Impacts

There would be no impacts.

Impact AQ-4: Would operation of the No Project Alternative (Alternative 1) result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance?

In the No Project Alternative (Alternative 1), the Project would not be constructed. Operation emissions at the site would not occur and the site would remain unused.

Impact Determination

Since no operation phase emissions would occur under the No Project Alternative (Alternative 1), there would be no off-site emissions from vehicle travel to and from the site, and there would be no impacts.

Mitigation Measures

Mitigation is not required.

Residual Impacts

There would be no impacts.

Impact AQ-5: Would the No Project Alternative (Alternative 1) expose receptors to significant levels of TACs?

In the No Project Alternative (Alternative 1), the Project would not be constructed. Construction phase emissions would not occur, and operations emissions from vehicle travel would occur as in the baseline conditions.

Impact Determination

Since no construction phase emissions would occur under the No Project Alternative (Alternative 1), there would be no potential for receptors to be exposed to significant levels of TACs, and there would be no impacts.

Mitigation Measures

Mitigation is not required.

Residual Impacts

There would be no impacts.

Impact AQ-6: Would the No Project Alternative (Alternative 1) conflict with or obstruct implementation of an applicable air quality plan?

In the No Project Alternative (Alternative 1), the Project would not be constructed and therefore no conflicts or obstructions with applicable air quality plans would occur. The Project objectives, including those relating to increasing the efficiency of goods movement, would not be achieved.

Impact Determination

Since no construction phase emissions would occur under the No Project Alternative (Alternative 1), there would be no impacts.

Mitigation Measures

Mitigation is not required.

Residual Impacts

There would be no impacts.

3.1.5.3. Alternative 2 – Reduced Project Alternative

Under the Reduced Project Alternative (Alternative 2), the Project site area would be reduced from 89.2 acres to ~~52.7~~ 51.7 acres (~~73~~ 71 acres [usable space]/2 + 16.2 acres other/outside loop), essentially utilizing half the usable space. Construction and operational activities would be identical to the Proposed Project, but with reduced intensity. Less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced Project footprint.

Impact AQ-1: Would construction of the Reduced Project Alternative (Alternative 2) result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions?

In the Reduced Project Alternative (Alternative 2), the usable site area would decrease by half. Since construction activities would be the same, with reduced intensity, the maximum daily emissions associated with the Reduced Project Alternative (Alternative 2) would be similar or slightly less than the Proposed Project. Since the area of the Reduced Project Alternative (Alternative 2) is half that of the Proposed Project, VOC emissions from pavement and striping would be substantially less than the Proposed Project.

Impact Determination

Since construction emissions would be slightly less than the Proposed Project, which are less than significant, impacts of the Reduced Project Alternative (Alternative 2) would also be less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

Impact AQ-2: Would construction of the Reduced Project Alternative (Alternative 2) result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance?

Since construction activities would essentially be the same, but with reduced intensity, the level of off-site ambient air pollutant concentrations during construction would be similar to or slightly less than the Proposed Project.

Impact Determination

Since construction emissions would be slightly less than the Proposed Project, which result in less-than-significant impacts, impacts of the Reduced Project Alternative (Alternative 2) would be less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

Impact AQ-3: Would the Reduced Project Alternative (Alternative 2) result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance?

In the Reduced Project Alternative (Alternative 2), operational emissions would be less than the Proposed Project.

Impact Determination

Operations would be about half that of the Proposed Project given the 50 percent reduction in the operational area. The Proposed Project emissions were below the SCAQMD's daily operational threshold for all criteria air pollutants, except NOx which was estimated to be 127.02 lbs/day in 2029 and ~~88.89~~ 171.63 lbs/day in 2049 (Table 3.1-7). Assuming a proportional decrease based on the site size, emissions of NOx under the Reduced Project Alternative (Alternative 2) would be around 63.51 lbs/day in 2029 and ~~44.45~~ 85.82 lbs/day in 2049, which ~~is below~~ are both above the 55 lbs/day threshold. Therefore, impacts for the Reduced Project Alternative (Alternative 2) ~~are less than~~would be significant.

Project Features and Mitigation Measures

~~No mitigation is required; however,~~As with the Proposed Project, Alternative 2 (Reduced Project Alternative) would require the use of zero-emission operational equipment by January 1, 2030 per ~~Project Feature~~ PF AQ-1 (*Zero-Emission Operational Equipment*). Additionally, MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would be required for reducing NOx emissions under this alternative. See Section 3.1.5.1, *Proposed Project*, under Impact AQ-3, for the full text of ~~the Project Feature~~PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*).

Residual Impacts

Impacts of operational NOx emissions would remain ~~would be less than~~ significant and unavoidable.

Impact AQ-4: Would operation of the Reduced Project Alternative (Alternative 2) result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance?

In the Reduced Project Alternative (Alternative 2), operational emissions would be similar to or slightly less than the Proposed Project. The off-site ambient air pollutant concentrations associated with activity at the site would be similar to or slightly less than the Proposed Project.

Impact Determination

Since impacts would be similar to or less than the Proposed Project, which had less~~-~~than-significant impacts, impacts for the Reduced Project Alternative (Alternative 2) are less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

Impact AQ-5: Would the Reduced Project Alternative (Alternative 2) expose receptors to significant levels of TACs?

In the Reduced Project Alternative (Alternative 2), construction activities would be the same, with reduced intensity, and operational emissions would be similar to or slightly less than the Proposed Project. The potential to expose receptors to significant levels of TACs would be similar to or slightly less than the Proposed Project.

Impact Determination

Since impacts would be similar to or less than the Proposed Project, which had less than significant impacts, impacts for the Reduced Project Alternative (Alternative 2) are less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

Impact AQ-6: Would the Reduced Project Alternative (Alternative 2) conflict with or obstruct implementation of an applicable air quality plan?

In the Reduced Project Alternative (Alternative 2), the Project site area would be reduced while construction and operational activities would be identical to the Proposed Project,

but with reduced intensity. Less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced Project footprint. As the Proposed Project would not conflict with or obstruct implementation of any applicable air quality plans, and the Reduced Project Alternative (Alternative 2) is similar but with decreased intensity, the Reduced Project Alternative (Alternative 2) would also be compatible with applicable air quality plans.

Impact Determination

As with the Proposed Project, the Reduced Project Alternative (Alternative 2) would not result in an inconsistency with the AQMP, CERP, or the CAAP. Therefore, the Reduced Project Alternative (Alternative 2) would not result in a conflict with, and would not obstruct, implementation of an applicable air quality plan, and impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

3.1.5.4. Summary of Impact Determinations

Table 3.1-9 summarizes the CEQA impact determinations of the Proposed Project and alternatives related to Air Quality and Health Risk. This table is meant to allow easy comparison of the potential impacts of the Proposed Project and alternatives. Identified potential impacts may be based on federal, state, or City of Los Angeles significance criteria, LAHD criteria, and the scientific judgment of the report preparers.

For each potential impact, the table provides the CEQA impact determination, applicable mitigation, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

Table 3.1-9: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
Proposed Project	**AQ-1:** Result in emissions that exceed the SCAQMD regional thresholds of significance for construc-tion emissions	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-2: Result in construc-tion off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance	Less Than Significant	Mitigation Not Required	Less Than Significant

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
Proposed Project (Continued)	**AQ-3:** Result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance	Operation emissions would be significant for NOx in all operational years	**PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Significant and Unavoidable
	AQ-4: Result in operational off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-5: Expose receptors to significant levels of TACs	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-6: Conflict with or obstruct implementation of an applicable air quality plan	Less Than Significant	Mitigation Not Required	Less Than Significant
Alt 1 – No Project	AQ-1	No Impact	Mitigation Not Required	No Impact
	AQ-2	No Impact	Mitigation Not Required	No Impact
	AQ-3	No Impact	Mitigation Not Required	No Impact
	AQ-4	No Impact	Mitigation Not Required	No Impact
	AQ-5	No Impact	Mitigation Not Required	No Impact
	AQ-6	No Impact	Mitigation Not Required	No Impact
Alt 2 – Reduced Project	AQ-1	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-2	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-3	Operation emissions would be significant for NOx in all operational years ~~Less Than Significant~~	~~Mitigation Not Required~~ **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Significant and Unavoidable ~~Less Than Significant~~
	AQ-4	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-5	Less Than Significant	Mitigation Not Required	Less Than Significant
	AQ-6	Less Than Significant	Mitigation Not Required	Less Than Significant

3.1.5.5. Mitigation Monitoring

To reduce operational NOx emissions, PF AQ-1 would require a 100 percent transition to zero-emissions yard equipment by January 1, 2030. Additionally, MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would require use of zero-emission cargo-handling equipment at the start of operation, subject to agreement on feasibility.

PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would be applied to the Proposed Project and Reduced Project Alternative (Alternative 2) as a condition of approval. ~~MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*)~~ These would not apply to ~~Alternative 2 (Reduced Project Alternative). Mitigation is not applicable to~~ Alternative 1 (No Project).

Project Feature	**PF AQ-1: Zero-Emission Operational Equipment.** All yard equipment would be required to be zero emissions by January 1, 2030. Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. A 100 percent transition to zero emissions by January 1, 2030 shall be required, and any non-conforming equipment used or acquired after this date would be considered a breach of the Permit/Lease conditions.
Timing	Prior to January 1, 2030.
Methodology	LAHD will include this Project Feature in Permit(s)~~lease agreements~~ with Tenant(s).

Mitigation Measure	**MM AQ-1: Zero-Emission Cargo-Handling Equipment.** At the start of operation, Tenant shall utilize zero-emission ~~off-road~~ cargo-handling equipment (CHE) for Project operations. If the Tenant determines that specific CHE types cannot feasibly be deployed due to operational or infrastructure constraints, the Tenant shall provide a written report detailing the evidence and supporting documentation concerning feasibility and other relevant factors within 90 calendar days. The feasibility determination shall be subject to mutual agreement between the Board and Tenant, which shall not be unreasonably withheld by Tenant. All CHE operated on site shall be zero emissions starting January 1, 2030. In the event an a~~A~~pplicable l~~L~~aw comes into effect that requires the cargo-handling equipment used on site to be zero-emission equipment, the a~~A~~pplicable l~~L~~aw would govern.
Timing	At the start of operations or no later than January 1, 2030 depending on feasibility.
Methodology	LAHD will include this mitigation measure in Permit(s) ~~the permit~~ with Tenant(s).

3.1.6. Significant Unavoidable Impacts

Operational NOx emissions for the opening year or at full buildout would result in a significant unavoidable impact related to air quality ~~and health risk~~ for the Proposed Project and Alternative 2 (Reduced Project Alternative). No other significant unavoidable impacts related to air quality ~~and~~ or health risk would occur for the Proposed Project or alternatives.

Section 3.2
Energy

Section Summary

Section 3.2, *Energy*, provides the following:

- The environmental setting with respect to energy-consumption at the Port of Los Angeles (Port);
- A list of local, state, and federal regulations and policies that apply to the Terminal Island Maritime Support Facility (MSF) Project (Proposed Project) and alternatives;
- A discussion of the methodology used to determine whether the Proposed Project or alternatives would result in a significant adverse impact regarding energy consumption; and
- An impact analysis of the Proposed Project and alternatives.

Key Points of Section 3.2

Energy would be consumed by the Proposed Project and the Reduced Project Alternative (Alternative 2) in the form of electricity and liquid fossil fuels during construction and operation of the facility; however, energy consumption would not be wasteful or done in an inefficient manner such that impacts would be less than significant. There would be no new energy consumption under the No Project Alternative (Alternative 1).

Construction-Related Impacts

During construction, liquid fuels (diesel and gasoline) would be used to power construction vehicles and off-road equipment. Electricity usage during construction would be negligible. Construction would be required by means of a Project Feature to comply with the *Port of Los Angeles Sustainable Construction Guidelines.* The Proposed Project and alternatives would not use non-renewable energy resources in a wasteful or inefficient manner during construction, and impacts related to energy use and conservation would be less than significant.

Operations-Related Impacts

During operations, with the Project Feature (PF) AQ-1 and mitigation measure (MM) AQ-1 electricity would be used to power several on-site electric forklifts, utility tractor rigs (UTRs), and for general facility lighting and operations. Diesel would be used by visiting heavy duty trucks. Operational energy use by the Proposed Project and alternatives is projected to become slightly more efficient over time in response to increasing energy costs and the transition to zero-emission technologies, which can be expected to encourage additional conservation, and also in relation to compliance with federal, state, and local energy regulations and programs, which can be expected to result in the introduction of more energy-efficient equipment and transport. The Proposed Project and alternatives would not use

non-renewable energy resources in a wasteful or inefficient manner during operation, and impacts would be less than significant.

3.2.1. Introduction

This section describes the energy consumption and conservation elements of the Proposed Project and identifies potential impacts related to energy use that would occur as a result of implementation of the Proposed Project or alternatives. The alternatives include the No Project Alternative (Alternative 1) and the Reduced Project Alternative (Alternative 2).

The Proposed Project would develop an approximately 89.2-acre site for use as a chassis support facility. The chassis support facility may be operated by multiple operators, with up to 3,682 truck trips per day in the opening year (2029) and up to 6,838 truck trips per day at full buildout (2049) and on-site equipment including up to 28 electric forklifts and two utility tractor rigs (UTRs).

The three features related to energy are: (1) energy used to construct the facility, (2) energy from truck travel and worker vehicle trips during operation, (3) energy used by onsite equipment and occupation of the refurbished office during operation.

No comments related to energy were received on the Notice of Preparation/Initial Study (NOP/IS) during the scoping period.

3.2.2. Environmental Setting

The Los Angeles Department of Water and Power (LADWP) provides electrical services to a service territory of approximately 473 square miles that is home to four million residents, the Port, and the Proposed Project. Pursuant to Senate Bill 350 (De León, Chapter 547, Statutes of 2015), LADWP must develop and maintain an integrated resource plan (IRP) that describes how the utility will meet their energy and capacity resource needs while achieving policy goals and mandates. The IRP relies on electricity system planning studies, which ensure that LADWP has adequate generation capacity to serve the Port's current load requirements. The IRP also shows how LADWP will meet certain requirements, targets, and goals, including greenhouse gas (GHG) emission reduction targets and renewable energy procurement requirements identified in Public Utilities Code (PUC) Section 9621.

Currently, renewable energy sources account for approximately one-third of LADWP's capacity (Table 3.2-1). This is expected to increase over time based on Senate Bill (SB) 100 which established that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by 2045 through the Renewables Portfolio Standard (RPS).

Table 3.2-1: Energy Sources of Electricity Supplied to Customers (Power Content)

Energy Resources	LADWP (2023)	2023 California-wide Power Mix
Renewable		
Biomass & biowaste	0.1%	2.1%
Geothermal	9.5%	4.8%
Eligible hydroelectric	2.4%	1.8%
Solar	14.0%	17.0%
Wind	13.5%	11.2%
Eligible Renewable Total	**39.5%**	**36.9%**
Nonrenewable		
Coal	10.3%	1.8%
Large Hydroelectric	3.9%	11.7%
Natural Gas	32.4%	36.6%
Nuclear	13.9%	9.3%
Other	0.0%	0.1%
Unspecified sources of power *	0.0%	3.7%
Total	**100.0%**	**100.0%**

Sources: CEC, 2024.
* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

3.2.3. Applicable Regulations

Numerous federal, State, and local laws have been established to regulate energy conservation and efficiency. Responsibilities for enforcing or executing these laws and regulations are governed by various state and local agencies, as described below.

3.2.3.1. Federal Regulations

Federal energy policy sets standards for energy and conservation through efficiency standards applicable to appliances and products, fuel economy standards, and fuel production standards. No federal regulations concerning wasteful, inefficient, or unnecessary consumption of energy resources were identified to specifically apply to the Project.

3.2.3.2. State Regulations

California Building Energy Efficiency Standards (Energy Code)

New construction, along with additions or alterations to existing buildings, is subject to the Energy Code (California Code of Regulations, Title 24, Part 6). The Energy Code applies to building products and designs, including mechanical systems and lighting, and serves to reduce wasteful and unnecessary uses of energy statewide. Voluntary energy efficiency provisions appear in the California Green Building Standards Code, also known as CALGreen (Title 24, Part 11). The Building Energy Efficiency Standards are

updated every three years. These energy conservation standards mandate energy-efficient building and infrastructure requirements that apply to the Project.

Senate Bill 350, Clean Energy and Pollution Reduction Act of 2015

Senate Bill 350, enacted on October 7, 2015, provides a new set of objectives in clean energy, clean air, and pollution reduction. The objectives include increasing the procurement of California's electricity from renewable sources from 33 percent to 50 percent by December 31, 2030, and doubling the energy efficiency savings in electricity and natural gas final end uses of retail customers by 2030.

State CEQA Guidelines

The California Natural Resources Agency adopted certain amendments to the State CEQA Guidelines effective in 2019, to change how CEQA Lead Agencies consider the environmental impacts of energy use. CEQA Guidelines Section 15126.2(b) and Appendix F require analysis of a project's energy use, in order to assure that energy implications are considered in project decisions. CEQA requires a discussion of the potential environmental effects of energy resources used by projects, with particular emphasis on avoiding or reducing the "wasteful, inefficient, and unnecessary consumption of energy" (see Public Resources Code section 21100(b)(3)).

3.2.3.3. Local Regulations

Sustainable City pLAn/Green New Deal

The Port has adopted the City of Los Angeles Sustainable City pLAn (City of Los Angeles, 2019). The Plan contains goals for the city in areas including local solar, energy efficient buildings, carbon and climate leadership, green jobs, preparedness and resiliency, air quality, and environmental justice. The following targets from the pLAn would be applicable to the Project:

- Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.
- Reduce port related GHG emissions by 80% by 2050.
- Reduce industrial emissions by 38% by 2035; and 82% by 2050.

Port of Los Angeles Green Building Policy

In 2007, the Los Angeles Board of Harbor Commissioners (BHC) adopted the Green Building Policy requiring Leadership in Energy and Environmental (LEED) Gold Rating as the minimum standard for new construction of most buildings of at least 7,500 square feet as well as the incorporation of solar power and best available technology for energy efficiency for all new Port buildings.

3.2.4. Impacts and Mitigation Measures

3.2.4.1. Methodology

Equipment used during construction and operation would consume various forms of energy (e.g., electricity, propane, gasoline, diesel). This analysis presents a quantitative discussion of the Project's energy use for construction and operation components, relative

to energy supplies. As set forth in the State CEQA Guidelines, Appendix F: Energy Conservation, the goal of conserving energy implies the wise and efficient use of energy including:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
- Increasing reliance on renewable energy sources.

The energy impact analysis emphasizes avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy resources, and whether the Project would result in a potentially significant environmental impact due to inefficient, wasteful, and unnecessary consumption of energy resources. State CEQA Guidelines, Section 15126.2(b) requires the analysis to focus on energy use that is caused by the project. If analysis of the project's energy use reveals that the project may result in significant environmental effects due to inefficient, wasteful, or unnecessary use of energy, then the analysis must identify ways to mitigate that energy use.

3.2.4.2. CEQA Baseline

State CEQA Guidelines, Section 15125, subdivision (a), provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation and Initial Study (NOP/IS) is published (Final EIR Appendix A). Since the NOP/IS was released in December 2023, the LAHD has determined that 2023 is the baseline year for the CEQA analysis. In 2023, the baseline conditions for the Proposed Project include the existing conditions of the site, which consist of an unoccupied, unused parcel. No construction or operations currently occur. The Proposed Project would represent a new use at the site and generate new chassis storage/support and/or wheeled empty container storage activities at the site, which would result in increased energy consumption.

3.2.4.3. Thresholds of Significance

State CEQA Guidelines Appendix G (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) CEQA Checklist suggests two criteria for determining the significance of impacts related to energy:

Would the Project:

(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during construction or operation?

(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The NOP/IS (Final EIR Appendix A) eliminated criteria (b) from further consideration on the basis that the Proposed Project's compliance with applicable standards, regulations, and policy guidance would mean that it would likely not conflict with or obstruct state or local plans or policies related to energy efficiency. Accordingly, the Proposed Project and alternatives would have a significant impact if it would:

EN-1: Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during construction or operation.

3.2.5. Impact Analysis

3.2.5.1. Proposed Project

The Proposed Project would result in energy consumption associated with construction activities and operation as a chassis storage/support and/or wheeled empty container storage facility.

Impact EN-1: Would the Proposed Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during construction or operation?

Construction

Construction activities would consume nonrenewable energy resources, primarily petroleum-based transportation fuels (diesel and gasoline), and grid electricity where available, to power construction equipment and vehicles. The short-term use of fuels by equipment and motor vehicle trips during construction would be necessary to install the facility. The total energy requirements during construction are not quantified within the Project Description. However, the use of nonrenewable resources can be estimated in terms of the volumes of diesel and gasoline, by reviewing the products of combustion of these fuels (e.g., the quantities of greenhouse gases would be directly proportional to the volumes of fuels used). Based on the anticipated quantities of carbon dioxide-equivalent (CO_2e) emissions estimated as ~~3,291~~ 7,046 metric tons (MT) of CO_2e (see Section 3.3, *Greenhouse Gas Emissions*), approximately ~~322,442~~ 690,346 gallons of diesel fuel is estimated to be used for Proposed Project construction over approximately 24 months.[1]

To put these volumes into perspective, data from the California Energy Commission (CEC) indicates that California's refineries normally produce around 1.3 million barrels per week of diesel and 6.0 million barrels per week of gasoline (CEC, 2023). In comparison, the total diesel fuel volume used during the entirety of Proposed Project construction (~~322,442~~ 690,346 gallons or ~~7,677~~ 16,437 barrels) would represent about ~~0.6~~ 1.3 percent of California's typical weekly production of diesel. Consumption of energy resources during construction facilitates achieving the Project objectives, including those relating to increasing the efficiency of goods movement, and therefore, would not be wasteful, inefficient, or unnecessary.

Operation

Maintenance and normal operations of the Proposed Project would require use of fossil fuels (diesel and gasoline) for motor vehicle trips. Transportation fuels would be used for 80 employees in the opening year (2029), and up to 105 employees in the buildout year (2049~~2046~~), commuting to the Project site. Overall use of energy for operation-phase truck trips would be caused by the Proposed Project diverting truck trips to the site. The equivalent volume of diesel fuel that would be consumed per year can be estimated from the peak yearly rate of GHG emissions, ~~excluding~~ although the electricity supply~~, which~~ is derived from a mix of resources that does not include diesel, as shown in Table 3.2-1. Based on ~~9,175~~ 15,630 ~~metric tons of~~ MTCO_2e per year~~,~~ for the ~~opening~~ full buildout

[1] The volume of diesel fuel used can be approximated from an emission factor of 10.2 kg CO_2 per gallon, based on the fuel heating value (0.138 million British thermal units per gallon) multiplied by the default CO_2 emission factor (73.96 kg CO_2 per million British thermal unit), in Table 2-3 of Title 17, California Code of Regulations, Section 95115.

year (from Section 3.3, *Greenhouse Gas Emissions*, Table 3.3-1), amortized construction plus Project operations, including electricity use, would require approximately ~~898,939~~ 1,531,400 gallons or ~~21,403~~ 36,460 barrels of diesel fuel annually. This annual amount represents about ~~1.7~~ 2.8 percent of California's typical weekly production of diesel.

The forklifts, UTRs, and any other support equipment used onsite would initially use diesel and/or propane until 100 percent of yard equipment is transitioned to zero emissions (by January 1, 2030) as required by Project Feature (PF) AQ-1 (*Zero-Emissions Operational Equipment*). Approximately 80 to 105 employees would consume minor amounts of electrical energy at the facility, including the refurbished office, and no induced population growth would occur. Accordingly, no notable change in long-term consumption of non-renewable energy resources would occur with the Proposed Project.

The consumption of energy resources during operation of the Proposed Project would not be wasteful, inefficient, or unnecessary. Proposed Project operation would have a less-than-significant impact on local or regional energy supplies and energy resources.

Impact Determination

The Proposed Project would not result in wasteful or inefficient consumption of energy resources. This impact would be less than significant, and no mitigation is required.

Mitigation Measures

While no mitigation is required to reduce the energy impact, the Proposed Project would require the use of zero-emission operational equipment to reduce air pollutant emissions ~~by January 1, 2030~~ per the following Project Feature and mitigation measure introduced in Section 3.1, *Air Quality and Health Risk*. ~~, which would improve energy efficiency.~~ Furthermore, LAHD identified a mitigation measure for GHG emissions (MM GHG-1, see~~in~~ Section 3.3, *Greenhouse Gas Emissions*); however, implementing a Project requirement to purchase and retire carbon offsets would not likely change the Project's consumption of energy resources.

PF AQ-1: Zero-Emission Operational Equipment. All yard equipment would be required to be zero emissions by January 1, 2030. Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. A 100 percent transition to zero emissions by January 1, 2030 shall be required, and any non-conforming equipment used or acquired after this date would be considered a breach of the Permit/Lease conditions.

Additionally, MM AQ-1 identified for air quality impacts in Section 3.1, *Air Quality and Health Risk*, would ~~provide for~~require early electrification of cargo-handling equipment, depending on feasibility, which may also improve the energy efficiency of operations.

MM AQ-1: Zero-Emission Cargo-Handling Equipment. At the start of operation, Tenant shall utilize zero-emission ~~off-road~~ cargo-handling equipment (CHE) for Project operations. If the Tenant determines that specific CHE types cannot feasibly be deployed due to operational or infrastructure constraints, the Tenant shall provide a written report detailing the evidence and supporting documentation concerning feasibility and other relevant factors within 90 calendar days. The feasibility determination shall be subject to mutual agreement between the Board of Harbor Commissioners and Tenant, which shall not be unreasonably withheld by Tenant.

All CHE operated on site shall be zero emissions starting January 1, 2030.

In the event an a~~A~~pplicable l~~L~~aw comes into effect that requires the cargo-handling equipment used on site to be zero-emission equipment, the a~~A~~pplicable l~~L~~aw would govern.

Residual Impacts

Impacts would be less than significant.

3.2.5.2. Alternative 1 – No Project Alternative

Under this alternative, the Project site would remain unused. Like the CEQA baseline, the activities under the No Project Alternative (Alternative 1) are considered negligible in the foreseeable future as no future development has been permitted or approved.

Impact EN-1: Would the No Project Alternative (Alternative 1) result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during construction or operation?

In the No Project Alternative (Alternative 1), the Project would not be constructed. Construction and operation emissions and energy use would not occur. The Project objectives, including those relating to increasing the efficiency of goods movement would not be achieved.

Impact Determination

Since no construction phase emissions would occur under the No Project Alternative (Alternative 1), there would be no impacts.

Mitigation Measures

No mitigation is required.

Residual Impacts

No impacts would occur.

3.2.5.3. Alternative 2 – Reduced Project Alternative

In the Reduced Project Alternative (Alternative 2), the Project site area would be reduced from 89.2 acres to ~~52.7~~ 51.7 acres (71 acres [usable space]/2 + 16.2 acres other/outside loop), essentially utilizing half of the usable space. Construction and operational activities would be identical to the Proposed Project, but with reduced intensity. Less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced Project footprint.

Impact EN-1: Would the Reduced Project Alternative (Alternative 2) result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during construction or operation?

In the Reduced Project Alternative (Alternative 2), the usable site area would decrease by half. Since the area of the Reduced Project Alternative (Alternative 2) is half that of the

Proposed Project and since construction activities would be the same, with reduced intensity, the total energy use associated with construction of the Reduced Project Alternative (Alternative 2) would be less than the Proposed Project. Operational energy use would also be reduced when compared to the Proposed Project.

Impact Determination

Since construction energy use would be slightly less than the Proposed Project, and operation energy use would be reduced, impacts would be less than the Proposed Project. Neither construction nor operation would result in wasteful or inefficient consumption of energy resources, and impacts would be less than significant.

Mitigation Measures

No mitigation is required for the Reduced Project Alternative (Alternative 2); however, energy efficiency would be improved with implementation of Project Feature PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*). See Section 3.2.5.1, *Proposed Project*, under Impact EN-1, for the full text of this measure.

Residual Impacts

Impacts would be less than significant.

3.2.5.4. Summary of Impact Determinations

Table 3.2-2 summarizes the CEQA impact determinations of the Proposed Project and alternatives related to Energy. This table is meant to allow easy comparison of the potential impacts of the Proposed Project and alternatives. Identified potential impacts may be based on federal, state, or City of Los Angeles significance criteria, LAHD criteria, and the scientific judgment of the report preparers.

For each potential impact, the table provides the CEQA impact determinations, applicable mitigation, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

Table 3.2-2: Summary Matrix of Potential Impacts and Mitigation Measures for Energy

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
Proposed Project	**EN-1:** Wasteful, inefficient, or unnecessary consumption of energy resources	Less Than Significant	Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Less Than Significant
Alt 1 – No Project		No Impact	Mitigation Not Required	No Impact

Alternative	Environmental Impacts	Impact Determination	Applied Project Features/Mitigation Measures	Residual Impacts
Alt 2 – Reduced Project		Less Than Significant	Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Less Than Significant

3.2.5.5. Mitigation Monitoring

No mitigation is required to reduce the energy impact. However, PF AQ-1 would improve energy efficiency by requiring a 100 percent transition to zero-emissions yard equipment by January 1, 2030. To further improve energy efficiency, MM AQ-1 would provide for early electrification of cargo-handling equipment, depending on feasibility.

PF AQ-1 and MM AQ-1 would be applied to the Proposed Project and Alternative 2 (Reduced Project Alternative) as a condition of approval. ~~PF AQ-1 would also be applied to Alternative 2 (Reduced Project Alternative) as a condition of approval.~~ The Project Feature and ~~Mitigation~~ mitigation is not applicable to Alternative 1 (No Project) ~~or Alternative 2 (Reduced Project Alternative)~~.

Project Feature	**PF AQ-1: Zero-Emission Operational Equipment.** All yard equipment would be required to be zero emissions by January 1, 2030. Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. A 100 percent transition to zero emissions by January 1, 2030 shall be required, and any non-conforming equipment used or acquired after this date would be considered a breach of the Permit/Lease conditions.
Timing	Prior to January 1, 2030.
Methodology	LAHD will include this Project Feature in ~~lease agreements~~Permit(s) with Tenant(s).

Mitigation Measure	**MM AQ-1: Zero-Emission Cargo-Handling Equipment.** At the start of operation, Tenant shall utilize zero-emission ~~off-road~~ cargo-handling equipment (CHE) for Project operations. If the Tenant determines that specific CHE types cannot feasibly be deployed due to operational or infrastructure constraints, the Tenant shall provide a written report detailing the evidence and supporting documentation concerning feasibility and other relevant factors within 90 calendar days. The feasibility determination shall be subject to mutual agreement between the Board and Tenant, which shall not be unreasonably withheld by Tenant. All CHE operated on site shall be zero emissions starting January 1, 2030. In the event an a~~A~~pplicable l~~L~~aw comes into effect that requires the cargo-handling equipment used on site to be zero-emission equipment, the a~~A~~pplicable l~~L~~aw would govern.
Timing	At the start of operations or no later than January 1, 2030 depending on feasibility.
Methodology	LAHD will include this mitigation measure in ~~the permit~~Permit(s) with Tenant(s).

3.2.6. Significant Unavoidable Impacts

No significant unavoidable impacts related to energy would occur during construction or operation of the Proposed Project or alternatives.

Section 3.3
Greenhouse Gas Emissions

Section Summary

Section 3.3, *Greenhouse Gas Emissions*, provides the following:

- A description of existing greenhouse gas (GHG) emissions at the Port of Los Angeles (Port);
- A list of local, state, and federal regulations and policies that apply to the Terminal Island Maritime Support Facility (MSF) Project (Proposed Project) and alternatives;
- A discussion of the methodology used to determine whether the Proposed Project or alternatives would result in a significant adverse impact regarding GHG emissions (emission calculations are provided in ~~this Partially Revised and Recirculated Draft~~Final EIR Appendix B1);
- An impact analysis of the Proposed Project and alternatives; and
- A description of mitigation measures proposed to reduce significant adverse impacts of the Project, including reasonably foreseeable direct, indirect and cumulative impacts relating to GHG emissions.

Key Points of Section 3.3

The Proposed Project would result in direct and indirect GHG emissions at levels that would ~~not~~ exceed the South Coast Air Quality Management District (SCAQMD) threshold for industrial facilities. ~~when excluding the GHG emissions of the electricity supply; this impact would be~~ After full implementation of Project-specific mitigation, GHG emissions and climate change impacts would be reduced to less than significant. The GHG emissions attributable to the electricity supply are subject to control through California's Renewable Portfolio Standard (RPS) Program, where the electricity provider is obligated to reduce emissions thereby demonstrating compliance with the RPS targets. Under the No Impact Alternative (Alternative 1), no Project-related GHG emissions would occur. Under the Reduced Project Alternative (Alternative 2), GHG emissions would not exceed the SCAQMD threshold and therefore would result in a less-than-significant impact without the need for mitigation.

Construction-Related and Operations-Related Greenhouse Emissions Impacts

Construction and operational GHG emissions would be caused by construction vehicles and equipment and during operations from mobile sources, energy sources, area sources, water supply, solid waste, and onsite cargo-handling equipment. For the Proposed Project, the quantities of GHG emissions would ~~be below~~ exceed the SCAQMD threshold. ~~when excluding the GHG emissions of the electricity supply, resulting in a less-than-significant impact~~ A mitigation measure requiring ~~GHG reductions~~ carbon offsets to be purchased and retired (MM GHG-1) would reduce the impact to less than significant (Impact GHG-1). The No Project Alternative (Alternative 1) would have no impact. Impacts would be less than significant for the Reduced Project Alternative (Alternative 2) and no mitigation is necessary. All alternatives would conform with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

3.3.1. Introduction

This section includes a description of the affected environment, as it pertains to GHG emissions, and predicted impacts from construction and operation of the Proposed Project and alternatives. Emission calculations are provided in ~~Partially Revised and Recirculated Draft~~ Final EIR Appendix B1.

3.3.2. Environmental Setting

The global climate depends on the presence of naturally occurring GHGs to provide what is commonly known as the "greenhouse effect" which allows heat radiated from the Earth's surface to warm the atmosphere. The greenhouse effect is driven mainly by water vapor, aerosols, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and other constituents. Globally, the presence of GHG affects temperatures, precipitation, sea levels, ocean currents, wind patterns, and storm activity. Human activity directly contributes to emissions of the anthropogenic GHGs, including CO_2, primarily from the use of fossil fuels as a source of energy.

3.3.2.1. Greenhouse Gases

Effects of GHG Emissions. Changing temperatures, precipitation, sea levels, ocean currents, wind patterns, and storm activity provide indicators and evidence of the effects of climate change. From 1950 onward, relatively comprehensive data sets of observations are available. Research by California's Office of Environmental Health Hazard Assessment (OEHHA) documents climate change indicators by categorizing the effects as: changes in California's climate; impacts to physical systems including oceans, lakes, rivers, and snowpack; and impacts to biological systems including humans, vegetation, and wildlife. The primary observed changes in California's climate include increased annual average air temperatures, more-frequent extremely hot days and nights, and increased severity of drought. Impacts to physical systems affected by warming temperatures and changing precipitation patterns show decreasing snowmelt runoff, shrinking glaciers, and rising sea levels. Impacts to terrestrial, marine, and freshwater biological systems, with resulting changes in habitat, agriculture, and food supply are occurring in conjunction with the potential to impact human well-being (OEHHA, 2018).

California GHG Emissions Trends. California first formalized a strategy to achieve GHG reductions in 2008, when California produced approximately 484 million metric tons of CO_2 equivalent ($MMTCO_2e$) according to the official California Air Resources Board (CARB) inventory (CARB, 2023). The State's economy-wide emissions have been declining in recent years. California's sources of GHG emitted approximately 381 $MMTCO_2e$ in 2021 (CARB, 2023), less than ten percent of the U.S. GHG emissions total for 2019 of 6,577 $MMTCO_2e$.

3.3.3. Applicable Regulations

3.3.3.1. Federal Regulations

United States Environmental Protection Agency GHG Mandatory Reporting Program (40 CFR Part 98).

This rule requires mandatory reporting of GHG emissions for industrial facilities and power plants that emit more than 25,000 $MTCO_2e$ per year. The reporting program (40 CFR Part 98.300, Subpart DD) applies to electric and transmission distribution equipment that use high global warming potential gases, including sulfur hexafluoride (SF_6), for insulation. Currently, there are no federal regulations limiting GHG emissions from the types of sources that would occur with the Proposed Project. The circuit breakers and gas switches related to electric power (substation) may be sources of GHG subject to reporting due to the leakage of SF_6.

3.3.3.2. State Regulations

California Global Warming Solutions Act of 2006 (Assembly Bill 32)

Assembly Bill (AB) 32 required that California's GHG emissions be reduced to 1990 levels by 2020. The reduction is being accomplished through an enforceable statewide cap on global warming emissions beginning in 2012. AB 32 directs CARB to develop regulations and a mandatory reporting system to track and monitor global warming emissions levels (AB 32, Chapter 488, Statutes of 2006). CARB must update the AB 32 Scoping Plan at least every 5 years. Most recently, CARB approved the 2022 Scoping Plan Update in December 2022 (CARB, 2022), which outlines a roadmap to achieve carbon neutrality by 2045.

In passing AB 32, the California Legislature found that:

> *Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.*

Other major Executive Orders, legislation, and regulations adopted for the purpose of reducing GHG emissions support the implementation of AB 32 and California's climate goals, as described below.

California Governor's Executive Orders on GHG Emissions

In September 2018, Executive Order B-55-18 established a new statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. The CARB was directed to develop the framework for implementing the goal of carbon neutrality. Executive Order B-30-15 (April 2015) established a California GHG reduction target of 40 percent below 1990 levels by 2030. One purpose of this interim target is to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050 (Executive Order

S-3-05, June 2005). This executive order also specifically addresses the need for climate adaptation and directs state agencies to update the California Climate Adaptation Strategy to identify how climate change will affect California infrastructure and industry and what actions the state can take to reduce the risks posed by climate change. Senate Bill 32 (SB 32) of 2016 codified this GHG emissions target to 40 percent below the 1990 level by 2030.

California Renewables Portfolio Standard (RPS) Program

Electric utilities in California must procure a minimum quantity of the sales from eligible renewable energy resources as specified by RPS requirements. The Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350 [SB 350]) established California's state policy objectives on long-term energy planning and procurement as signed into law on October 7, 2015. The 100 Percent Clean Energy Act of 2018 (Senate Bill 100 [SB 100]) revised the RPS targets to establish the policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

With SB 350 and SB 100, California's objectives include:

- To set the RPS for the procurement of California's electricity from renewable sources at 33 percent by 2020, 50 percent by 2026, and 60 percent by 2030;
- To plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045; and
- To double the energy efficiency savings in electricity and natural gas end uses by retail customers by 2030.

The Clean Energy, Jobs, and Affordability Act of 2022 (SB 1020) added interim targets for renewable energy targets for electricity sales and procurement. The targets for renewable energy and zero-carbon energy retail sales of electricity to California end-use customers were set at 90 percent by 2035 and 95 percent by 2040 (CARB, 2022).

California Climate Crisis Act of 2022 (AB 1279)

AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The CARB 2022 Climate Change Scoping Plan outlines how carbon neutrality can be achieved by reducing anthropogenic GHG emissions while expanding actions to capture and store carbon through California's natural and working lands and using a variety of mechanical approaches (CARB, 2022).

Cap-and-Trade Program (17 CCR 95801 to 96022)

The California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (Cap-and-Trade Program) was initially approved by CARB in 2011. The Cap-and-Trade Program applies to covered entities that fall within certain source categories, including electric utilities, petroleum refiners, and suppliers of transportation fuels, and is triggered when facility emissions exceed 25,000 $MTCO_2e$ in a year. The covered entities must hold compliance instruments sufficient to cover the actual GHG emissions, as evidenced through the CARB's Mandatory Reporting Regulation requirements. This means that the suppliers of electricity, such as the Los Angeles

Department of Water and Power (LADWP), and providers of transportation fuels bear the GHG compliance obligation in the Cap-and-Trade Program for the GHG emissions from the electricity supply and from the use of transportation fuels in motor vehicle and off-road equipment.

3.3.3.3. Local Regulations

San Pedro Bay Ports Clean Air Action Plan

In 2017, the Port of Long Beach and Port of Los Angeles adopted the Clean Air Action Plan (CAAP) Update (SPBP, 2017), which outlines strategies to reduce pollution from port-related sources. The document provides guidance for accelerating progress toward a zero-emission future for the Port of Los Angeles. It includes strategies to reduce pollution from transportation and cargo-handling equipment. The CAAP aims to reduce GHGs from port-related sources to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The CAAP also outlines a 10 in a million excess residential cancer risk for individual port development projects.

Port of Los Angeles Clean Truck Program (CTP)

As part of the San Pedro Bay Ports CAAP, the Clean Truck Program (CTP) was established in 2008, and the 2017 CAAP Update reflects the early actions taken to comply with State law (SPBP, 2017). The CTP establishes efforts leading to an ultimate goal of a zero-emissions on-road drayage truck fleet by 2035 (SPBP, 2017). All drayage trucks entering port terminals must comply with the State law regulating drayage trucks and must comply with the provisions of the Port of Los Angeles Tariff Section 20: Clean Air Action Plan – General Rules & Regulations. As of 2018, new trucks entering the Port's Drayage Truck Registry (PDTR) must have a 2014 engine model year or newer. Existing trucks already in the PDTR prior to 2018 can continue to operate in the Port. As of April 1, 2022, all combustion engine heavy-duty trucks entering Port terminals are charged a rate to enter with limited exemptions for trucks that are ~~not~~ certified to meet the State's low NOx standard and exemptions for zero-emission trucks~~or better are charged a rate to enter. As of 2020, all heavy-duty trucks entering Port terminals that are not certified to meet the State's near-zero standard or better are charged a rate to enter. Existing trucks already in the PDTR can continue to operate in the Port.~~ The CTP has reduced pollution from harbor trucks by more than 90 percent since its adoption.

City of Los Angeles Green New Deal Sustainable City pLAn

The Port has adopted the City of Los Angeles Sustainable City pLAn (City of Los Angeles, 2019). The Plan contains goals for the city including in areas of local solar, energy efficient buildings, carbon and climate leadership, green jobs, preparedness and resiliency, air quality, and environmental justice. The following targets from the pLAn would be applicable to the proposed Project:

- Reduce vehicle miles traveled per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.
- Reduce port related GHG emissions by 80% by 2050.
- Reduce industrial emissions by 38% by 2035; and 82% by 2050.

City of Los Angeles General Plan

The City of Los General Plan Health, Wellness, and Equity Element and Air Quality Element (City of Los Angeles, 2021) contains the following objectives and policies related to GHG emissions that are applicable to the Proposed Project:

Objective AQ 1.1	It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan [AQMP], increase traffic mobility, and sustain economic growth citywide.
Objective AQ 4.2	It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.
Policy AQ 4.2.5	Emphasize trip reduction, alternative transit, and congestion management measures for discretionary projects.
Objective AQ 5.1	It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.
Policy AQ 5.1.1	Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.
Policy AQ 5.1.2	Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.
Policy AQ 5.1.4	Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.

3.3.4. Impacts and Mitigation Measures

3.3.4.1. Methodology

All construction- and operation-related GHG emissions are quantified based on the best available forecast of activities. This analysis uses the California Emissions Estimator Model (CalEEMod; version 2022.1.1) software developed by the California Air Pollution Control Officers Association (CAPCOA). This is the most recent online version of the CalEEMod software, and it relies upon mobile source emission factors from the CARB OFFROAD2017 inventory and EMFAC2021 models. Spreadsheet analysis of emissions from diverted truck travel augments the CalEEMod analysis for additional miles travelled by the drayage truck fleet mix in the CARB's EMFAC2021 (v1.0.2).

Where Proposed Project-specific design features are not yet defined, default and typical settings from CalEEMod are used, as published in the CalEEMod User's Guide and supporting appendices (CAPCOA, 2022). ~~Partially Revised and Recirculated Draft~~Final EIR Appendix B1, Air Quality/GHG Emissions Calculations, provides details on the construction and operational assumptions for the Proposed Project and resulting emissions estimates used in this analysis.

3.3.4.2. Geographic Boundaries

For the purpose of assessing GHG impacts under CEQA, GHG emissions of the Proposed Project and alternatives were calculated within the South Coast Air Quality Management District (SCAQMD) boundaries. Complete trip lengths were used for construction workers, vendors, and hauling trips.

3.3.4.3. CEQA Baseline

State CEQA Guidelines, Section 15125, subdivision (a), provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation and Initial Study (NOP/IS) is published (~~Draft~~ Final EIR Appendix A). Since the NOP/IS was released in December 2023, the LAHD has determined that 2023 is the baseline year for the CEQA analysis. In 2023, the baseline conditions for the Proposed Project include the existing conditions of the site, which consists of an unoccupied, unused parcel. No construction or operations currently occur. The Proposed Project would represent a new use at the site and generate new chassis storage/support and/or wheeled empty container storage activities at the site, including emissions from both passenger vehicles and trucks.

3.3.4.4. Thresholds of Significance

State CEQA Guidelines Appendix G (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) CEQA Checklist suggests two criteria for determining the significance of impacts related to GHG emissions:

Would the Project:

(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

(b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Accordingly, the Proposed Project or alternative would have a significant impact if it would:

GHG-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

GHG-2: Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The guidelines do not specify significance thresholds and allow the lead agencies discretion in how to address and evaluate significance based on these criteria. To provide guidance to local lead agencies regarding determining significance for GHG emissions in CEQA documents, SCAQMD convened the GHG CEQA Significance Threshold Working Group. Members of the working group included government agencies that implement CEQA and representatives from various stakeholder groups that provide input to SCAQMD staff members regarding developing the GHG CEQA significance thresholds.

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal regarding an interim GHG significance threshold for projects where SCAQMD is lead agency. For industrial projects, a significance threshold of 10,000 $MTCO_2e$/year was established. Construction GHG emissions, amortized over project life, are required to be included in a project's annual GHG emissions totals (SCAQMD, 2008). LAHD has determined that the SCAQMD-adopted 10,000 $MTCO_2e$/year threshold is suitable for all LAHD projects for the following reasons:

- The SCAQMD industrial source threshold is appropriate for projects with future operations continuing as far out as 2050. The SCAQMD threshold development methodology (SCAQMD, 2008) used Executive Order S-3-05 emission reduction

targets as the basis in developing the threshold, with the AB 32 reduction requirements (2020) incorporated as a subset of Executive Order S-3-05. Executive Order S-3-05 established an emission reduction target of 80 percent below 1990 levels by 2050.

- The SCAQMD industrial source threshold is appropriate for projects having both stationary and mobile sources, both of which are components of LAHD projects. CAPCOA guidance (CAPCOA, 2008) considers industrial projects to include substantial GHG emissions associated with mobile sources. SCAQMD, on industrial projects for which it is the lead agency, uses the 10,000 $MTCO_2e$/year threshold to determine CEQA significance by combining a project's stationary source and mobile source emissions. Although the threshold was originally developed for stationary sources, SCAQMD staff views the threshold as conservative for projects with both stationary and mobile sources because it is applied to a larger set of emissions and therefore captures a greater percentage of projects than would be captured if the threshold was only used for stationary sources (SCAQMD, 2016). For example, in one of its recent EIRs, the SCAQMD applied the 10,000 $MTCO_2e$ /year threshold to a refinery project where the mobile source emissions would increase and the stationary source emissions (combined direct and indirect) would decrease relative to baseline. The mobile source emissions included construction equipment, on-road vehicles, and on and off-site rail transport. Moreover, in the same EIR, the SCAQMD (2016) also applied the 10,000 $MTCO_2e$ /year threshold to its list of related cumulative projects, two of which were LAHD projects (SCIG and ILWU Local 13 Dispatch Hall) with dominant mobile source emissions. The SCAQMD also specifically approved the use of the 10,000 $MTCO_2e$ /year threshold on another current Port CEQA project dominated by mobile sources (LAHD, 2017).
- The SCAQMD industrial source threshold is appropriate for projects with sources that use primarily diesel fuel. Although most of the sources that were considered by the SCAQMD (2008) in the development of the 10,000 $MTCO_2e$ /year threshold are natural gas-fueled, both natural gas and diesel combustion produce CO_2 as the dominant GHG (The Climate Registry, 2024). Furthermore, the conversion of all GHG species into a CO_2e ensures that the GHG emissions from any source, regardless of fuel type, can be evaluated equitably.
- The SCAQMD industrial source threshold is conservative for LAHD projects. Based on the 10,000 $MTCO_2e$ /year threshold, it would capture approximately 90 percent of regulated, permitted industrial facilities subject to the SCAQMD's Annual Emission Reporting (AER) program (SCAQMD, 2024). LAHD projects subject to CEQA review usually far exceed this threshold because of their large size and large number of mobile sources such as oceangoing vessels, drayage trucks, trains, and cargo handling equipment. A review of LAHD CEQA documents certified between 2007 and 2016 (GHG emissions were not quantified in Port CEQA documents before 2007) found that the 10,000 $MTCO_2e$ /year threshold would have captured 98 percent of LAHD project CO_2e emissions (LAHD, 2016).

After considering these guidelines and LAHD-specific climate change impact issues, LAHD has set the following thresholds for use in this EIR to determine the

significance of Proposed Project-related GHG impacts. The Proposed Project or alternative would create a significant GHG impact if it:

GHG-1: Generates GHG emissions that, either directly or indirectly, exceed the SCAQMD 10,000 $MTCO_2e$/year threshold

Impacts under GHG-1 are determined by comparing the combined amortized construction and future operational emissions with the baseline scenario. Total construction emissions are amortized over the life of the Proposed Project or alternative and included in the CEQA impact determination. As noted above, State CEQA Guideline Section 15064.4(b) provides that one factor to be considered in assessing the significance of GHG emissions on the environment is "the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of GHG emissions."

Several state, regional and local plans have been developed that set goals for the reduction of GHG emissions over the next few years and decades. Some of these plans and policies (notably, EO S-3-05 and AB 32) were taken into account by the SCAQMD in developing the 10,000 $MTCO_2e$/year threshold. However, no regulations or requirements have been adopted by relevant public agencies to implement those plans for specific projects, within the meaning of State CEQA Guidelines Section 15064.4(b)(3). Consequently, no CEQA significance assessment based upon compliance with such regulations or requirements can be made for the Proposed Project. Nevertheless, for the purpose of disclosure, LAHD has considered for informational purposes only, whether the Proposed Project activities, features, mitigations and lease measures are consistent with federal, state or local plans, policies or regulations for the reduction of GHG emissions, as set forth below:

Finally, State CEQA Guidelines Section 15126.2(a) identifies the need to evaluate potential impacts of locating development in areas that are vulnerable to climate change effects. The EIR "should evaluate any potentially significant impacts of locating development in other areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas)." Although no significance thresholds are defined for evaluating the potential impacts of locating development in areas that are vulnerable to climate change effects, the analysis addresses this evaluation qualitatively.

For determining significance of the impact on the environment caused by GHG emissions, the Proposed Project GHG emissions are compared with a screening threshold of 10,000 $MTCO_2e$/year developed by the SCAQMD for industrial facilities (SCAQMD, 2023).

3.3.5. Impact Analysis

3.3.5.1. Proposed Project

Impact GHG-1: Would the Proposed Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction and Operation

The Proposed Project would generate GHG emissions from construction activities, operational transportation, energy, waste disposal, and area sources (such as on-site equipment). The activities associated with the Proposed Project include mobilizing construction equipment, crews, and materials, and would require use of motor vehicles and off-road equipment during all construction activities and clean-up. These activities would cause GHG emissions due to fuels used by the construction vehicles and off-road equipment. The different sources include diesel-powered off-road equipment, gasoline-powered construction vehicles and equipment including on-highway trucks and autos for moving crews, equipment, materials, and water and for fuel delivery, and helicopters. Equipment and motor vehicles would directly emit CO_2, CH_4, and N_2O due to fuel use and combustion.

The resulting one-time quantity of GHG caused by construction would be 7,046 ~~3,291~~ $MTCO_2e$ (~~Partially Revised and Recirculated Draft~~ Final EIR Appendix B1, Air Quality/ GHG Emissions Calculations) emitted over the construction duration of approximately 24 months. Haul truck travel distances to export soil would vary, averaging 80 miles per one-way trip, and emissions from trucks hauling soil exports would be the predominant source of construction GHG. To consider the overall effect of construction GHG emissions over the anticipated useful life of the facilities, the SCAQMD recommends assuming a 30-year life for amortizing total construction GHG emissions. The amortized construction GHG emissions rate would be 234.9 ~~109.7~~ $MTCO_2e$/-year, based on the one-time construction-phase quantity of 7,046 ~~3,291~~ $MTCO_2e$ divided over 30 years.

Long-term operations of the Proposed Project would generate GHG emissions from mobile sources, energy sources, area sources, water supply, solid waste, and on-site cargo-handling equipment (assumed to be diesel-powered in the opening year [2029~~2027~~]). The analysis also includes the potential additional vehicle-miles traveled from diverting existing truck trips, which are not new truck trips generated to/from the POLA-POLB. The cargo-handling equipment would generate approximately 2,389 ~~2,388~~ $MTCO_2e$/year in operational-phase GHG emissions under opening year (2029~~2027~~) conditions, and electrification of cargo-handling activities required by Project Feature (PF) AQ-1 (*Zero-Emissions Operational Equipment*) would reduce the on-site cargo-handling equipment emissions to zero before the full buildout year (2049~~2046~~).

Operational energy consumption includes electricity use that would increase between the opening year and full buildout year with increased electrification of cargo-handling equipment. Emission factors for the electricity supply rely on CalEEMod defaults for Los Angeles Department of Water and Power and are conservatively assumed to remain constant between the Project opening year and full buildout year (CAPCOA, 2022). Consistent with RPS Program requirements, emission factors would decline as the electricity supply reflects increasing procurement of renewable energy by the utility.

Table 3.3-1 shows emissions from three components of ~~A~~additional drayage truck ~~travel~~activity: off-site, ~~for the trucks diverted to the site and~~ on-site, and on-site idling, could cause up to 10,172 ~~6,346~~ $MTCO_2e$/year for the opening year (2029~~2027~~) and 13,896 ~~8,464~~ $MTCO_2e$/year for the full buildout year (2049~~2046~~). Prior to Proposed Project buildout (2049~~2046~~), emissions from the truck trips served by the site would trend towards lower emissions than in the opening year as the CTP progresses towards the CAAP goal of a 100 percent transition to zero-emission trucks by 2035. Reductions related to meeting the 2035 zero-emission truck goal, however, are not included in the quantification presented.

The amortized construction and annual operational GHG emissions associated with the Proposed Project are summarized in Table 3.3-1. As shown, construction and operation of the Proposed Project would generate a combined total of approximately 13,398 ~~9,457~~ $MTCO_2e$/year under opening year (2029~~2027~~) and 15,630 ~~10,074~~ $MTCO_2e$/year under full buildout year (2049~~2046~~). The largest contributor to annual GHG emissions would be due to ~~off-site~~ truck travel during operations.

The total annual GHG emissions from the Proposed Project in the opening year (2029~~2027~~) and full buildout year (2049~~2046~~) added to the amortized construction emissions are shown in Table 3.3-1.

Table 3.3-1: Proposed Project Annual GHG Emissions

Activity	$MTCO_2e$/year
Amortized Construction Emissions	234.9 ~~109.7~~
Opening Year (2029~~2027~~)	---
Worker Vehicles (2029~~2027~~)	308 ~~319~~
Cargo-Handling Equipment (2029~~2027~~)	2,389 ~~2,388~~
Electricity Use (2029~~2027~~)	282
Other Energy, Area Sources (2029~~2027~~)	13
Off-Site, Truck Trips (2029~~2027~~)	4,426 ~~4,536~~
On-Site, Truck Trips (2029~~2027~~)	4,201 ~~1,146~~
On-site, Truck Idling (2029~~2027~~)	1,545 ~~664~~
Total Annual Emissions (2029~~2027~~) – Amortized Construction + Operations	**13,398 ~~9,457~~**
Full Buildout Year (2049~~2046~~)	---
Worker Vehicles (2049~~2046~~)	335 ~~337~~
Cargo-Handling Equipment (2049~~2046~~)	0
Electricity Use (2049~~2046~~)	1,151
Other Energy, Area Sources (2049~~2046~~)	13
Off-Site, Truck Trips (2049~~2046~~)	5,710 ~~5,799~~
On-Site, Truck Trips (2049~~2046~~)	5,316 ~~1,431~~
On-site, Truck Idling (2049~~2046~~)	2,870 ~~1,234~~
Total Annual Emissions (2049~~2046~~) – Amortized Construction + Operations	**15,630 ~~10,074~~**

Source: ~~Partially Revised and Recirculated Draft~~Final EIR Appendix B1, Air Quality/GHG Emissions Calculations.
Note: Emissions may not precisely add up due to rounding.

The GHG emissions attributable to the electricity supply for the Proposed Project are subject to control through the RPS Program, and LADWP is obligated to reduce GHG emissions to demonstrate compliance with the targets, as discussed in Section 3.3.3.2, *State Regulations*.

The electricity supply is subject to the procurement actions taken by LADWP, which has approved a 2022 Power Strategic Long-Term Resource Plan (SLTRP). The 2022 SLTRP is known as the "LA100 Plan" as it establishes a roadmap to implement a City Council motion to achieve an electricity supply that is 100 percent carbon-free by 2035, in advance of 100 Percent Clean Energy Act of 2018 (SB 100) targets of zero-carbon resources for commercially available electricity by 2045. These actions are anticipated to achieve the SB 100 targets in advance of the Proposed Project full buildout year (2049~~2046~~) and would have the effect of reducing the GHG emissions associated with electricity use throughout the State and City. As such, emissions associated with electricity are estimated to trend downward and are not included in the impact assessment in the full buildout year (2049~~2046~~) as existing legislature will reduce those emissions in future years. The RPS Program and the provisions of the Cap-and-Trade Program applicable to suppliers of electricity are previously approved programs with regulations adopted for the purpose of reducing GHG emissions. The Project's use of electricity supplied by LADWP would not result in a considerable incremental contribution to the cumulative effect of GHG emissions because LADWP must comply with the RPS that requires increasing renewable energy procurement over time to avoid and lessen the effects of GHG emissions from electricity generation.

As shown in Table 3.3-2, the total annual GHG emissions from the Proposed Project in the opening year (2029~~2027~~) with electricity included and full buildout year (2049~~2046~~) without electricity included, due to future attainment of SB 100, would ~~not~~ exceed the screening threshold of 10,000 $MTCO_2e$/year~~; therefore, impacts would be less than significant~~.

Table 3.3-2: Proposed Project Annual GHG Emissions~~, Excluding Electricity Supply~~ in Opening Year and Full Buildout Year

Activity	$MTCO_2e$/year
Amortized Construction Emissions	234.9 ~~109.7~~
Opening Year (2029~~2027~~)	---
Total Annual Emissions (2029~~2027~~) – Amortized Construction + Operations including Electricity Use	**13,398 ~~9,457~~**
Threshold	10,000
Exceeds Threshold?	**Yes ~~No~~**
Full Buildout Year (2049~~2046~~)	---
Total Annual Emissions (2049~~2046~~) – Amortized Construction + Operations including Electricity Use	15,630 ~~10,074~~
Total Annual Emissions (2049~~2046~~) – Amortized Construction + Operations without Electricity Use	**14,479 ~~8,923~~**
Threshold	10,000
Exceeds Threshold?	**Yes ~~No~~**

Source: SCAQMD, 2023; ~~Partially Revised and Recirculated Draft~~Final EIR Appendix B1, Air Quality/GHG Emissions Calculations.

Impact Determination

Table 3.3-2 shows that the Proposed Project GHG emissions, when excluding those attributable to the electricity supply that are subject to control through the RPS Program, would ~~not~~ exceed the 10,000 $MTCO_2e$/year threshold. Accordingly, ~~no mitigation would be required for~~ the impact of the Proposed Project GHG emissions would be significant.

Project Features and Mitigation Measures

~~No~~ Project-specific mitigation is required to reduce GHG emissions. LAHD has developed a mitigation measure that would mitigate the Proposed Project's annual GHG emissions in excess of LAHD's significance threshold of 10,000 $MTCO_2e$/year.

- **MM GHG-1: GHG Reduction Offsets.** The ~~Project~~ Tenant(s) and/or LAHD shall be required to purchase and retire carbon offsets related to activities that reduce, avoid, destroy, or sequester an amount of GHG emissions in an off-site location to offset the equivalent amount of GHG emissions generated by the Project in excess of ~~the~~ LAHD's significance threshold of 10,000 metric tons CO_2 equivalent ($MTCO_2e$) per year. From the first year of the Permit, through the end of the term of the Permit, the ~~Project~~ Tenant(s) and/or LAHD shall purchase and retire carbon offsets each year in an amount that would be the equivalent of the Project's estimated residual GHG emissions. The estimated residual emissions for each calendar year shall be based upon the calculations ~~using the same methodology used in this assessment~~ in Appendix B1 of the Final EIR prepared for the Project except as adjusted in accordance with paragraph (a) or (b), below.

  The LAHD is in the process of developing a Greenhouse Gas Program. The Program shall be used for GHG-reducing projects and programs approved by LAHD. If that Program is established during the term of the Permit, the ~~Project~~ Tenant(s) and/or LAHD shall have the option to offset the required amount of GHG emissions through a funding contribution to the Greenhouse Gas Program rather than towards purchasing carbon offsets from a CARB-recognized registry.

  While the LAHD Greenhouse Gas Program is currently under development, the ~~Project~~ Tenant(s) and/or LAHD shall purchase and retire carbon offsets from a CARB-recognized offset registry as follows:

  Carbon offsets: The ~~Project~~ Tenant(s) and/or LAHD shall purchase and retire carbon offsets from a CARB-recognized registry to ensure that offsets will result in real, permanent, additional, quantifiable, verifiable, and enforceable reductions. The carbon offsets shall be verifiable ~~by LAHD~~ and enforceable in accordance with the registry's applicable standards, practices, or protocols.

  The order of priority for purchasing (any one or more) carbon offsets shall be considered as follows:

  (i) Originating within the local area;

  (ii) Originating within the South Coast Air Basin;

  (iii) Originating within the state of California; or

  (iv) If sufficient local and in-state offsets are not available, conforming national offsets registered with a CARB-recognized registry ~~shall be purchased~~.

Adjustment of the Project's Required Offsets through Other Verified GHG Emission Reductions: The ~~Project~~ Tenant(s) and/or LAHD may pursue the following modifications to the Project's total estimated GHG emissions identified in this measure. These modifications may be pursued in conjunction with or independent of each other on an up to annual basis.

(a) Adjustment in GHG Emissions

In the event of changes in activities, efficiency, reduced operations, regulations or for any other purpose, an adjustment of the required carbon offsets may be requested based on an evaluation of actual GHG emissions rather than future projected GHG emission calculations in the Final EIR. If the actual annual GHG emissions do not exceed the significance threshold of 10,000 $MTCO_2e$ per year, no carbon offsets shall be required. To adjust the required number of carbon offsets for purchase by the Tenant(s), the Tenant(s) shall make a request in writing to the LAHD for review and approval for the calendar year under consideration and shall submit a report within 60 days that quantifies the actual GHG emissions by an expert or an independent, qualified third-party. The evaluation of actual GHG emissions must be performed using acceptable industry standards and protocols for all sources that were included in the Project's GHG emissions calculations under Impact GHG-1. LAHD review shall occur within 30 days of receipt of the submitted report. Any expenses incurred by LAHD in processing the request, including retaining an independent third-party verifier to peer review the report, shall be borne by the Tenant(s). Alternatively, LAHD may implement a review for its own purpose, subject to the same quantification process described above, to adjust GHG emissions at any time during the life of the Project.

or

(b) Implementation of Additional GHG Reduction Methods

In addition, the ~~Project~~ Tenant(s) may request a reevaluation of required carbon offsets to be purchased according to this paragraph. The Tenant(s) may implement different and additional GHG reduction methods if new technology and/or other feasible measures become available during the term of the Permit. To adjust the ~~Project's~~ required number of carbon offsets for purchase, the Tenant(s) shall identify such additional GHG reduction actions and must quantify the GHG emission reductions from these GHG reduction actions by an independent, qualified third-party verifier. Once the GHG reduction actions are found to be feasible and are reviewed and approved by LAHD staff, the Tenant(s) may request that LAHD reduce its required purchase of carbon offsets by the equivalent amount of demonstrated reduction. Any expenses incurred by LAHD in processing the request, including retaining a third-party verifier, shall be borne by the Tenant(s).

Additionally, to reduce air pollutant emissions, the~~The~~ Proposed Project would ~~, however,~~ require the use of zero-emission operational equipment by January 1, 2030 with the following Project Feature, which would also reduce operational GHG emissions.

PF AQ-1: Zero-Emission Operational Equipment. All yard equipment would be required to be zero emissions by January 1, 2030. Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. A 100 percent transition to zero emissions by January 1, 2030 shall be required, and any

non-conforming equipment used or acquired after this date would be considered a breach of the Permit/Lease conditions.

Additionally, MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) identified for air quality impacts in Section 3.1, *Air Quality and Health Risk*, would provide for early electrification of cargo-handling equipment, depending on feasibility, and this measure would also reduce ~~which may also improve~~ operational GHG emissions.

MM AQ-1: Zero-Emission Cargo-Handling Equipment. At the start of operation, Tenant shall utilize zero-emission ~~off-road~~ cargo-handling equipment (CHE) for Project operations. If the Tenant determines that specific CHE types cannot feasibly be deployed due to operational or infrastructure constraints, the Tenant shall provide a written report detailing the evidence and supporting documentation concerning feasibility and other relevant factors within 90 calendar days. The feasibility determination shall be subject to mutual agreement between the Board of Harbor Commissioners and Tenant, which shall not be unreasonably withheld by Tenant.

All CHE operated on site shall be zero emissions starting January 1, 2030.

In the event an a~~A~~pplicable l~~L~~aw comes into effect that requires the cargo-handling equipment used on site to be zero-emission equipment, the a~~A~~pplicable l~~L~~aw would govern.

Residual Impacts

Implementation of MM GHG-1 (*GHG Reduction Offsets*) would require the ~~Project~~ Tenant(s) and/or LAHD to reduce GHG emissions and provide evidence of the reductions with carbon offsets for the quantity of the Project's GHG emissions generated in excess of the LAHD's significance threshold of 10,000 $MTCO_2e$/year.

Table 3.3-3 shows the amount of GHG reduction offsets required by MM GHG-1 (*GHG Reduction Offsets*) for the Proposed Project, and the residual impact at 10,000 $MTCO_2e$/year. Impacts would be less than significant with mitigation.

Table 3.3-3: Proposed Project with Mitigation for GHG Reduction Offsets

Activity	$MTCO_2e$/year
Opening Year (2029)	
Proposed Project Annual Emissions (2029) – Amortized Construction + Operations including Electricity Use	13,398
MM GHG-1 Required GHG Reduction Offsets (2029)	(3,398)
Residual Proposed Project with Mitigation	**10,000**
Threshold	10,000
Exceeds Threshold?	No

Activity	$MTCO_2e$/year
Full Buildout Year (2049)	
Proposed Project Annual Emissions (2049) – Amortized Construction + Operations without Electricity Use	14,479
MM GHG-1 Required GHG Reduction Offsets (2049)	(4,479)
Residual Proposed Project with Mitigation	**10,000**
Threshold	10,000
Exceeds Threshold?	No

Source: SCAQMD, 2023; ~~Partially Revised and Recirculated Draft~~ Final EIR Appendix B1, Air Quality/GHG Emissions Calculations.

Impact GHG-2: Would the Proposed Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

Construction and Operation

Activities related to both construction and operation of the Proposed Project would emit GHG mostly through the use of transportation fuels that are within the policies of the State's AB 32 Climate Change Scoping Plan (CARB, 2022). The majority of emissions would be from mobile sources. Mobile sources of GHG, including the off-road equipment and on-road motor vehicles, are not directly subject to GHG controls, but would be users of transportation fuels from refiners and suppliers that are required to comply with CARB Cap-and-Trade and Low Carbon Fuel Standard regulations to reduce GHG emissions caused by the production and use of transportation fuels.

Table 3.3-~~4~~3 summarizes the consistency of the Proposed Project with key relevant GHG reduction strategies. As summarized in Table 3.3-~~4~~3, Proposed Project activities related to construction and operation would either be exempt from or would be required to comply with CARB rules and regulations to reduce GHG emissions. The Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Table 3.3-~~4~~3: Applicable GHG Emissions Reduction Strategies

Strategy	Compliance with Strategy
State AB 32 Climate Change Scoping Plan Strategies (CARB, 2022)	
Limited Idling Time for Commercial Vehicles (13 CCR § 2485) and Off-Road Equipment (13 CCR § 2449)	The construction contractors and truck operators would be required to comply with applicable idling regulations for on-road vehicles during construction and operation. Additionally, the construction contractor and operators would be required to comply with applicable off-road equipment idling requirements during construction and operation.
Use of Low Carbon or Alternative Fuels (Low Carbon Fuel Standard)	The Project's primary source of GHG emissions is from transportation fuel use. The facility and facility users would use California fuels that are subject to the Low Carbon Fuel Standard regulations. While these regulations are new and have not yet caused a large penetration of low carbon/renewable fuels, over the Project life, GHG emissions from transportation and on-site equipment would be reduced as low carbon fuel supplies increase statewide.

Strategy	Compliance with Strategy
Electricity Use/Renewables Performance Standard	The Project's electricity would be supplied by Los Angeles Department of Water and Power, a California publicly owned utility that is subject to the Renewables Performance Standard, which requires utilities to steadily increase the procurement of renewable energy to reduce the GHG emissions of the electricity supply. Therefore, the electricity used at the Project site would comply with state electricity sector GHG reduction strategies.
Advanced Clean Trucks and Advanced Clean Fleets Regulations	These regulations establish goals for the manufacture and sales for electrification of California's heavy-duty truck fleet, although not yet enforceable. Regulations for drayage truck fleets would require use of electric or other zero-emission models of heavy-duty vehicles and retirement of older legacy drayage trucks as new models spread throughout the market in the future.
Port of Los Angeles and City of Los Angeles Plans and Strategies	
LA's Green New Deal / Sustainable City pLAn (City of Los Angeles, 2019)	The City of Los Angeles' Sustainable City pLAn is intended to guide operational, policy, and financial decisions to create a more sustainable Los Angeles. Although the Plan is mostly focused on city property, buildings, and public transportation, the plan includes the 80% from baseline emissions reduction goal and notes three primary GHG emissions reduction initiatives, two of which would apply to Project emission sources: - 100% zero-emissions cargo-handling equipment by 2030. - 100% zero-emissions on-road drayage trucks by 2035. Only drayage trucks registered in the Ports Drayage Truck Registry or having a day pass would be admitted to the Project site, and this would ensure compliance with the Ports' Clean Truck Program (SPBP, 2017). LAHD will address the implementation of the port-wide cargo-handling equipment emissions reduction initiative for all affected tenants. Implementation will include the replacement of existing fossil fuel powered cargo-handling equipment with electrically powered cargo-handling equipment and the use of renewable fuels to replace fossil fuel use. A goal for the facility would be compliance with this emissions reduction initiative by 2030.
San Pedro Bay Ports Clean Air Action Plan (CAAP) (SPBP, 2017)	The CAAP has several policy initiatives related to GHG emissions reductions. The policy initiatives that apply to the project's GHG emissions sources are the same as those listed above for the Sustainable City pLAn.
City of Los Angeles General Plan – Mobility Element (City of Los Angeles, 2016)	The City of Los Angeles General Plan, Mobility Element was developed to improve the way people, goods, and resources are moved in Los Angeles. The Proposed Project would be consistent with this General Plan Element.

Impact Determination

The Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. This impact would be less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

3.3.5.2. Alternative 1 – No Project Alternative

Under this alternative, the Project site would remain unused. Like the CEQA baseline, the activities under the No Project Alternative (Alternative 1) are considered negligible in the foreseeable future as no future development has been permitted or approved.

Impact GHG-1: Would the No Project Alternative (Alternative 1) generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

In the No Project Alternative (Alternative 1), the Project would not be constructed. No construction or operations phase GHG emissions would occur.

Impact Determination

Since no construction or operation phase emissions would occur under the No Project Alternative (Alternative 1), there would be no impacts.

Mitigation Measures

Mitigation is not required.

Residual Impacts

There would be no residual impacts.

Impact GHG-2: Would the No Project Alternative (Alternative 1) conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

In the No Project Alternative (Alternative 1), the Project would not be constructed. No construction or operations phase GHG emissions would occur, and there would be no potential to conflict with an applicable plan, policy, or regulation for reducing GHG emissions.

Impact Determination

The No Project Alternative (Alternative 1) would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. There would be no impacts.

Mitigation Measures

Mitigation is not required.

Residual Impacts

There would be no residual impacts.

3.3.5.3. Alternative 2 – Reduced Project Alternative

In the Reduced Project Alternative (Alternative 2), the Project site area would be reduced from 89.2 acres to ~~52.7~~ 51.7 acres (71 acres [usable space]/2 + 16.2 acres other/outside loop), essentially utilizing half the usable space. Construction and operational activities would be identical to the Proposed Project, but with reduced intensity. Less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced Project footprint.

Impact GHG-1: Would the Reduced Project Alternative (Alternative 2) generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

In the Reduced Project Alternative (Alternative 2), the usable site area would decrease by half. Since the area of Reduced Project Alternative (Alternative 2) is half that of the Proposed Project and since construction activities would be the same, with reduced intensity, the total GHG emissions associated with Reduced Project Alternative (Alternative 2) would be approximately half of ~~less than~~ the Proposed Project.

Impact Determination

Since construction and operation emissions would be approximately half ~~less than~~ that of the Proposed Project, the rate of annual GHG emissions would not exceed the 10,000 $MTCO_2e$/year threshold.~~,~~ The impacts from GHG emissions under the~~of~~ Reduced Project Alternative (Alternative 2) would be less than significant.

Mitigation Measures

No mitigation is required for the Reduced Project Alternative (Alternative 2); however, GHG emissions would be reduced with implementation of PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*). See Section 3.3.5.1, Proposed Project, under Impact GHG-1, for the full text of this Project Feature and mitigation measure.

Residual Impacts

Impacts would be less than significant.

Impact GHG-2: Would the Reduced Project Alternative (Alternative 2) conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

In the Reduced Project Alternative (Alternative 2), construction and operation activities at the site would emit GHG mostly through the use of transportation fuels that are within the policies of the Climate Change Scoping Plan. The majority of emissions would be from mobile sources – the off-road equipment and on-road motor vehicles that are not directly subject to GHG controls, but would be users of transportation fuels from refiners and suppliers that are required to comply with CARB Cap-and-Trade and Low Carbon Fuel Standard regulations to reduce GHG emissions. Through these programs, Reduced Project Alternative (Alternative 2) activities would either be exempt from or would be required to comply with CARB rules and regulations to reduce GHG emissions and

would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Impact Determination

The Reduced Project Alternative (Alternative 2) would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. This impact would be less than significant.

Mitigation Measures

Mitigation is not required.

Residual Impacts

Impacts would be less than significant.

3.3.5.4. Summary of Impact Determinations

Table 3.3-5~~4~~ summarizes the CEQA impact determinations of the Proposed Project and alternatives related to GHG emissions. This table is meant to allow easy comparison of the potential impacts of the Proposed Project and alternatives. Identified potential impacts may be based on federal, state, or City of Los Angeles significance criteria, LAHD criteria, and the scientific judgment of the report preparers.

For each type of potential impact, the table provides the CEQA impact determination, applicable mitigation, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

Table 3.3-5~~4~~: Summary Matrix of Potential Impacts and Mitigation Measures for GHG Emissions

Alternative	Environmental Impacts	Impact Determination	Applied Mitigation Measures	Residual Impacts
Proposed Project	**GHG-1:** Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment	~~Less Than Potentially~~ Significant	**MM GHG-1:** GHG Reduction Offsets ~~Mitigation Not Required~~ **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Less Than Significant
	GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions	Less Than Significant	Mitigation Not Required	Less Than Significant
Alt 1 – No Project	**GHG-1**	No Impact	Mitigation Not Required	No Impact
	GHG-2	No Impact	Mitigation Not Required	No Impact

Alternative	Environmental Impacts	Impact Determination	Applied Mitigation Measures	Residual Impacts
Alt 2 – Reduced Project	**GHG-1**	Less Than Significant	Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Less Than Significant
	GHG-2	Less Than Significant	Mitigation Not Required	Less Than Significant

3.3.5.5. Mitigation Monitoring

To reduce the impact of Proposed Project's GHG emissions, MM GHG-1 (*GHG Reduction Offsets*) would require offsets to be purchased and retired ~~sponsor activities to reduce, avoid, destroy, or sequester GHG emissions. The mitigation monitoring program below does not contain any mitigation measures, as none were found necessary~~Instead Additionally, for reducing air pollutant emissions, this section summarizes implementation of the applicable ~~Project Feature~~PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*), which would be applied to the Proposed Project and Reduced Project Alternative (Alternative 2) as a condition of approval. MM GHG-1 (*GHG Reduction Offsets*) would not apply to Alternative 2 (Reduced Project Alternative). Mitigation is not applicable to Alternative 1 (No Project).

Mitigation Measure	**MM GHG-1: GHG Reduction Offsets.** The ~~Project~~ Tenant(s) and/or LAHD shall be required to purchase and retire carbon offsets related to activities that reduce, avoid, destroy, or sequester an amount of GHG emissions in an off-site location to offset the equivalent amount of GHG emissions generated by the Project in excess of the LAHD's significance threshold of 10,000 metric tons of carbon dioxide equivalent (CO_2e) per year. From the first year of the Permit, through the end of the term of the Permit, the Tenant(s) and/or LAHD shall purchase and retire carbon offsets each year in an amount that would be the equivalent of the Project's estimated residual GHG emissions. The estimated residual emissions for each calendar year shall be based upon the calculations ~~using the same methodology used in this assessment~~ in Appendix B1 of the Final EIR prepared for the Project except as adjusted in accordance with paragraph (a) or (b), below. The LAHD is in the process of developing a Greenhouse Gas Program. The Program shall be used for GHG-reducing projects and programs approved by the Port of Los Angeles. If that Program is established during the term of the Permit, the ~~Project~~ Tenant(s) and/or LAHD shall have the option to offset the required amount of GHG emissions through a funding contribution to the Greenhouse Gas Program rather than towards purchasing carbon offsets from a CARB-recognized registry. While the LAHD Greenhouse Gas Program is currently under development, the ~~Project~~ Tenant(s) and/or LAHD shall purchase and

	retire carbon offsets from a CARB-recognized offset registry as follows: Carbon offsets: The ~~Project~~ Tenant(s) and/or LAHD shall purchase and retire carbon offsets from a CARB-recognized registry to ensure that offsets will result in real, permanent, additional, quantifiable, verifiable, and enforceable reductions. The carbon offsets shall be verifiable and enforceable in accordance with the registry's applicable standards, practices, or protocols. The order of priority for purchasing (any one or more) carbon offsets shall be considered as follows: (i) Originating within the local area; (ii) Originating within the South Coast Air Basin; (iii) Originating within the state of California; or (iv) If sufficient local and in-state offsets are not available, conforming national offsets registered with a CARB-recognized registry ~~shall be purchased~~. Adjustment of the Project's Required Offsets through Other Verified GHG Emission Reductions: The ~~Project~~ Tenant(s) and/or LAHD may pursue the following modifications to the Project's total estimated GHG emissions identified in this measure. These modifications may be pursued in conjunction with or independent of each other on an up to annual basis. *(a) Adjustment in GHG Emissions* In the event of changes in activities, efficiency, reduced operations, regulations or for any other purpose, an adjustment of the required carbon offsets may be requested based on an evaluation of actual GHG emissions rather than future projected GHG emission calculations in the Final EIR. If the actual annual GHG emissions do not exceed the significance threshold of 10,000 MTCO2e per year, no carbon offsets shall be required. To adjust the required number of carbon offsets for purchase by the Tenant(s), the Tenant(s) shall make a request in writing to the LAHD for review and approval for the calendar year under consideration and shall submit a report within 60 days that quantifies the actual GHG emissions by an expert or an independent, qualified third-party. The evaluation of actual GHG emissions must be performed using acceptable industry standards and protocols for all sources that were included in the Project's GHG emissions calculations under Impact GHG-1. LAHD review shall occur within 30 days of receipt of the submitted report. Any expenses incurred by LAHD in processing the request, including retaining an independent third-party verifier to peer review the report, shall be borne by the Tenant(s). Alternatively, LAHD may implement a review for its own purpose, subject to the same quantification process described above, to adjust GHG emissions at any time during the life of the Project. or *(b) Implementation of Additional GHG Reduction Methods* In addition, the ~~Project~~ Tenant(s) may request a reevaluation of required carbon offsets to be purchased according to this paragraph. The Tenant(s) may implement different and additional GHG reduction methods if new technology and/or other feasible measures

	become available during the term of the Permit. To adjust the ~~Project's~~ required number of carbon offsets for purchase, the Tenant(s) shall identify such additional GHG reduction actions and must quantify the GHG emission reductions from these GHG reduction actions by an independent, qualified third-party verifier. Once the GHG reduction actions are found to be feasible and are reviewed and approved by LAHD staff, the Tenant(s) may request that LAHD reduce its required purchase of carbon offsets by the equivalent amount of demonstrated reduction. Any expenses incurred by LAHD in processing the request, including retaining a third-party verifier, shall be borne by the Tenant(s).
Timing	Payable during operations on an annual basis.~~During operations.~~
Methodology	LAHD will include ~~MM GHG-1~~this mitigation measure in Permit(s)~~lease agreement(s)~~ with Tenant(s). LAHD shall monitor compliance every 12 months during the term of the Permit(s). ~~LAHD shall monitor implementation of mitigation measures during operation.~~

Project Feature	**PF AQ-1: Zero-Emission Operational Equipment.** All yard equipment would be required to be zero emissions by January 1, 2030. Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. A 100 percent transition to zero emissions by January 1, 2030 shall be required, and any non-conforming equipment used or acquired after this date would be considered a breach of the Permit/Lease conditions.
Timing	Prior to January 1, 2030.
Methodology	LAHD will include this Project Feature in ~~lease agreement~~Permit(s) with Tenant(s).

Mitigation Measure	**MM AQ-1: Zero-Emission Cargo-Handling Equipment.** At the start of operation, Tenant shall utilize zero-emission ~~off-road~~ cargo-handling equipment (CHE) for Project operations. If the Tenant determines that specific CHE types cannot feasibly be deployed due to operational or infrastructure constraints, the Tenant shall provide a written report detailing the evidence and supporting documentation concerning feasibility and other relevant factors within 90 calendar days. The feasibility determination shall be subject to mutual agreement between the Board and Tenant, which shall not be unreasonably withheld by Tenant. All CHE operated on site shall be zero emissions starting January 1, 2030. In the event an ~~A~~applicable ~~L~~law comes into effect that requires the cargo-handling equipment used on site to be zero-emission equipment, the ~~A~~applicable ~~L~~law would govern.
Timing	At the start of operations or no later than January 1, 2030 depending on feasibility.
Methodology	LAHD will include this mitigation measure in ~~lease agreement~~Permit(s) ~~the permit~~ with Tenant(s).

3.3.6. Sea Level Rise

An analysis of issues associated with future sea-level rise (SLR) is not required by CEQA. However, this consideration of the Project's vulnerability to SLR and the potential consequences related to that vulnerability is presented in this EIR for informational purposes.

3.3.6.1. Background

The adverse effects of global climate change, including SLR, represent a risk to coastal communities and resources now and for the foreseeable future. Sea levels will continue to rise due to the ocean's sustained response to the warming that has already occurred, and this will occur even if climate change mitigation succeeds in limiting surface air temperatures in the coming decades. Accordingly, facility planning in coastal areas must incorporate a consideration of likely SLR.

For the *Port of Los Angeles, the Sea Level Rise Adaptation Study* noted that mean sea levels have already risen four inches in the past 100 years (LAHD, 2018). The study characterized SLR as "a significant risk that challenges the long-term viability of this national asset. If left unmitigated, business operations will be temporarily impacted, international cargo may move elsewhere, and community/commercial or natural habitat assets could be destroyed."

The following discussion addresses two types of effects on coastal resources and surrounding communities driven by SLR. First, flooding of a project site due to SLR alone or SLR combined with extreme high tides and/or storm surge damaging facilities, resulting in financial loss and even injury or death to workers and visitors. Second, damage caused by flooding could result in releases to the environment of, for example, structural elements, hazardous materials, cargos, and raw materials. These releases could involve harbor waters, as elements are washed away, or the air, as tanks or other containers ruptured by flood waters release volatile materials to the air. These possibilities are considered below to the extent they would apply to the Project.

3.3.6.2. Methodology

The most relevant studies of SLR are the *State of California Sea Level Rise Guidance: 2024 Science & Policy Update* (OPC/OST, 2024) and the Port's adaptation study (LAHD, 2018). Both studies recognize the uncertainty of SLR projections, particularly beyond approximately 2050, and offer multiple potential future scenarios of SLR under different assumptions of GHG emissions, ice cap melting, and other factors. The State's study recommends selecting a level of risk aversion (low, intermediate-high, or high) in order to select an appropriate future SLR scenario. For the Proposed Project, a medium-high risk aversion may be appropriate, as the Proposed Project may be less adaptive to medium to high consequences if impacted by SLR. The State's study uses a high-emissions assumption through 2100 to estimate SLR. The Port's SLR estimates, which are based on an earlier National Research Council study, do not include consideration of risk aversion levels but do incorporate a high-emissions scenario. The Port's study considers horizon years of 2030, 2050, and 2100 and three scenarios of global warming (low, mid-range, high). The Port's study focuses on Port infrastructure by predicting inundation and flooding under various scenarios of SLR, high tides, and storm tides, whereas the State's study is a more general consideration of SLR alone along the California coast. To evaluate the effects of SLR on a project, the State's study recommends considering project

lifespan when selecting SLR scenarios. The Proposed Project would be expected to have a maximum service life of 25 years and is therefore assumed to operate beyond the full buildout year of 2049 ~~until 2046~~ but not out to year 2100. Therefore, only 2050 SLR estimates are used to estimate SLR-related impacts for the Proposed Project. The State's study for the medium-high risk aversion level, high-emissions scenario (i.e., greatest SLR) at the Los Angeles tide gauge predicts SLR of approximately 0.9 ft higher than the 2000 level by 2050 (OPC/OST, 2024 – Appendix 2, Table 11). The Port's study projects that under the high-emissions scenario, the sea level at the Port could rise 24 inches above the 2000 level by 2050.

3.3.6.3. Discussion

The Port's study shows that SLR alone would not cause permanent inundation or shoreline overtopping at the Project site (LAHD, 2018). However, SLR with storm tide conditions could temporarily flood low lying areas within the Project site and access routes surrounding the site. The inundation could temporarily interrupt Project operations.

The Project would, like all port facilities, operate under various contingency and emergency prevention and response plans that would mandate shutdown of infrastructure such as gas lines and electrical facilities in anticipation of flooding. Accordingly, the presence of water on the site would not pose a serious risk of rupture or electrical hazard. Although traffic could be blocked by water depths of more than a few inches, vehicle movement should be able to resume quickly after waters have receded, which would be a matter of hours. Accordingly, SLR does not pose substantial structural risks to the Proposed Project or the alternatives, and no compensatory structural revisions are needed.

Neither the Proposed Project nor any of the alternatives include storage of hazardous materials in quantities that could be released. Containers would be stored on chassis and would be empty. Accordingly, damage to facilities caused by SLR scenarios would not adversely affect nearby facilities or communities.

3.3.7. Significant Unavoidable Impacts

~~No significant unavoidable~~ With mitigation, impacts related to GHG emissions for the Proposed Project would be less than significant. No other significant impacts would occur for GHG emissions ~~or sea-level rise would occur~~ during construction or operation of the Proposed Project or alternatives.

Section 3.4
Hazards and Hazardous Materials

Section Summary

Section 3.4, *Hazards and Hazardous Materials*, provides the following:

- A description of potential hazardous materials sites within and in the vicinity of the Project site;
- A description of Project site hazardous material history and previous hazardous material investigations;
- A description of local, state, and federal regulations and policies that apply to the Terminal Island Maritime Support Facility (MSF) Project (Proposed Project) and alternatives;
- A discussion on the methodology used to determine whether the Proposed Project or alternatives would result in a significant adverse impact regarding hazards and hazardous materials;
- An impact analysis of the Proposed Project and alternatives; and
- A description of mitigation measures proposed to reduce significant adverse impacts of the Project, including reasonably foreseeable direct, indirect and cumulative impacts relating to hazards and hazardous materials.

Key Points of Section 3.4

The Project site is underlain by existing soil and groundwater contamination due to its history of industrial uses, including use as a Naval Air Base and a petroleum coke storage and transfer facility. Numerous previous site investigations have been conducted on the site for the Los Angeles Harbor Department (LAHD) and former site occupants to characterize the soil and groundwater contamination underlying the Project area (LAHD, 2017). Ground disturbance related to construction of the Proposed Project could potentially expose people and the environment to adverse effects due to exposure to hazardous materials in contaminated soil and groundwater. The handling of hazardous materials could potentially result in exposure of workers and adjacent sensitive receptors to contaminants. Under the No Impact Alternative (Alternative 1), the Project site would remain unused and no ground disturbance would occur and therefore removal, handling, and reuse or disposal of the existing contaminated soil and groundwater would not occur. Under the Reduced Project Alternative (Alternative 2), construction-related ground disturbance would be the same as the Proposed Project, except scaled down due to the reduced footprint and thus would have a similar but reduced potential for adverse effects due to encountering contaminated soil and groundwater.

Construction-Related Impacts

Ground-disturbing activities for the Proposed Project, including trenching and excavation for utilities and structure foundations, and excavation for site regrading would encounter contaminated soil and at depths of 10 feet or greater would likely encounter contaminated groundwater. LAHD would conduct soil vapor,

soil, and groundwater testing prior to Proposed Project construction to characterize the waste for handling and reuse or disposal. As discussed in the Project Description (Section 2.5.2), LAHD ~~would~~ has prepared a Soil Management Plan (SMP) in compliance with applicable regulatory requirements to direct the management of the specific contaminated media that could reasonably be expected to be encountered at the Project site, and implementation of the plan would be a permit condition (see Final EIR Appendix D for the SMP; LAHD, 2026). Contaminated soil and groundwater would be properly handled, stored, transported off-site for disposal, or reused on site, if deemed suitable for industrial land use, and ~~disposed of~~ in compliance with the ~~approved~~ SMP~~,~~ and applicable California law, including handling as hazardous waste for soil meeting California's hazardous waste criteria. Additionally, the Project's construction bid specifications would require the development of a health and safety plan and appropriate disposal of excavated soil with no reuse for residential purposes. Under the No Project Alternative (Alternative 1), the Project site would remain unused, and no ground disturbance would occur, and therefore the existing contamination would not be encountered. Under the Reduced Project Alternative (Alternative 2), construction would also encounter contaminated soil and groundwater but to a lesser extent due to the smaller footprint with a commensurate decrease in ground disturbance.

Operations-Related Impacts

The Project site would be paved as part of Proposed Project construction and stormwater would be diverted to storm drains; therefore, operation of the Proposed Project and Alternatives 1 and 2 would not involve any ground-disturbing impacts or groundwater infiltration and would therefore have no potential to disturb or spread contaminated on-site soil and groundwater. Under the No Project Alternative (Alternative 1), no operational activities at the Project site would occur. Under the Reduced Project Alternative (Alternative 2), operational activities would be identical to the Proposed Project, but with reduced intensity due to the smaller footprint.

3.4.1. Introduction

This section includes a description of the existing baseline environmental setting, including existing hazards and hazardous materials in the Project area, and identifies the reasonably foreseeable and potentially significant adverse environmental effects that could result from implementation of the Proposed Project. The analysis in this section focuses on the potential for the Proposed Project to adversely affect human health and safety and the environment.

3.4.2. Environmental Setting

Hazardous Materials

Hazardous materials are defined by federal and state regulations that aim to protect public health and the environment. A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health or the environment. The term "hazardous materials" refers to both hazardous substances and hazardous waste. Under federal and state laws, any material, including wastes, may be considered hazardous if it is specifically listed by statute as such or if it is toxic (causes adverse health effects when ingested or absorbed), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), or reactive (causes

explosions or generates toxic gases). Hazardous materials are defined in the California Code of Regulations, Title 22, as follows:

> *[a] substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (CCR Title 22, Section 66260.10).*

Current and Historical Land Use

Current and past land use activities are commonly used as indicators of sites or areas where hazardous material storage and use may have occurred or where potential environmental contamination may exist. For example, many historic and current industrial sites have soil or groundwater contaminated by hazardous substances. Other common hazardous materials sources include leaking underground storage tanks (LUSTs) in commercial and rural areas, contaminated surface runoff from polluted sites, and contaminated groundwater plumes.

The Project site is located on Terminal Island within the Port of Los Angeles (POLA or Port). Project site elevations range from +13 to +17 feet Mean Lower Low Water (MLLW). Based on existing soil boring data (Jacobs, 2025) and prior environmental studies (LAHD, 2017), the groundwater elevation at the Project site is approximately +5 MLLW, which corresponds to a groundwater depth of approximately 8 to 12 feet below ground surface (bgs), with a typical depth of 10 feet bgs. Fluctuations in the level of groundwater may occur due to variations in rainfall, tidal fluctuation, and other factors.

The site is within an industrial environment consisting primarily of a mix of shipping and container storage uses. Properties to the immediate north and east consist of rail lines and roadways, to the south are rail lines, roadway, and a large container storage and shipping yard where containers are stored and transferred to trucks and rail for shipping. To the southwest are rail lines, roadways, the Terminal Island Water Reclamation Plant (a sewage treatment plant), and a petroleum product tank farm. To the west are rail lines, a roadway, truck parking/storage, a fire station (Los Angeles Fire Station 40), a large building that houses the U.S. Customhouse and shipping businesses, and a small building that has housed the offices of several different shipping related businesses.

The Project site is located in an area of Terminal Island that has had multiple land uses (LAHD, 2017), as follows.

- The Project area was designated as Allen Field starting in 1928 and used as a civilian combined land and sea airport, purportedly built by LAHD, and used an oil-surfaced runway, a pier, and a sea plane runway. A Naval Air Reserve Training Facility was also established there in 1927 (Denger, 2015).
- The U.S. Navy leased and acquired approximately 367 acres on Terminal Island in 1935, which included the Project area, for use as a Naval Air Base, named Reeves Field. The Naval Air Base included runways, hangars, numerous support buildings, a seaplane lagoon and ramp, underground storage tanks (USTs), and aviation fuel pipelines (LAHD, 2017). Reeves Field was disestablished in 1947, and the fuel pipelines were deactivated and abandoned in place (LAHD, 2017).

- The U.S. Navy leased of most of the area expired in the 1960s and over a period of time during the 1960s portions of the area were gradually released to LAHD, which used portions of the Project site for an asphalt and concrete crushing facility (LAHD, 2017). During the 1970s, portions of the Project site area were leased to the Los Angeles City Police Department for a training area and to the City of Los Angeles for sewage-sludge drying area.
- Construction activities at the Project site between the late 1970s and early 1990s included:
    - demolition and removal of U.S. Navy Reeves Field and all supporting structures between 1977 and 1980, including its fuel USTs with the exception of an 85-gallon fuel oil tank in the former runway area;
    - addition of fill material and paved automobile storage lots in the northern and central portions of the Project site that stored vehicles until at least 1989; and
    - leasing on the southern portion of the site for petroleum coke storage and transfer and the western portion for container refurbishing.
- During the early to mid-1990s, southern portions of the site were used to store dredged materials and to store imported fill for the Seaside Avenue/Navy Way Grade Separation Project.
- The LAXT Dry Bulk Handling Facility was constructed in the mid-1990s and began operating in 1997. Operations included receiving, storing, blending, conveying and loading ships with various grades of coal and petroleum coke. The coal and petroleum coke were received by rail and truck, ultimately conveyed via an above ground conveyor corridor to ships for transport (LAHD, 2017). The facility was fully demolished by 2010.
- Between 2010 and 2017 most of the Project site was a vacant dirt lot used for dredge or soil storage (Google Earth, 2024; EDR, 2024b). In 2018, the southeast corner of the Project site was paved with the rest remaining a dirt lot. In 2021, portions of the Project site were used for container storage and in 2022 more of the site (approximately half) was paved and also used for container storage. Currently, the site is primarily vacant with the southern half paved and the remainder unpaved.

Hazardous Waste and Substance Sites

Environmental Government Records Search. An environmental records database search was obtained for the Project site and surrounding area from Environmental Data Resources (EDR) and reviewed for sites at and near the Project site with the potential to have resulted in soil or groundwater contamination at the Project site (EDR, 2024a). Environmental databases were searched to a maximum distance of 1 mile from the Project site boundary, with some databases searched to lesser distances consistent with American Society for Testing and Materials (ASTM) standards for environmental site assessments. The EDR database search revealed 185 site listings within 1 mile of the Project site boundary. Many of the EDR site listings include data from more than one environmental database and many of the site listings may also represent the same geographic site with different owners/names.

A review of environmental database listings identified in the EDR database (~~Appendix C~~EDR, 2024a) reveals that most of the listings are for sites that generate, use, store, and/or transport hazardous materials that are not of environmental concern to the Project site due to the lack of several risk factors, including types and volumes of hazardous materials, location of the subject listing site, and lack of violations or known spills or leaks. Most of the listings/sites identified in the EDR database search are separated from the Project site by Harbor water bodies that soil or groundwater contamination could not have crossed and rail and roadway transportation corridors that would impede the lateral spread of soil contamination. Sites with no history of large spills or leaks, numerous violations, or existing contamination separated from the Project site by water bodies or several roads and rail lines were removed as potential significant contaminant sources and are not further discussed. However, several sites that are located at and near to the Project site were identified in the EDR database review that may have resulted in contaminants of concern in the soil or groundwater at the Project site and are summarized below.

- **Naval Air Base, Terminal Island.** One EnviroStor and two Formerly Used Defense Sites (FUDS) listings are identified for this site which is mapped within and covering the Project area. The EnviroStor and the FUDS listings is for the Small Arms Range for the Naval Air Base. This facility was used by the Navy as a fleet air base and included nearly one hundred buildings, including quarters, seaplane hangars, a garage, and a storehouse. Ordnance and explosive materials were stored in four separate buildings or shelters along the seaplane lagoon. This facility included multi-firing point skeet ranges, a machine gun butt, and a pistol range; however, these firing ranges were located north, northwest, and east of the Project site boundaries (USACE, 2007). The 2007 USACE site inspection (SI) report (USACE, 2007) for the former Naval Air Base at Terminal Island to discern the presence or absence of~~for~~ munitions and explosives of concern (MEC)~~, and~~ munitions debris (MD), and munitions constituents (MC). The SI included conducting a qualitative reconnaissance by traversing the site to gather general information about potential surficial presence of MEC, MD and MC. The SI investigation did not identify MEC or MD, and no affected MC media were found to be present onsite. This report concluded that munitions ~~indicates MEC and MD~~ are not likely a concern at the site due to the multiple phases of development that has since occurred ~~at the site~~ (USACE, 2007).

- **Former Long Beach Naval Complex (LBNC).** The Former LBNC is located on Terminal Island. It was comprised of the Long Beach Naval Station (LBNS) and the Long Beach Naval Shipyard (LBNSY), which operationally closed in 1994 and 1997, respectively. The Former LBNSY is approximately 1,200 feet east of the eastern boundary of the Project site. The LBNC operated historically as a U.S. Navy facility that included a shipyard, maintenance, and support operations. The site is a designated FUDS and has undergone environmental investigation and remediation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Naval Base Realignment and Closure (BRAC) programs. Environmental cleanup activities have addressed soil and groundwater contamination related to historical military and industrial uses. CERCLA requires a five-year review for remediated sites with residual contamination levels that are too high to allow unlimited use or unrestricted exposure (i.e., residential use). In December 2024, the Navy completed the fifth five-year review of environmental

cleanup actions at Installation Restoration Sites 1 through 6A and 8 through 14 (DoN, 2024). This review evaluated the implementation and performance of remedies and removal actions to verify that the remedies remain protective of human health and the environment for the current use of the site (DoN, 2024). The results of this fifth-year review indicate that the selected remedies at these sites provide current and future protectiveness of human health and the environment (DoN, 2024). Exposure pathways that could result in unacceptable risks are being addressed through institutional controls, and response complete has been achieved (DoN, 2024). These controls are effectively preventing exposure to site-related contaminants (DoN, 2024).

- **Koch Carbon Inc/Reeves Field Bulk Site –760 Ferry St.** This site address no longer exists but ~~appears to~~ correlates with the Project site and is related to the former carbon bulk storage operation at the project site. The EDR listing for this site only consists of an air emissions listing (CA EMI) and an industrial storm-water permit listing (CA CIWQS). No leaks, spills, or other environmental contamination are noted from these businesses at the Project site in the EDR database.
- **LAXT/Savage Pacific Services/Pacific Crane Maintenance Company – 750 Eldridge St.** This address is for the existing vacant office building on the Project site. The EDR database identified listings include a listing as a hazardous waste storage and disposal site, a small quantity hazardous waste generator, an industrial storage facility, and had several violations for minor oil spills from equipment and vehicles. No known existing contamination from these businesses at the Project site are noted in the EDR database.
- **Container Care/Central Container & Chassis – 600 S Ferry Street.** This address does not exist today but based on the EDR report mapping may correlate to one of the entrance roads to the Project site and thus may represent a former business at the Project site. EDR listings for this site include historical UST listings, a current UST listing with the UST listed as "Inactive", and an inactive hazardous material listing. No known environmental contamination is identified at this site in the EDR database.
- **Southwest Terminal/Torrance Logistics/Mobile Oil – 551 Pilchard St.** This site is located approximately 300 feet southwest from the Project site, south of Ferry Street and consists of a petroleum product above ground storage tank (AST) farm with seven ASTs and associated piping. The site is also listed as having an UST. No known environmental contamination is listed for this site in the EDR database.

Methane Zone. Most of the Project site is located within a City-defined methane zone and methane buffer zone, with the exception of the southwest portion of the site (LADBS, n.d.).

Previous Site Investigations. Multiple environmental investigations have been conducted at the Project site. The most recent environmental investigation was conducted in 2017 by Pacific Edge Engineering, Inc. (Pacific Edge), titled "Environmental Baseline Investigation", and included a review of previous investigations and sampling and testing of soil, soil vapor, and groundwater for contaminants of concern (LAHD, 2017). Contaminants of concern were identified based on the sites' historical use and past

environmental investigations. The LAXT Remote Storage Area occupies the majority of the Project site. Borings were conducted at locations evenly spaced across the LAXT Remote Storage Area, with no new borings in the area assessed in a previous 2016 Pacific Edge study due to no changed conditions (information from the 2016 borings were incorporated into the 2017 findings in LAHD, 2017). Of the borings conducted for this study in the Project area, nine had soil, soil vapor, and grab-groundwater samples collected, 13 borings had both soil and soil vapor samples collected, and the remaining borings had only soil samples collected.

All soil samples were analyzed for the following: total petroleum hydrocarbons (TPH) (C6-C44), Title 22 Metals, volatile organic compounds (VOCs) (including oxygenates), semi-volatile organic compounds (SVOCs) (including polycyclic aromatic hydrocarbons [PAHs]), polychlorinated biphenyls (PCBs), and organochlorine pesticides. In addition, one soil sample from each boring was also analyzed for PAHs using EPA Method 8310 because this test method has a lower detection limit for PAH analytes than the SVOC test method. Soil vapor samples were analyzed immediately by an on-site laboratory for VOCs, oxygenates, and gasoline range organics. The grab-groundwater samples were tested for TPH (C6-C44), Title 22 Metals, VOCs, Organochlorine Pesticides, PCBs, and SVOCs and PAHs (LAHD, 2017).

Pacific Edge compared detected contaminants of concern concentrations to various environmental screening levels (ESLs) to evaluate potential human health risks, to evaluate if disturbed soil could be reused, and to evaluate if potential groundwater dewatering during construction would comply with discharge requirements to a surface water body (ocean via storm drain). As referenced by the Los Angeles RWQCB, San Francisco Bay RWQCB Tier 2 Industrial Environmental Screening levels (February 2016) were used to compare to detected contaminants in soil, soil vapor, and groundwater, USEPA Regional Screening Levels (RSLs) (June 2017) were used for organochlorine pesticide contaminants in soil, California Human Health Screening Levels (CHHSLs) were used for soil vapor screening levels, LAHD Environmental Guidance for Industrial Soil was used for screening contaminants within soil, and Los Angeles RWQCB National Pollutant Discharge Elimination System (NPDES) discharge criteria were used to compare detected contaminants in groundwater to discharge requirements.

Results of the soil testing revealed a few compounds were detected at concentrations in soil that exceed the ESL criteria in some soil samples, including TPH (C6-C44), and SVOC (dimethyl phthalate), a PAH (benzo (a) pyrene), and several organochlorine pesticides; and exceeded the LAHD soil guidance criteria in some samples including for TPH (C6-C44), acetone (a VOC), three PAHs (benzo (a) pyrene, chrysene, and naphthalene), several metals, two PCB analytes, and several organochlorine pesticides. LAHD soil guidance criteria, which are based on regulatory requirements and screening levels from DTSC and the Los Angeles RWQCB (LARWQCB), are used to assess whether soil can be reused or imported to Port sites.

Several VOCs and gasoline range organics were detected at similar concentrations in most of the vapor samples collected at the site; however, all detected VOCs and gasoline range organics concentrations were significantly lower than the ESL and CHHSL values for health risks from vapor intrusion into a building structure.

Most grab-groundwater sample contaminant test results were below ESL and NPDES screening levels; however, TPH (C6-C44), arsenic, copper, and nickel, and a PCB analyte were detected in grab-groundwater samples at levels that exceeded ESL criteria, and

NPDES discharge criteria were exceeded for grab-groundwater samples for TPH (C6-C44) and a PCB analyte.

Chemicals detected during the Pacific Edge 2017 Baseline Investigation can typically be associated with the identified past site uses, and therefore, past site uses are likely sources of the detected contaminants. Soil vapor VOC concentrations detected during the baseline investigation were similar across the site, with no obvious or apparent source area observed; however, VOCs were not detected in soil or grab-groundwater samples. Pacific Edge concluded that the source of the soil vapor VOCs was likely not sampled and that solvents used at the previous airfield, which covered most of the site, may be a possible source (LAHD, 2017).

Based on the 2017 Baseline Investigation, Pacific Edge concluded that generally the potential for a human health risk is low based on the very few compounds detected at concentrations that significantly exceed the conservative screening values used (ESL/RSL/CHHSL), and the minor frequency of these detections (LAHD, 2017). Additionally, it was concluded that possible further contamination may exist at the site due to its size and many past industrial users, and that site redevelopment activities could encounter such contamination.

In 2024, Pacific Edge conducted a preliminary review of the 2017 soil vapor data at the Project site using the HERO Note 3 environmental screening levels (revised May 2022) and the DTSC-approved Attenuation Factor (AF) of 0.03 for future industrial buildings. The CHHSLs used as screening levels for the 2017 Baseline Investigation were phased out in 2018 and replaced by the DTSCs HERO Note 3 environmental screening levels. DTSC's HERO Note 3 provides VOCs in soil vapor screening levels for evaluating the potential risk of vapor intrusion into buildings. Based on this preliminary review of the 2017 data using DTSC's HERO Note 3 criteria (revised May 2022), a potential unacceptable human health risk for occupants of future commercial/industrial buildings may be present at the Project site.

VOCs are organic chemical compounds which have significant vapor pressures and can affect the environment and human health. VOCs are numerous, varied, and ubiquitous. Although VOCs include both man-made and naturally occurring chemical compounds, anthropogenic VOCs are regulated due to their potential health impacts, particularly in indoor environments where concentrations can reach higher levels. VOCs are typically not acutely toxic but can have chronic effects depending on the specific VOC and the level of exposure, such as cancer, respiratory problems, and immune system dysfunction.

Numerous previous investigations for the LAXT Remote Storage Area, which includes the majority of the Project site, as well as areas immediately adjacent to the Project site, were reviewed and summarized by Pacific Edge in its 2017 report. The relevant results and conclusions are summarized below (LAHD, 2017):

- **SCS Engineers, 1991. Phase II Site Investigation.** Soil borings were conducted for the formerly proposed Terminal Way expansion and three groundwater monitoring wells were installed. The investigation revealed groundwater at depths of 5-10 feet bgs and elevated TPH concentrations in soil attributed to petroleum coke, low levels of VOCs in the soil and groundwater.
- **Applied Geosciences, Inc., 1992. Phase I Site Assessment.** This study primarily identified areas of concern outside of and immediately south of the former LAXT Remote Storage Area (outside of the Project site) including USTs, fuel pits,

pipelines, water separators, and storm drains. Additionally, four 55-gallon drums were noted, some of which were located on the former LAXT Remote Storage Area; the drums contained waste oil, hydraulic oil, PCBs, and unknown materials. Applied Geosciences, Inc. indicated that Shaefer-Dixon Associates conducted a further assessment of the drums which indicated there was no evidence to suggest that these drums posed a concern for the former LAXT Remote Storage Area; however, these findings were not summarized in the 2017 Pacific Edge report

- **Chemical Waste Management, 1992. Analytical Report**. Sampling and analysis of liquid and sludge in underground substructures identified by Applied Geosciences, Inc. located just south of the LAXT Remote Storage Area (outside of the Project site) was conducted by Chemical Waste Management. Low concentrations of PCBs, lead, SVOCs, and VOCs were found in solids within storm drains and utility vaults. The storm drains, utility vaults and USTs were subsequently removed. An off-site fuel pit was found to contain petroleum product and was identified as a potential source of contamination to the adjacent soils.

- **Shaefer-Dixon Associates, 1992. Phase I Site Assessment.** The study was conducted for LAHD to identify potential contaminant sources at the LAXT Remote Storage Area. Several potential sources were identified including dredged fill materials, abandoned aviation fuel pipelines and associated water separators, potential soil contamination where former Reeves Field USTs and sump were removed, potential 85-gallon fuel oil tank not removed in former runway area, and remnant hazardous materials from former onsite buildings with hazardous materials use.

- **Geofon, Inc., 1992. Geotechnical Investigation**. Possible contamination was noted in one boring in the northeastern corner of the LAXT Remote Storage Area. The exact location of this boring is unknown but was assumed by Pacific Edge in its 2017 report to be near or at the former Railway Car Dump area located in the northeastern area of the LAXT Remote Storage Area.

- **Geofon, Inc., 1993. Soil and Groundwater Investigation.** This investigation was focused on the former Railway Car Dump area located in the northeastern portion of the LAXT Remote Storage Area. In the soil, TPH was detected at a maximum concentration of 100 mg/kg and trace amounts of VOCs and pesticides were detected. Only mercury and selenium were detected at concentrations slightly above NPDES requirements in the groundwater.

- **Shaefer-Dixon Associates, 1993. Baseline Site Characterization**. This investigation was conducted to determine soil and groundwater baseline conditions in the potential source areas identified by Shaefer-Dixon Associates during their 1992 Phase I assessment for the LAXT Remote Storage Area. The investigation included the collection and analysis of soil samples from new fill (from the mid-1980s) and original hydraulic fill at the former Reeves Field, and the installation and sampling of groundwater monitoring wells. Low levels of total fuel hydrocarbons (TFH) were detected in one sample, and elevated levels of TPH were detected in all samples from the new fill, and elevated levels of both TFH and TPH were identified at the former Container Refurbishing area in the original hydraulic fill. Soil samples from outside the former Container Refurbishing area were generally non-detect for TPH and TFH, with a few samples containing low levels of TPH

and TFH. No significant soil contamination was found at or near former structures associated with Reeves Field. Groundwater was encountered at 2.5 to 5-feet bgs and no obvious plumes of groundwater contamination was identified.

- **Tetra Tech, 1995. Soil Characterization Report.** Tetra Tech sampled stockpiled fill soil that was imported to the former LAXT Remote Storage Area for temporary storage for potential use at the Seaside Grade Separation Project and determined the fill did not contain compounds that would cause regulatory concern and was subsequently deemed adequate as construction fill.
- **Tetra Tech, 1998. Environmental Baseline Study – Surface Soils.** This baseline study was conducted to establish pre-LAXT operation soil conditions. Surficial soil samples were primarily collected at southern and northwestern portion of the former LAXT Remote Storage Area because the northeastern area was paved with concrete. VOCs and PCBs were not detected in any sample, except for one sample with a low VOC reading. Elevated TPH levels in the carbon range typical of asphalt and petroleum oils was detected in all samples. PAHs analytes associated with petroleum coke were detected in almost all samples.
- **The Source Group, Inc., 2005 and 2006. Site Characterization.** This investigation was conducted to evaluate surface and near surface soil at the LAXT Remote Storage Area; during the investigation the LAXT Dry Bulk Handling Facility (coal and petroleum coke) was in operation, which was generally located on the southern portion of the site. Elevated TPH concentrations were detected and PAHs were detected in approximately 15 percent of soil. Carcinogenic PAH concentrations were identified in engineered soil berms and unpaved areas present along the northern and southern boundaries of the coal handling area located within the southwestern portion of the Project site.
- **Locus, 2011. Baseline Environmental Site Characterization.** This study presented results of a soil and groundwater investigation conducted by The Source Group, Inc. in 2010 for the northeastern half of the former LAXT Remote Storage Area after significant quantities of surface material were removed from the site for site restoration and LAXT facility demolition. Elevated TPH concentrations were detected and VOC were only detected in a few soil samples consisting of low levels of naphthalene and toluene. Low concentration of SVOCs (phenol) were detected in two samples. Low levels of DDD, DDE, and DDT (pesticide contaminants) were detected in two soil samples. Elevated levels of TPH were detected in several grab-groundwater.
- **Pacific Edge, 2015. Stockpile Sampling**. Pacific Edge collected samples from an existing soil stockpile located at the central portion of the former LAXT Remote Storage Area and numerous small stockpiles located throughout the area. All detected TPH and metals concentrations were below the maximum concentration allowable for import/fill material, with the exception of one sample from a stockpile with elevated TPH concentration.
- **Pacific Edge, 2016. Limited Soil Screening Study.** This investigation focused on soil presumed to have been used to elevate the area after demolition of the LAXT Remote Storage Area in 2010. All samples were analyzed for TPH with carbon chain differentiation, metals, VOCs, SVOCs, organochlorine pesticides, and PCBs. PCBs, VOCs, and SVOCs were non-detect and metal concentrations

within ambient levels typically found in the Port environment. Elevated TPH levels were detected in all samples and low PAH concentrations were detected in several samples. Low DDE and DDD concentrations were detected in most of the samples.

3.4.3. Applicable Regulations

Several of the laws, policies, and regulations applicable to the Proposed Project and alternatives are designed to regulate hazardous materials and hazardous waste. These regulations also are designed to limit the risk of upset during the use, transport, handling, storage, and disposal of hazardous materials. The Project would be subject to numerous federal, state, and local laws and regulations including those described below.

3.4.3.1. Federal Regulations

Resource Conservation and Recovery Act (RCRA)

The goal of RCRA (42 U.S.C. Section 6901–6987), a federal statute passed in 1976, is the protection of human health and the environment, the reduction of waste, the conservation of energy and natural resources, and the elimination of the generation of hazardous waste as expeditiously as possible. The Hazardous and Solid Waste Amendments of 1984 significantly expanded the scope of RCRA by adding new corrective action requirements, land disposal restrictions, and technical requirements. The corresponding regulations in 40 CFR Sections 260–299 provide the general framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

CERCLA, commonly also known as Superfund, was enacted in 1980 to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA is codified in federal statute at 42 U.S.C. Section 9601 et. seq, and its corresponding regulations are found in 40 C.F.R. Part 307.

Clean Water Act (CWA)

The CWA is the principal federal statute protecting navigable waters and adjoining shorelines from pollution. The law was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. Since its enactment, the CWA has formed the foundation for regulations detailing specific requirements for pollution prevention and response measures. USEPA implements provisions of the CWA through a variety of regulations, including the National Contingency Plan, as described above, and the Oil Pollution and Prevention Regulations. Implementation of the CWA is the responsibility of each state.

Spill Prevention, Control, and Countermeasure (SPCC) Rule

As part of the CWA, the USEPA oversees and enforces the Oil Pollution Prevention regulation contained in Title 40 of the Code of Federal Regulations, Part 112, which is often referred to as the "SPCC rule" because the regulations describe the requirements for facilities to prepare, amend, and implement Spill Prevention, Control, and Countermeasure (SPCC) Plans. A facility is subject to SPCC regulations if a single oil (or gasoline, or diesel fuel) storage tank has a capacity greater than 660 gallons, or the total above ground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons, and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the "Navigable Waters" of the United States. The rule specifies that proactive, and not passive, measures be used to respond to oil discharges.

National Pollutant Discharge Elimination System (NPDES)

The NPDES permit program, created in 1972 by the CWA, helps address water pollution by regulating point sources that discharge pollutants to waters of the United States. The permit provides two levels of control: technology-based limits and water quality-based limits (if technology-based limits are not sufficient to provide protection of the water body). Under the CWA, USEPA may authorize state, tribal, and territorial governments to administer the NPDES permit program, enabling them to perform many of the permitting, administrative, and enforcement aspects of the NPDES program. In states authorized to implement CWA programs, USEPA retains oversight responsibilities. Within the state of California, the SWRCB issues both general permits and individual permits under the NPDES permit program.

3.4.3.2. State Regulations

Hazardous Waste Control Law

The Hazardous Waste Control Law, codified in California Health and Safety Code Sections 25100-25259, implements the federal RCRA cradle-to-grave waste management system in California. The California Environmental Protection Agency (Cal EPA) administers the California Hazardous Waste Control Law to regulate hazardous waste. The Hazardous Waste Control Law lists chemicals and common materials that may be hazardous; establishes criteria for identifying, packaging and labeling hazardous waste; prescribes management controls; establishes permit requirements for treatment, storage, disposal and transportation; and identifies some wastes that cannot be disposed of in landfills. DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. California hazardous waste regulations can be found in Title 22 California Code of Regulations Division 4.5, Environmental Health Standards for the Management of Hazardous Wastes.

California Health and Safety Code Section 25507 requires businesses that handle hazardous materials above certain thresholds to prepare and maintain a Hazardous Materials Business Plan (HMBP), which must include an inventory of materials, an emergency response plan, and employee training. The HMBP is submitted to the local Certified Unified Program Agency (CUPA) and must be updated regularly. The emergency response plan outlines procedures for containing and reporting accidental releases to protect public health, safety, and the environment. Under California Health and Safety

Code Section 25507, an HMBP is generally required if a business handles hazardous materials in quantities equal to or greater than 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases.

California Department of Toxic Substance Control (DTSC)

DTSC is a department of CalEPA and is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code. The hazardous waste regulations overseen by DTSC establish criteria for identifying, packaging, and labeling hazardous waste; prescribe management of hazardous waste; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous waste that cannot be disposed of in landfills.

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act provides a comprehensive water quality management system for the protection of California waters. The act designates the SWRCB as the ultimate authority over State water rights and water quality policy and established nine regional water quality control boards (RWQCBs) to oversee water quality at the local and regional level. The RWQCBs have the responsibility of granting NPDES permits and setting waste discharge requirements for stormwater runoff from construction sites. The proposed project's NPDES permits in California would be under the jurisdiction of the LARWQCB.

CCR, Title 8 – Occupational Safety

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety and promulgates regulations regarding worker safety related to the handling and use of hazardous materials (8 CCR Sections 5139-5223). Cal/OSHA standards are generally more stringent than federal regulations. Under California Labor Code Sections 6360 et seq., employers are required to inform employees regarding the hazardous substances they may be exposed to at the workplace. The regulations under Sections 6360 et seq. specify requirements for informing employees about hazardous substances in the workplace, maintaining and providing access to Safety Data Sheets (SDS), implementing a written hazard communication program, providing effective employee training, labeling hazardous materials, notifying employees of exposure, supplying appropriate protective equipment, and prohibiting retaliation against workers who seek information or report unsafe conditions.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Regulations implementing a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) address six elements: hazardous waste generators and hazardous waste on-site treatment; underground storage tanks (USTs); aboveground storage tanks; hazardous materials release response plans and inventories; risk management and prevention programs; and Uniform Fire Code hazardous materials management plans and inventories. The Unified Program requires CalEPA to certify local

government agencies, known as CUPAs as able to implement all the required environmental programs and to consolidate, coordinate and make them consistent within their jurisdiction. State partner agencies involved in the implementation of the Unified Program and providing technical assistance to CUPAs include CalEPA, the office of the State Fire Marshal, DTSC, and SWRCB. The CUPA for the Project area is the City of Los Angeles Fire Department (LAFD).

3.4.3.3. Local Regulations

City of Los Angeles General Plan

The City of Los Angeles General Plan Safety Element contains the following policies related to hazards and hazardous materials that are applicable to the Proposed Project (City of Los Angeles, 2021).

Policy 1.1.4. Health/Environmental Protection. Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation.

Policy 1.1.5. Risk Reduction. Reduce potential risk hazards due to disaster with a focus on protecting the most vulnerable people, places and systems

Policy 1.1.6. State and Federal Regulations. Assure compliance with applicable State and federal planning and development regulations. Regularly adopt new provisions of the California Building Standards Code, Title 24, and California Fire Code into the Los Angeles Municipal Code to ensure that new development meets or exceeds Statewide minimums. Ensure new development in Very High Fire Hazard Severity Zones adhere to the California Building Code, the California Fire Code, Los Angeles Fire Code and California Public Resources Code. Facilitate compliance with new standards for existing non-conforming structures and evacuation routes

Policy 3.1.2. Health/Safety/Environment. Develop and establish procedures for identification and abatement of physical and health hazards which may result from a disaster. Provisions shall include measures for protecting workers, the public and the environment from contamination or other health and safety hazards associated with the hazard in addition to abatement, repair, and reconstruction programs.

City of Los Angeles Local Hazard Mitigation Plan

The City of Los Angeles completed and adopted the most recent Local Hazard Mitigation Plan in 2024 (City of Los Angeles, 2024). The plan was approved by the Federal Emergency Management Agency and allows for federal grant funding eligibility to mitigate many of the natural hazards identified in the City of Los Angeles. The plan includes hazardous materials risk reduction strategies, focusing on safe storage, transport, potential releases, and coordinated emergency response to protect communities and the environment.

City of Los Angeles Municipal Code

Section 91.71, Methane Mitigation Requirements, of the City of Los Angeles Municipal Code (LAMC) identifies methane mitigation requirements for all projects that fall within

the "methane zone" or "methane buffer zone" (City of Los Angeles, 2025). In accordance with Section 91.7103 – General Methane Mitigation Requirements, all new buildings and paved areas located in a methane zone or methane buffer zone shall comply with the Methane Mitigation Standards established by the Superintendent of Building. LAMC Section 91.7104.1 requires on-site methane testing. The measured concentration and pressure of the methane gas shall be used to determine the site design level requirements per LAMC Section 91.7109.2 Table 71.

As described in LAMC Section 91.7104.2, Table 71 prescribes the minimum methane mitigation requirements, including passive, active, and miscellaneous systems, depending on the concentration and pressure of the methane present at the site. Each component of the passive, active, and miscellaneous systems shall be constructed of an approved material and shall be installed in accordance with the Methane Mitigation Standards.

Per LAMC Section 91.7106, the gas detection and mechanical ventilation systems per Table 71 shall be approved and enforced by the City of Los Angeles Fire Department. The fire department shall enforce the following: (1) maintenance and service procedures for each gas detection and mechanical ventilation system required per Table 71, which shall be performed by the building owner in accordance with the manufacturer's written instructions; (2) annual and maintenance testing in accordance with the Fire Prevention Bureau Requirement No. 71 and Fire Chief's Regulation 4, Section 4J; and (3) testing of the gas and mechanical ventilation systems shall be performed by a person with a valid Certificate of Fitness for Gas Detection Systems as set forth in LAMC Section 57.117.

Los Angeles Port Police Policy Manual

The Los Angeles Port Police Policy Manual Policy 412, Hazardous Material Response, establishes protocols to protect personnel and citizens during a situation involving suspected hazardous materials, such as at the scene of a traffic accident, chemical spill, or fire where the Port Police are notified (Los Angeles Port Police, 2024). This policy outlines steps to consider, notification and reporting requirements, and supervisor responsibilities.

Port of Los Angeles Risk Management Plan

The RMP, an element of the Port Master Plan (PMP), was most recently updated in 2018 (Port of Los Angeles, 2018). The policies of this plan are used in siting and expanding hazardous cargo facilities relative to high density populations and critical impact facilities. The RMP pertains primarily to marine terminals that accept crude oil, petroleum products, and chemicals. South Coast Air Quality Management District (SCAQMD) Rule 1166.

SCAQMD Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs. A site-specific plan is required for larger excavations and/or projects involving the handling/transportation of VOC-contaminated soils, such as sites where excavations involve more than 2,000 cubic yards of VOC-contaminated soil. Under Rule 1166, VOC-contaminated soil is a soil which registers a concentration of 50 parts per million (ppm) or greater of VOCs as measured before suppression materials have been applied and at a distance of no more

than three inches from the surface of the excavated soil with an organic vapor analyzer calibrated with hexane.

Water Resources Action Plan (WRAP)

In 2009, LAHD and Port of Long Beach (POLB), in cooperation with USEPA and LARWCQB, developed the WRAP (POLA and POLB, 2009) to implement programs to protect and enhance water and sediments in the harbors. The WRAP has two main objectives: (1) the Ports' need to achieve their broad mission to protect and improve water and sediment quality, and (2) the imminent promulgation by the LARWQCB and the USEPA of TMDLs for harbor waters and the associated CWA permits. The WRAP contains control measures to address four basic types of sources: land-use discharges (i.e., from terminals and other landside uses), on-water discharges (from vessels and in-water structures), sediments, and watershed discharges (i.e., uses outside of the Ports). The control measures consist of both improvements on current control measures such as housekeeping practices, best management practices (BMPs), and permit compliance programs, and the addition of new measures such as the development of standards, guidance materials, and new policies.

3.4.4. Impacts and Mitigation Measures

3.4.4.1. Methodology

The Project site and immediate surrounding area were evaluated for the presence of hazardous materials, that if present in sufficient concentrations in soil or groundwater, could result in environmental impacts to human health or the environment due to implementation of the Proposed Project or its alternatives. Current and past hazardous materials conditions of the Project site and surrounding areas, including an environmental database search (EDR, 2024a) and an environmental baseline investigation (LAHD, 2017) for the Project site that includes data from previous environmental investigations at the Project site, were reviewed to evaluate the potential for hazardous materials contamination of the soil and/or groundwater underlying the Project site.

3.4.4.2. CEQA Baseline

State CEQA Guidelines, Section 15125, subdivision (a), provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation (NOP) is published (Final EIR Appendix A). Since the NOP was released in December 2023, the LAHD has determined that 2023 is the baseline year for the CEQA analysis. In 2023, the baseline conditions for the Proposed Project includes the existing conditions of the site, which consists of an unoccupied, unused parcel. No construction or operations currently occur. The Proposed Project would represent a new use at the site and include temporary construction activities and generate new chassis and storage container facility activities.

3.4.4.3. Thresholds of Significance

State CEQA Guidelines Appendix G (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) CEQA Checklist suggests seven criteria for determining the significance of impacts related to hazards and hazardous materials:

Would the Project:

(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The Notice of Preparation/Initial Study (Final EIR Appendix A) eliminated criteria (a), (b), (c), (e), (f), and (g) from further consideration on the basis that the related impacts would either be less than significant or would not occur. Accordingly, the Proposed Project or alternatives would have a significant impact if it would:

HAZ-1: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, create a significant hazard to the public or the environment.

3.4.5. Impact Analysis

3.4.5.1. Proposed Project

Impact HAZ-1: Would the Proposed Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, create a significant hazard to the public or the environment?

Construction

The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (i.e., "Cortese List") maintained by the California DTSC (DTSC, 2024).

However, the Project site has a history of unknown soil and groundwater contamination from past uses of the site, including its former use as a petroleum coke storage and transfer location and potentially from its former use as a Naval Air Base. Components of the

Proposed Project where ground disturbance would occur would be susceptible to encountering environmental contamination in the underlying soil and groundwater. Previous site investigations at and adjacent to the Project site indicate elevated levels of TPH, VOCs, SVOCs, PAH, and several pesticides in the soil and TPH, arsenic, copper, nickel, and a PCB in the groundwater that exceeded regulatory screening levels and criteria at the time of testing. VOCs and gasoline range organics were detected in soil vapor samples in the previous site investigations at levels lower than the screening criteria at the time; however, this screening criteria has since been superseded. A preliminary review of the previous soil vapor data using current DTSC VOC soil vapor screening levels indicates that the levels may exceed human health levels for soil vapor intrusion in commercial/industrial buildings.

Ground-disturbing activities for the Proposed Project include excavation for utilities (electrical, stormwater, sewer and water), excavations for the canopy, and other structure foundations. Excavations encountering contaminated soil could potentially result in adverse effects to workers, the public, or the environment. While excavations related to regrading would be up to 5 feet, excavations for utilities and structure foundations could exceed 5 feet. LAHD would notify the Certified Unified Program Agency (CUPA) if previously unknown underground storage tanks are identified. Additionally, discolored soil, or other indications of potential contamination, encountered during grading or excavation activities would be managed in accordance with the SMP (Final EIR Appendix D; LAHD, 2026).

Groundwater in the Project area is shallow, at depths of approximately 8 to 12 feet (Jacobs, 2025), with a typical depth of 10 feet bgs (LAHD, 2017) and could therefore be encountered during excavations for utilities and structure foundations. Groundwater dewatering is not anticipated for the Proposed Project; construction activities may require limited dewatering or "working in the wet". If groundwater is encountered during construction activities, it would be managed in accordance with POLA dewatering specifications (POLA, 2025). Measures such as sand filtration and water retention systems would be implemented to ensure any groundwater removed during construction activities is properly contained on site and not discharged to nearby surface water.

Operation

The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962 (DTSC, 2024). Operation of the Proposed Project would not include any ground-disturbing activities, such that no existing soil or groundwater contamination would be encountered. However, soil vapor with levels of VOCs that exceed DTSC screening levels may be present and could pose a potential human health risk to workers from vapor intrusion into proposed buildings on the Project site. In addition, indoor activities occurring in the office/welfare buildings described in Section 2.5.2. have the potential for methane buildup, resulting in possible hazardous conditions for workers. Mobile fuel service trucks would provide diesel and propane for on-site equipment until 100 percent of yard equipment is transitioned to zero emissions by January 1, 2030. Mobile fuel service trucks would comply with all applicable local, state, and federal regulations, including requirements under the SPCC rule and California Code of Regulations for hazardous materials management.

Transport of diesel fuel would comply with regulations that apply to the shipment of hazardous materials on California highways and roads to ensure safe handling in general

transportation. Conformance with relevant laws and regulations would minimize the likelihood of hazardous material releases from the project. Soil vapor with levels of VOCs that exceed DTSC screening levels may be present and could pose a potential human health risk to future building occupants. In addition, the Project site is identified as being located within a City-defined methane zone and methane buffer zone, which represents a potential risk of methane gas soil vapor intrusion for future building occupants.

Impact Determination

Construction. The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962 (DTSC, 2024). Construction of the Proposed Project would not create a significant hazard to the public or environment related to the disturbance of a Cortese Listed Site.

The Project site is, however, identified as being located within a City-defined methane zone and methane buffer zone (LADBS, n.d.). Ground-disturbing activities during construction may have the potential to encounter elevated levels of methane gas, which could create a hazardous condition for construction workers. Compliance with LADBS General Methane Mitigation Requirements (LAMC Section 91.7103) would ensure that potential methane gas hazards are identified prior to construction and appropriate design measures are implemented to minimize potential hazards related to methane to construction workers and future Project site occupants.

LAHD would prepare a SMP in compliance with applicable regulatory requirements, and implementation of the plan would be a permit condition (Final EIR Appendix D; LAHD, 2026). The plan would identify known site contaminants, specify protocols for handling and managing contaminated media, including necessary personnel training, the use of appropriate personal protective equipment for construction personnel, stockpiling, and testing of excavated soils for off-site disposal at an appropriate licensed waste disposal facility, or reuse onsite if deemed suitable for industrial land use.~~, and appropriate containment and disposal at appropriate licensed waste disposal facilities.~~

In California, landfills are categorized by the types of waste they can accept: Class III landfills can accept non-hazardous solid waste, Class II landfills can accept designated wastes, and Class I landfills accept hazardous waste. The closest Port-approved nonhazardous (Class III) disposal facility to the Project site is Sunshine Canyon Landfill in Granada Hills (about 50 miles). The POLA does not have any approved Class II facilities. The closest Port-approved Class I hazardous waste facilities include Clean Harbors Buttonwillow (about 160 miles) and Waste Management Kettleman Hills (about 200 miles). As an alternative disposal method, soil could be hauled to a soil recycling facility, also known as a permanent thermal desorption unit, such as Soil Safe in Adelanto (100 miles from the Project site), which is permitted to treat SCAQMD Rule 1166 soils (i.e., VOC-contaminated soil). Final determination of the appropriate landfill would be determined by LAHD and its contractor(s) based on waste characterization data and other considerations.

Contaminated soil and groundwater would be properly handled, stored, transported off-site for disposal, or reused on site, if deemed suitable for industrial land use, ~~and disposed of~~ in compliance with the ~~approved~~ SMP~~,~~ and applicable California law, including as hazardous waste for soil meeting California's hazardous waste criteria. LAHD shall be responsible for complying with all requirements set forth in the SMP. Furthermore,

LAHD would comply with NPDES groundwater discharge requirements, and the Project's construction bid specifications would require as a standard practice the development of a health and safety plan and appropriate disposal of excavated soil with no reuse for residential purposes.

While the Project site is not included on the Cortese List and would implement a SMP as a permit condition, and comply with LADBS General Methane Mitigation Requirements, there remains a potential for contaminated soil, groundwater, or methane gas conditions to be encountered during construction of the Proposed Project. Therefore, impacts from contaminated soil, groundwater, and soil vapor would be potentially significant.

Operation. The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962 (DTSC, 2024). Operation of the Proposed Project would not create a significant hazard to the public or environment related to the disturbance of a Cortese Listed Site. However, preliminary review of soil vapor data from the Pacific Edge 2017 Baseline Investigation using current DTSC HERO 3 screening levels indicates that VOC soil vapor may pose a human health risk to occupants in buildings/enclosed structures on the Project site resulting in a potentially significant impact. ~~Implementation of MM HAZ-1 would ensure that contaminated soil, groundwater, and soil vapor in areas of Project disturbance and where proposed buildings and structures would be built are characterized to allow for implementation of appropriate handling, storage, and disposal, including use of suitable personal protective equipment by workers, as part of the SMP, and proper design of a vapor intrusion mitigation system (VIMS) and vapor monitoring, if needed. Additionally, compliance with the LADBS General Methane Mitigation Requirements (LAMC Section 91.7103), as enforced by the City of Los Angeles Fire Department, would reduce the potential for adverse health impacts to workers in Project site structures from methane. Therefore, impacts from soil vapor intrusion would be reduced to a less-than-significant level.~~

Mitigation Measures

MM HAZ-1: Characterize Soil, Soil Vapor, and Groundwater Contamination. Prior to construction, Los Angeles Harbor Department (LAHD) or its contractor shall conduct soil and groundwater sampling and testing in areas of Project ground disturbance. Soil and groundwater testing shall include, at a minimum, testing for total petroleum hydrocarbons (TPH), Title 22 metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), organochlorine pesticides, perfluoroalkyl and polyfluoroalkyl substances (PFAS), and any other contaminants of determined to be of concern. Analytical testing shall be performed by a laboratory certified by the Environmental Laboratory Accreditation Program. Any soil and groundwater determined to be contaminated would be handled, stored, transported, and reused or disposed of in compliance with the Soil Management Plan, and applicable California law, including as hazardous waste for soil meeting California's hazardous waste criteria. Contamination identified outside or along the boundaries of Project ground disturbance shall be managed only to the extent necessary to support construction activities, identify vapor intrusion potential at future buildings, and protect future occupants.

Once the final building locations and dimensions are known and prior to design, subsurface vapor sampling of VOCs, oxygenates, methane, and gasoline range organics, at a minimum, shall be conducted at the final building locations in conformance with

"DTSC/LARWQCB Site Characterization Advisory, Active Soil Gas Investigations" (2012, revision 2015). Vapor data should then be evaluated using Department of Toxic Substances (DTSC) 2011 "Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air" and the February 2023 "Supplemental Guidance: Screening and Evaluating Vapor Intrusion" to determine if a vapor intrusion mitigation system (VIMS) should be installed at the building locations. Soil vapor sampling and evaluation shall be conducted by an experienced licensed professional. If a VIMS is determined to be required, the Project design shall be modified to incorporate a DTSC-approved VIMS in all buildings. Ongoing VIMS monitoring, such as quarterly sampling of vapor probes installed above and below barrier, shall be conducted and results reported to South Coast Air Quality Management District.

Residual Impacts

As discussed above, known contaminated soil, soil vapor, and groundwater exist on the Project site. Project-related construction work would involve routine site preparation, grading, excavation, and infrastructure/building construction, during which known or not previously identified contaminated soils, soil vapor, and/or groundwater not previously remediated may be encountered.

Implementation of MM HAZ-1 would ensure that contaminated soil, groundwater, and soil vapor in areas of Project disturbance and where proposed buildings and structures would be built are characterized to allow for implementation of appropriate handling, storage, and reuse or disposal, including use of suitable personal protective equipment by workers, as part of the SMP (Final EIR Appendix D; LAHD, 2026), and proper design of a vapor intrusion mitigation system (VIMS) and vapor monitoring, if needed. Additionally, compliance with the LADBS General Methane Mitigation Requirements (LAMC Section 91.7103), as enforced by the City of Los Angeles Fire Department, would reduce the potential for adverse health impacts to workers in Project site structures from methane. Therefore, impacts from soil, soil vapor intrusion, and groundwater during construction and operations would be reduced to a less-than-significant level.

~~Implementation of MM HAZ-1 would characterize contaminated soil, soil vapor, and groundwater in the area of Project disturbance and where Project building and structures would be built to allow for implementation of the SMP, including appropriate handling, storage, and disposal, use of suitable personal protective equipment by workers, and proper design of a VIMS and vapor monitoring if needed.~~

~~Impacts from contaminated soil, soil vapor, and groundwater would be reduced to a less-than-significant level with implementation of MM HAZ-1 and compliance with LADBS General Methane Mitigation Requirements (LAMC Section 91.7103).~~

3.4.5.2. Alternative 1 – No Project Alternative

Under this alternative, the Project site would remain unused, and the current soil and groundwater conditions would remain unchanged. No ground disturbance would occur.

Impact HAZ-1: Would the No Project Alternative (Alternative 1) be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962 (DTSC, 2024). Under this alternative, the Project site would remain unused. As no ground disturbance would occur and no buildings would be constructed, the existing contaminated soil and groundwater underlying the Project site would not be handled or removed and soil vapor, including methane gas, would not intrude into an occupied structure. The existing soil and groundwater conditions under this alternative would remain the same as baseline conditions, as no construction or operational activities would occur.

Impact Determination

The No Project Alternative (Alternative 1) would not create a significant hazard to the public or environment related to the disturbance of a Cortese Listed Site. While the Project site contains contaminated soil and groundwater that could have the potential to impact the public and environment if a release of these substances occurs, under the No Project Alternative (Alternative 1) no construction or operational activities would occur and there would be no change to existing conditions. No impact would occur.

Mitigation Measures

Mitigation is not required.

Residual Impacts

No impacts would occur.

3.4.5.3. Alternative 2 – Reduced Project Alternative

In the Reduced Project Alternative (Alternative 2), the Project site area would be reduced from 89.2~~0~~ acres to 51.7 acres (71 acres [usable space]/2 + 16.2 acres other/outside loop) ~~40 acres~~, essentially utilizing half the usable space. Construction and operational activities would be identical to the Proposed Project, but with reduced intensity. Less ground disturbance for utilities, grading, and foundations would be required for the reduced Project footprint. Based on the 2017 Baseline Investigation by Pacific Edge, the reduced Project footprint would avoid some of the previously identified detections of soil contamination above LAHD soil guidance criteria (LAHD, 2017). However, not all exceedances identified in the 2017 data (e.g., selenium, dieldrin, aroclor-1254, and acetone) would be avoided, and some may remain within the reduced Project footprint. Furthermore, due to the Project Site size and history of industrial use, additional, previously unidentified contamination could still be present and may be encountered during redevelopment.

Impact HAZ-1: Would the Reduced Project Alternative (Alternative 2) be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962 (DTSC, 2024). Contaminated soil, soil vapor, and groundwater would be encountered for ground-disturbing activities under Alternative 2.

Impact Determination

Due to the reduced footprint for this alternative, substantially less ground disturbance would occur and the number of buildings and structures to be constructed and operated at the site would be reduced by about half. This would result in less contaminated soil and groundwater being encountered that would need handling and disposal as a hazardous material/waste. It would also result in fewer structures that could have soil vapor intrusion resulting in a human health risk.

Similar to the Proposed Project, LAHD ~~would~~has prepared a SMP in compliance with applicable regulatory requirements to direct the management of the specific contaminated media that could reasonably be expected to be encountered at the Project site, and implementation of the plan would be a permit condition (Final EIR Appendix D; LAHD, 2026). Any soil and groundwater determined to be contaminated would be handled, stored, transported, and disposed of in compliance with the SMP, and applicable California law, including as hazardous waste for soil meeting California's hazardous waste criteria. LAHD would also comply with NPDES groundwater discharge requirements, and the Project's construction bid specifications would require as a standard practice the development of a health and safety plan and appropriate disposal of excavated soil with no reuse for residential purposes.

Since the Project Site is located in a methane zone and methane buffer zone, compliance with the LADBS Methane Mitigation Standards would be required to ensure that potential methane gas hazards are identified prior to construction. Appropriate design measures would be implemented to minimize potential hazards related to methane to construction workers and future Project Site occupants.

While the Project site is not included on the Cortese List and would implement a SMP as a permit condition, and comply with LADBS General Methane Mitigation Requirements, there remains a potential for contaminated soil, groundwater, or methane gas conditions to be encountered during construction of the Reduced Project Alternative (Alternative 2). Therefore, impacts from contaminated soil, groundwater, and soil vapor would be potentially significant.

Mitigation Measures

MM HAZ-1: Characterize Soil, Soil Vapor, and Groundwater Contamination. Refer to Proposed Project for full mitigation measure text.

Residual Impacts

The Reduced Project Alternative (Alternative 2) would not create a significant hazard to the public or environment related to the disturbance of a Cortese Listed Site.

As with the Proposed Project, implementation of MM HAZ-1 would characterize contaminated soil, groundwater, and soil vapor in the area of Project disturbance and where Project building and structures would be built to allow for implementation of appropriate handling, storage, and reuse or disposal, including use of suitable personal protective equipment by workers, and proper design of a VIMS and vapor monitoring if needed.

Impacts from contaminated soil, groundwater, and soil vapor would be reduced to a less-than-significant level with implementation of MM HAZ-1 and compliance with LADBS General Methane Mitigation Requirements (LAMC Section 91.7103).

3.4.5.4. Summary of Impact Determinations

Table 3.4-1 summarizes the CEQA impact determinations of the Proposed Project and alternatives related to Hazards and Hazardous Materials. This table is meant to allow easy comparison of the potential impacts of the Proposed Project and alternatives. Identified potential impacts may be based on federal, state, or City of Los Angeles significance criteria, LAHD criteria, and the scientific judgment of the report preparers.

For each potential impact, the table provides the CEQA impact determinations, applicable mitigation, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

Table 3.4-1: Summary Matrix of Potential Impacts and Mitigation Measures for Hazards and Hazardous Materials

Alternative	Environmental Impacts	Impact Determination	Applied Mitigation Measures	Residual Impacts
Proposed Project	**HAZ-1:** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and create a significant hazard to the public or the environment.	Potentially Significant	**MM HAZ-1:** Characterize Soil, Soil Vapor, and Groundwater Contamination	Less Than Significant
Alt 1 – No Project		No Impact	Mitigation Not Required	No Impact
Alt 2 – Reduced Project		Potentially Significant	**MM HAZ-1:** Characterize Soil, Soil Vapor, and Groundwater Contamination	Less Than Significant

3.4.5.5. Mitigation Monitoring

MM HAZ-1 would be applied to the Proposed Project and Alternative 2 as a condition of approval. Mitigation is not applicable to Alternative 1 (No Project Alternative).

Mitigation Measure	**MM HAZ-1: Characterize Soil, Soil Vapor, and Groundwater Contamination.** Prior to construction, Los Angeles Harbor Department (LAHD) or its contractor shall conduct soil and groundwater sampling and testing in areas of Project ground disturbance. Soil and groundwater testing shall include, at a minimum, testing for total petroleum hydrocarbons (TPH), Title 22 metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), organochlorine pesticides, perfluoroalkyl and polyfluoroalkyl substances (PFAS), and any other contaminants of determined to be of concern. Analytical testing shall be performed by a laboratory certified by the Environmental Laboratory Accreditation Program. Any soil and groundwater determined to be contaminated would be handled, stored, transported, and reused or disposed of in compliance with the Soil Management Plan, and applicable California law, including as hazardous waste for soil meeting California's hazardous waste criteria. Contamination identified outside or along the boundaries of Project ground disturbance shall be managed only to the extent necessary to support construction activities, identify vapor intrusion potential at future buildings, and protect future occupants. Once the final building locations and dimensions are known and prior to design, subsurface vapor sampling of VOCs, oxygenates, methane, and gasoline range organics, at a minimum, shall be conducted at the final building locations in conformance with "DTSC/LARWQCB Site Characterization Advisory, Active Soil Gas Investigations" (2012, revision 2015). Vapor data should then be evaluated using Department of Toxic Substances (DTSC) 2011 "Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air" and the February 2023 "Supplemental Guidance: Screening and Evaluating Vapor Intrusion" to determine if a vapor intrusion mitigation system (VIMS) should be installed at the building locations. Soil vapor sampling and evaluation shall be conducted by an experienced licensed professional. If a VIMS is determined to be required, the Project design shall be modified to incorporate a DTSC-approved VIMS in all buildings. Ongoing VIMS monitoring, such as quarterly sampling of vapor probes installed above and below barrier, shall be conducted and results reported to South Coast Air Quality Management District.
Timing	Soil, soil vapor, and groundwater sampling and testing: Prior to Construction. Installation of a VIMS: During Construction.
Methodology	LAHD will include MM HAZ-1 in the contract specifications for construction.

3.4.6. Significant Unavoidable Impacts

No significant unavoidable impacts related to hazards or hazardous materials would occur during construction or operation of the Proposed Project or alternatives.

Chapter 4
Cumulative Analysis

Section Summary

This chapter evaluates the potential for the Proposed Project or an alternative, together with other past, present, and reasonably foreseeable future projects in the geographic scope of each resource area, to make a cumulatively considerable contribution to a significant cumulative impact.

Chapter 4, *Cumulative Analysis*, provides the following:

- A description of the existing environmental setting in the Port area;
- A description of the past, present, and foreseeable future projects in the surrounding area;
- An impact analysis of the cumulative impacts related to the Proposed Project and alternatives; and
- A description of any mitigation or project features proposed to reduce any potential impacts and residual cumulative impacts, as applicable.

Key Points of Chapter 4

The Proposed Project would construct and operate a chassis support facility at Terminal Island at the Port of Los Angeles (POLA or Port). Its operations would be generally consistent with other uses in the Project area, which include liquid bulk, dry bulk, and container terminals. The Proposed Project would make no cumulatively considerable contributions to significant cumulative impacts in the following resource areas under the California Environmental Quality Act (CEQA):

- Energy;
- Greenhouse Gas Emissions; and
- Hazards and Hazardous Materials.

The No Project Alternative (Alternative 1) would not contribute to any cumulatively considerable impacts as there would be no change in activity at the site, which under baseline conditions is negligible. The Reduced Project Alternative (Alternative 2) would not contribute to any cumulatively considerable impacts because it would have reduced construction activity and reduced on-site activity levels during operations.

4.1 Introduction

This chapter presents CEQA requirements for a cumulative impact analysis and analyzes the potential for the Proposed Project or an alternative to contribute to a cumulatively considerable effect when its impacts are combined with those of other past, present, and reasonably foreseeable future projects. Sections 4.1.1, *Requirements for Cumulative Impact Analysis*, and 4.1.2, *Projects Considered in the Cumulative Analysis*, respectively, present the requirements for the cumulative impact analyses and descriptions of the related projects. Section 4.2, *Cumulative Impact Analysis*, addresses each of the resource areas that were determined to result in potentially significant impacts in the Notice of Preparation/Initial Study (Final EIR Appendix A) and are analyzed in detail in this Final Environmental Impact Report (EIR).

4.1.1. Requirements for Cumulative Impact Analysis

State CEQA Guidelines Section 15130 requires a reasonable analysis of the cumulatively considerable impacts of the Proposed Project. Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (State CEQA Guidelines Section 15355).

Cumulative impacts are further described as follows:

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

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

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

In addition, as stated in the State CEQA Guidelines, Section 15064(h)(4):

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

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

4.1.2. Projects Considered in the Cumulative Analysis

Table 4-1 lists 35 recent, current, or reasonably foreseeable future projects (approved or proposed) identified within the general vicinity of the Project site that could contribute to cumulative impacts. The list was compiled from sources that include the Los Angeles Harbor Department (LAHD), the Port of Long Beach (POLB), the California Department of Transportation, the U.S. Army Corps of Engineers, and other local jurisdictions. The locations of these projects are shown in Figure 4-1 with project summaries in Table 4-1.

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

For the purposes of this EIR, the timeframe of current or reasonably anticipated projects extends from 2024 through 2045, and the Project vicinity is defined as the area over which effects of the Proposed Project could contribute to cumulative effects, which differs for each resource area. The cumulative regions of influence for individual resources are documented further in each of the resource-specific discussions in Section 4.2, *Cumulative Impact Analysis*.

Figure 4-1. Locations of Related and Cumulative Projects – REVISED

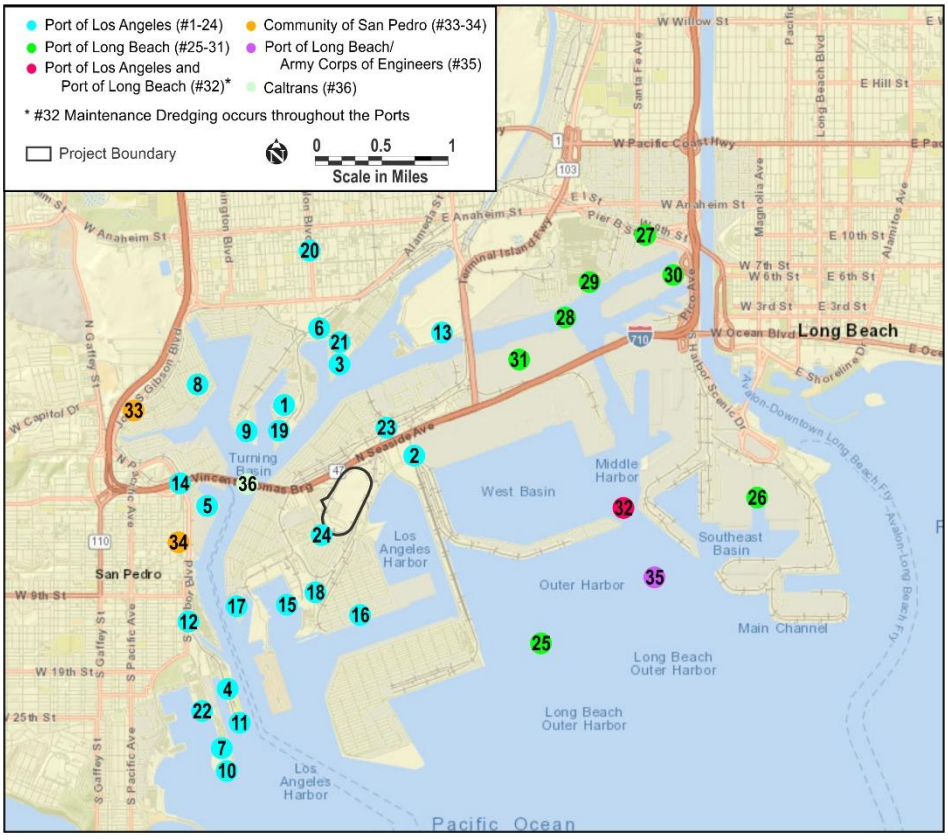


Table 4-1: Related and Cumulative Projects

No. in Figure	Project Title and Location	Project Description	Project Status
Port of Los Angeles Projects			
1	Berth 163-164 [Nustar-Valero] Marine Oil Terminal Wharf Improvements	Demolish the existing 19,000-square-foot timber wharf and construct a new steel and concrete loading platform, access trestles, mooring and berthing structures, and necessary utilities to comply with the Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS). The project also consists of a 30-year lease for the facility.	Initial Study (IS) /Mitigated Negative Declaration (MND) adopted September 2021. Construction is anticipated in 2028.
2	Navy Way/Seaside Interchange	Construct roadway improvements at SR-47/Navy Way to eliminate traffic signal and movement conflicts. Augment an existing partial interchange at SR-47/Seaside Avenue/Navy Way by removing the last traffic signal and at-grade intersection between I-170 and I-110, adding a new auxiliary lane and a new collector-distributor road, and implementing traffic channelization improvements. This project is included in the 2016 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as ID 1M0430.	Draft IS/MND released October 2024. Environmental review in process. Construction expected to begin December 2025 and end June 2028.
3	Berths 191-194 (Ecocem) Low-Carbon Cement Processing Facility	Construct and operate a dry bulk terminal for vessel unloading, raw material milling, and storage and loading onto trucks of low-carbon construction binder.	NOP released March 2022. Draft EIR released in October 2023. Final EIR Certified March 2025.
4	Westway Decommissioning	Decommission Westway Terminal along the Main Channel (Berths 70-71). Work includes decommissioning, removal of 136 storage tanks with total capacity of 593,000 barrels (bbl), and remediation of the site.	Decommissioning completed in 2013. Remedial action plan under development with LARWQCB.
5	Berths 97-109, China Shipping Development	Development of the China Shipping Terminal Phase I, II, and III including wharf construction, landfill and terminal construction, and backland development, including operation under a revised project to modify certain mitigation measures.	Construction completed in 2014. Final Supplemental EIR completed in 2019. ~~RSDEIR in preparation for ongoing operations~~Final Revised Supplemental EIR certified by the Board of Harbor Commissioners (Board) in November 2025. Errata approved March 2026, along with adoption of the Finding of Fact, Statement of Overriding Considerations, and Final Revised Mitigation Monitoring and Reporting Program.
6	Wilmington Waterfront Master Plan (Avalon Boulevard Corridor Project)	Intended to provide waterfront access and promote development specifically along Avalon Boulevard. Project elements include a promenade, waterfront park, pedestrian bridge, location for the Wilmington Youth Sailing and Aquatic Center, public pier, and other visitor serving uses.	Waterfront promenade completed in 2025. ~~Next phase of c~~Construction on the Avalon Pedestrian Bridge and Promenade Gateway ~~is anticipated in 2025-2028~~ commenced in February 2026.

No. in Figure	Project Title and Location	Project Description	Project Status
7	Berth 44 Boatyard	Redevelopment of the former San Pedro Boatworks site at 2945 Miner Street. Project components include demolition of existing structures and buildings on site; grading; paving; and construction of concrete pads, docks, gangways, slips, underground utilities, water treatment systems, storm drainage, fencing, lighting, and buildings for boatyard operations.	Environmental review in process. IS/NOP issued January 2024.
8	Berths 121-131 [Yang Ming] Container Terminal Improvements	Demolish existing wharf at Berths 126-129, construct a new wharf, install up to 10 new wharf cranes, recon-struct the shoreline, dredge and dispose of up to 310,000 cubic yards of sediments to deepen the berth, expand the existing on-dock railyard and install electric-powered RMG cranes for railcar loading/unloading.	NOI/NOP released in 2014. Draft EIR/EIS ~~in progress~~released in March 2026.
9	Berths 148-151 (Phillips 66) Marine Oil Termi-nal Improvement	Construct various wharf and seismic ground improvements that are required to comply with MOTEMS and a new 20-year entitlement.	IS/NOP released February 2023. EIR in progress.
10	Outer Harbor Cruise Terminal and Outer Harbor Park	Construct two new cruise terminals that would total up to 200,000 square feet (approximately 100,000 square feet each) and parking at Berths 45-47 and 49-50 in the Outer Harbor. The terminals would be designed to accommodate the berthing of a Freedom Class or equivalent cruise vessel (1,150 feet in length). A proposed Outer Harbor Park would en-compass approximately 6 acres at the Outer Harbor. This project was evaluated in the San Pedro Water-front Project EIS/EIR certified September 2009.	Request for Proposal for future development released in January 2023. Project is in design~~ with construction anticipated in 2026-2028~~.
11	City Dock No. 1 Marine Research Project (AltaSea)	Development of a marine research center within a 32.13-acre area located between Berths 57-72. This project would change the break bulk areas east of East Channel (Berths 57-72) to institutional uses.	Phase I development in progress since 2017.
12	West Harbor Modification Project (formerly San Pedro Public Market)	Redevelopment of 30 acres, formerly known as the Ports O' Call Village, with up to 300,000 square feet of visitor-serving commercial uses and up to a 75,000 square feet conference center. This project would involve changing the industrial uses along Harbor Boulevard to commercial. This project also includes a waterfront promenade and three acres of open space. This project was evaluated in the San Pedro Waterfront Project EIR/EIS and subsequent Addendum. The revised project environmental anal-ysis includes a 108,000-square-foot outdoor amphi-theater, a more than 30,000-square-foot public lawn and park, a 2.5-acre entertainment venue, a 100-foot diameter Ferris wheel with an approximately 150-foot-tall by 50-foot-wide tower attraction, and other visitor-serving commercial uses. Construction of this project would generate over 300 jobs, and operation would sustain approximately 230 permanent jobs across hospitality, retail, and entertainment. Labor would be sourced from surrounding communities when possible through partnerships with local organi-zations and workforce programs. This project was evaluated in the San Pedro Waterfront Project EIS/EIR certified September 2009.	BHC certified the Final EIS/EIR and approved the project in 2009. Addendum 1 in May 2016 and Addendum 2 in November 2019. IS/NOP for a ~~Supplemental~~ Subse-quent EIR was released April 2022. Construction of prome-nade, town square, floating docks, and landscape/ hardscape improvements completed. Construction of restaurant buildings to be completed in 2025. Draft Subsequent EIR released November 2024 for new phases of development. Con-ceptual planning and design in progress by private devel-oper. Final Subsequent EIR to the San Pedro Waterfront Project Environmental Impact Report for the West Harbor Modification Project (SCH No.

No. in Figure	Project Title and Location	Project Description	Project Status
			2005061041) certified by the Board on June 26, 2025. On September 10, 2025, the City Council rejected an appeal and reaffirmed the Board's certification.
13	Goods Movement Workforce Training Facility	Development of an approximately 20-acre site at 1400 East Anchorage Road for a goods movement workforce training facility.	Environmental review in process; NOP released February 2024. Project is in design with construction anticipated in 2027-2029.
14	SR-47/Vincent Thomas Bridge & Front Street/Harbor Boulevard Interchange Reconfiguration	Reconfigure existing interchange at SR-47/Vincent Thomas Bridge and Harbor Boulevard/ Front Street to improve safety and operation for vehicles exiting the highway. Improvements also include modification of the eastbound entrance ramps and modification of Harbor Boulevard and Front Street approaching and between the ramp termini.	Construction ongoing ~~through 2026~~ from October 2025 to March 2027.
15	Al Larson Boat Shop Improvement	Modernize existing boat yard and 30-year lease extension.	Final EIR certified in 2009. Project on hold.
16	Berths 302-306 [APL now known as Fenix Marine] Container Terminal	Improve and expand the existing terminal, including the addition of cranes, modifications to the main gate, converting an existing dry container storage unit to a refrigerated unit, and the expansion of the terminal onto 41 acres adjacent to the existing terminal. Revised project includes continued operations with minor modifications to the terminal and a 15-year lease extension through 2043.	Evaluated in Final EIR/EIS in 2012 and an Addendum in 2016. Expansion project on hold; revised project ongoing.
17	Berths 238-239 [PBF Energy] Marine Oil Terminal Improvement	Demolish the existing Berth 238 loading platform, construct a new platform and associated mooring structures at Berth 238, and install landside improvements.	Construction pending; anticipated in 2025-2027.
18	Star-Kist Cannery Facility	Demolish 14-acre site for future use as cargo support or container chassis storage.	MND adopted February 2023. ~~Construction anticipated in 2025-2026.~~Construction started Q1 2026.
19	Berths 167-169 [Shell] Marine Oil Terminal Wharf Improvements	Various wharf and seismic ground improvements that are required to comply with MOTEMS, as well as other landside elements and a new 30-year lease.	Final EIR certified in 2018. Construction is anticipated to continue through 2026.
20	Avalon and Fries Street Segments Closure	Permanent physical closure of segments of Avalon Boulevard and Fries Avenue by installing street modifications that include cul-de-sac, curbs and gutters, and fencing and signage.	Construction pending.
21	Berths 187-191 (Vopak) Liquid Bulk Terminal Wharf Improvements and Cement Terminal	Various wharf and improvements that are required to comply with MOTEMS, improvements to an adjacent wharf to facilitate resumption of cement terminal operations on the site, and a new 30-year entitlement.	IS/NOP issued July 2022. EIR in preparation (not yet issued).

No. in Figure	Project Title and Location	Project Description	Project Status
22	Cabrillo Way Marina	Develop, operate, and maintain a marina, hotels, boater and visitor-serving club and meeting facilities, restaurants, retail buildings, and commercial areas at 2293 Miner Street. Evaluated in the West Channel/Cabrillo Marina Phase II Development Project (Cabrillo Way Marina).	Final Supplemental EIR certified December 2003. Request for qualifications for contractors released in 2019. Environmental review in process.
23	SA Recycling Amendment to Permit No. 750	Project is located at 901 New Dock Street on Terminal Island, 90731. Project seeks an amendment to Permit No. 750 to allow for an up to 10-year extension of existing operations, with up to 5 additional years for use of the site as a non-operational restoration period for any necessary closure and remediation activities to restore the property.	Environmental review in process; Final Subsequent EIR approved by the Board ~~of Harbor Commissioners~~ April 2024. Project is in operation.
24	Terminal Island Grade Separation Project	Close the existing tunnel/crossing and create a new 2,000-foot-long four lane, grade-separated roadway over POLA mainline tracks with connecting roadway approaches on both ends. Construction would include a 115-foot span bridge, retaining walls, embankment fill, grading, paving, landscaping, and traffic signal modifications at the intersection of Ferry St. and Terminal Way.	Notice of Exemption processed January 2024. Construction anticipated to begin in Q2~~1~~ 2027~~6~~.
Port of Long Beach Projects			
25	Pier Wind Terminal Development Project	Project involves the construction and development of 430 acres of new land for a terminal (Pier Wind Terminal) and transportation corridor. Construction of the terminal and transportation corridor would be completed in two phases over approximately 9 years beginning in 2027 with completion expected in 2035.	Environmental review in process; IS/NOP/NOI released November 2023.
26	Piers G & J Terminal Redevelopment	Develop a marine terminal of up to 315 acres by consolidating two existing marine container terminals on Piers G and J and several surrounding parcels. Construction would occur in four phases over an 11-year period and includes approximately 53 acres of landfills, dredging, concrete wharves, rock dikes, and road and railway improvements.	Project approved September 2000. Construction ongoing.
27	Pier B On-Dock Rail Support Facility	Expand the existing Pier B Rail Yard in two phases, including realignment of the adjacent Pier B Street and utility relocation.	Final EIR certified February 2018. Construction pending; expected to begin in 2024 and to be completed by 2032.
28	Southern California Edison Transmission Tower Replacement	Replace a series of transmission towers across the Cerritos Channel.	Final EIR certified in 2017. Construction of new towers completed August 2021. Demolition of old transmission tower in-water footings underway.
29	Toyota Facility Improvements	Construct a new consolidated vehicle processing and distribution center, hydrogen fuel cell and generator facility, and fueling station. Demolition of some existing facilities.	IS/MND adopted in 2018. Construction completed September 2023.

No. in Figure	Project Title and Location	Project Description	Project Status
30	World Oil Tank Installation Project	Installation and operation of two 25,000-bbl petroleum storage tanks at 1405 Pier C Street.	Environmental review in process. EIR issued September 2024.
31	Pier S Battery Energy Storage System Project	Construction and operation of a 70-megawatt (MW) battery energy storage system (BESS) on approximately 2.9 acres of the existing, privately-owned power generation site on Pier S.	Draft IS/MND released December 2024.
POLA and POLB Projects			
32	Maintenance Dredging and Structure Repair	Routine removal of accumulated sediment from channel beds to maintain the design depths of navigation channels, harbors, marinas, boat launches, and port facilities. Conducted regularly for navigational purposes. Also, routine in-kind maintenance and repairs of structures.	Dredging intermittently initiated on average every 3-5 years; at least once every 5 years. Inter-mittent structure repairs.
Community of San Pedro Projects			
33	John S. Gibson Truck & Chassis Parking Lot Project	Development of a fully paved, striped, and fenced 393-stall container parking lot to be used for loading/unloading and parking of shipping containers on 18.66 acres at 1599 W. John S Gibson Boulevard. The project includes a total landscape planting area of 9.35 acres, including a landscaped wall area.	IS/NOP issued October 2023. DEIR released November 2024.
34	Pacific Corridors Redevelopment	Development of commercial/retail, manufacturing, and residential components at cross streets Gaffey and Pacific Avenue. Construction underway of four housing developments and Welcome Park.	Project underway. Estimated to be completed in 2032 according to City of Los Angeles Planning Department.
POLB/U.S. Army Corps of Engineers Projects			
35	Port of Long Beach Deep Draft Navigation and Main Channel Deepening	Dredge up to 10 million cubic yards of material to deepen channels, basins, and standby areas to improve waterborne transportation efficiencies and navigational safety for vessel operations. A new dredge substation will be constructed to provide electricity to dredge equipment.	POLB NEPA EIS Record of Decision issued July 2022; CEQA EIR certified by POLB September 2022. Construction estimated to commence in 2027
~~Alameda Corridor Transportation Authority and~~ Caltrans Projects			
36	~~SR-47~~ Vincent Thomas Bridge Deck Replacement	Bridge repairs includ~~e~~ing replacement of bridge deck, median concrete barrier and guardrails, and upgrading of seismic sensors.	Final EIR approved October 2024. Construction anticipated in 2026-2028.

Source: Caltrans, 2023a, 2023b; CEQAnet, 2000, 2001, 2020, 2022; Construction Journal, 2022; Pacific Maritime Magazine, 2023; POLA, 2018, 2023a, 2023b, 2024, 2025; POLB, 2020 2022, 2023; PR Newswire, 2019; SCAG, 2020; Urbanize Los Angeles, 2018; USACE, 2019; N.D.

4.2 Cumulative Impact Analysis

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

- Alternative 1 – No Project Alternative
- Alternative 2 – Reduced Project Alternative

The cumulative impact analysis considers the resources that are analyzed in Chapter 3, *Environmental Analysis*, of this EIR. The Initial Study (IS) determined that construction and operation of the Proposed Project may have significant impacts related to air quality, energy, greenhouse gases (GHG), and hazards and hazardous materials that would be potentially cumulatively considerable. Accordingly, these issues are further evaluated in this cumulative impact analysis. In addition, the IS identified less-than-significant impacts related to Aesthetics, Biological Resources, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Transportation, and Utilities and Service Systems. As such, potential cumulative impacts of these resource areas are discussed briefly below.

Aesthetics. The Project area and vicinity are characterized primarily by views of industrial infrastructure, heavy equipment, highly developed uses, and the Pacific Ocean. The visual character in the vicinity of the Project area is already not considered to be sensitive or significantly affected due to the extensive industrialized development. Like the Proposed Project, the cumulative projects identified in Table 4-1 would generally result in visual impacts that are consistent with the existing use and nature of the Port and not significant. The Proposed Project's contribution to aesthetics would not be cumulatively considerable.

Biological Resources. The Project vicinity and overall Port are highly developed, with little natural terrestrial habitat or native vegetation to support biological resources. Past, present, and reasonably foreseeable future projects would be required to comply with existing laws and regulations such as the Migratory Bird Treaty Act, Clean Water Act, and Porter-Cologne Water Quality Control Act, and Fish and Game Code Section 1600 *et seq.* The Project site is disturbed and contains non-native vegetation, and the Proposed Project would not result in any significant impacts to biological resources. The Proposed Project's contribution to biological resources would not be cumulatively considerable.

Geology and Soils. While the Project area is in a seismically active region, seismic and geologic impacts are typically site-specific and limited to individual project sites. The impacts of projects identified in Table 4-1 would be specific to each project's respective site and would not contribute to impacts to other sites. Furthermore, these projects would be required to comply with local, State, and federal construction guidelines and standards to protect public safety. The only project at the Project site that has the potential to result in cumulative geology and soils impacts in combination with the Proposed Project is the Terminal Island Grade Separation (#24). However, both the Proposed Project and the projects identified in Table 4-1 are located on the relatively flat land of the Port Complex with no potential for landslides, artificial fill, and would follow erosion and sediment control requirements during construction. Therefore, Proposed Project impacts would not

have a potential to combine with similar effects from other projects and would not be cumulatively considerable.

Hydrology and Water Quality. The geographic scope for hydrology and water quality would include projects near the Project site that involve construction and ground disturbance. Combined, these projects could have impacts related to stormwater contamination, runoff, or spills. Nearby projects include Navy Way/Seaside Interchange (#2) and SR-47/Vincent Thomas Bridge & Front Street/Harbor Boulevard Interchange Reconfiguration (#14). Like the Proposed Project, these projects would comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) Stormwater Program and implement construction best management practices, as applicable. Therefore, Proposed Project impacts would not have a cumulatively considerable impact.

Land Use and Planning. Cumulative impacts may occur if the Proposed Project combined with other nearby projects, and would conflict with existing land uses resulting in significant environmental impacts. The Proposed Project would require a Port Master Plan amendment, changing the Project site's land use designations from Maritime (23.6 acres), Liquid Bulk (53.3 acres), and Container (12.3 acres) to a dual designation of Container and Maritime Support for the area within "the loop" ~~full 89.2-acre site~~. This land use change and proposed operations would be consistent with the surrounding maritime support uses in Planning Area 3, which focus on container operations. The Proposed Project would provide better support for this use by improving the efficiency of terminal operations and optimizing the use of existing land to support chassis storage and handling of empty wheeled containers. Therefore, the Proposed Project would not contribute to a land use and planning conflict that is cumulatively considerable.

Noise. Cumulative noise impacts would typically occur if the Proposed Project's noise impacts combined with cumulative projects within approximately 0.25 mile, as well as the potential for combined increases in traffic noise. Cumulatively considerable noise impacts would occur if there are sensitive receptors near the Proposed Project and nearby cumulative projects. The Terminal Island Grade Separation (#24) is the closest project to the Proposed Project and would have an overlapping construction schedule with the Proposed Project. The nearest sensitive receptors to the Project site are liveaboards in Newmarks Yacht Centre, approximately 1 mile north of the Project site, and residential areas in San Pedro approximately 1.2 miles west of the Project site. Construction of the Proposed Project and Terminal Island Grade Separation would occur Monday through Friday between 7:00 a.m. and 4:00 p.m., or between 8:00 a.m. and 4:00 p.m. on Saturdays, which would comply with Los Angeles Municipal Code Section 41.40, which restricts construction noise between 9:00 p.m. and 7:00 a.m. and within 500 feet of noise sensitive land uses (residences, hotels, or other places of residence). Operational activities may cause an increase in on-site operational noise; however, given the distance to the closest residential receptors these activities would not change ambient noise conditions. The primary operational noise source would be generated from the diverted truck trips to the Project site and workers commuting to the site, which would utilize the new grade separation. Incremental changes in noise from vehicles along transportation routes would attenuate over distance; resulting noise levels would not exceed any local noise ordinance thresholds and therefore would not be cumulatively considerable.

Public Services. The geographic scope for cumulative effects on public services is the area that includes the cumulative projects identified in Table 4-1 that would be served by

the same public service providers. Of the cumulative projects, Pier Wind Terminal Development Project (#25) has the greatest potential to induce population growth by attracting workers to the area, thus potentially increasing the need for public services. However, the Proposed Project would not induce population growth, and with the availability of multiple public services and varying construction schedules, the Proposed Project would not result in a cumulatively considerable effect on public services.

Transportation. The geographic scope for cumulative impacts to transportation primarily includes local roadways as well as pedestrian facilities and bicycle paths that may serve the Proposed Project. Other cumulative projects that would utilize the same roadways as the Proposed Project may include Navy Way/Seaside Interchange (#2), Star-Kist Cannery Facility (#18), ~~and~~ Terminal Island Grade Separation (#24), and Vincent Thomas Bridge Deck Replacement (#36). Navy Way/Seaside Interchange and Vincent Thomas Bridge Deck Replacement construction may coincide with the Proposed Project and other ongoing projects in particular, as lane closures are likely to occur and affect transportation and traffic patterns. However, the project would be required to coordinate with the public and/or Caltrans to reduce transportation conflicts. In addition, although the Proposed Project would increase trucking activity at the Project site, truck trips during operations would be diversions of existing truck trips and would not exacerbate truck traffic volumes. Therefore, the impacts of the Proposed Project would not result in a cumulatively considerable effect on transportation.

Utilities and Service Systems. The geographic scope for cumulative effects on utilities is the area that includes the cumulative projects listed in Table 4-1 that would be served by the same utilities as the Proposed Project. Of the cumulative projects, Pier Wind Terminal Development Project (#25) has the greatest potential to induce population growth by attracting workers to the area, thus potentially increasing the need for expanded utilities and service systems. However, the Proposed Project would not induce population growth. With the availability of existing utility providers and connections and various construction schedules among the cumulative projects, the Proposed Project would not result in a cumulatively considerable effect on utilities and service systems.

4.2.1. Air Quality and Health Risk

4.2.1.1. Scope of Analysis

The region of analysis for cumulative effects of air emissions (Cumulative Impacts AQ-1 and AQ-3) is the South Coast Air Basin (SCAB). For evaluating localized effects of air quality through ambient pollutant concentrations (Cumulative Impacts AQ-2 and AQ-4), the Southern California Air Quality Management District (SCAQMD) typically assesses cumulative projects within one mile of a Project site. For health effects (Impact AQ-5), the area of influence includes the cumulative projects within the Port Complex (the Ports of Los Angeles and Long Beach) and their effects on the surrounding communities of San Pedro, Wilmington, and Long Beach.

4.2.1.2. Existing Cumulative Condition

The SCAB experiences nonattainment conditions for ozone and particulate matter, largely due to high regional population density, the vast number and wide range of types of emission sources, and the topographical and meteorological conditions that foster formation and limit dispersion of ambient air pollutants. The existing air quality condi-

tions of the SCAB occur in connection with the effects of past projects and the effects of other current projects, and nonattainment conditions may be exacerbated by the effects of probable future projects. Because of the existing regional air quality conditions, in connection with the effects of cumulative projects, the existing regional cumulative air quality impact is significant.

Elevated levels of cancer risk and adverse health effects occur in proximity to the Port Complex due to a wide range of sources related to past projects and other current projects, including the operational activities of the San Pedro Bay Ports (SCAQMD, 2021). The elevated levels of air pollution that can occur in this area of the SCAB are associated with cancer risk and other adverse health effects, including asthma, bronchitis, reduced lung function, and increased mortality and morbidity. Because of these adverse effects, the existing localized cumulative air quality impact is significant.

4.2.1.3. Cumulative Impact Analysis

Cumulative Impact AQ-1: Would construction of the Proposed Project or alternatives result in emissions that would make a cumulatively considerable contribution to a significant cumulative impact from exceedance of the SCAQMD regional thresholds of significance for construction emissions?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Construction of the Proposed Project would span approximately 24 months. Several large or moderate-sized construction projects could occur concurrently at the Port and surrounding areas (Table 4-1) including, the Navy Way/Seaside Interchange (#2) located adjacent to the Proposed Project. Other related projects that could be under construction simultaneously include the Vincent Thomas Bridge Deck Replacement (#36), Pier B On-Dock Rail Support Facility (#27), and the Deep Draft Navigation and Channel Deepening (#35).

The construction impacts of the related projects would be cumulatively significant if their combined construction emissions would exceed the SCAQMD daily emission thresholds for construction. Because this would almost certainly be the case for the majority of analyzed criteria pollutants and precursors (PM10, PM2.5, nitrogen oxides [NOx], sulfur oxides [SOx], CO, and volatile organic compounds [VOCs]), the related projects would result in a significant cumulative air quality impact for PM10, PM2.5, NOx, SOx, CO, and VOCs.

Contribution of the Proposed Project (Prior to Mitigation)

The calculated construction emissions associated with the Proposed Project reflect compliance with SCAQMD Rules 403 and 1113, as described in Section 3.1.4, *Impacts and Mitigation Measures*. The maximum daily emissions of criteria air pollutants from construction of the Proposed Project would not exceed SCAQMD significance thresholds (Table 3.1-5). As a result, Proposed Project construction emissions would not make a cumulatively considerable contribution to a significant cumulative impact.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would have no construction activities and would therefore not make a cumulatively considerable contribution to a significant cumulative impact related to construction emissions.

Emissions from construction of the Reduced Project Alternative (Alternative 2) would be slightly less than the Proposed Project and therefore would not exceed the SCAQMD significance thresholds for any criteria pollutants. As a result, construction emissions of the Reduced Project Alternative (Alternative 2) would not make a cumulatively considerable contribution to a significant cumulative impact.

Mitigation Measures and Residual Cumulative Impacts

Because the Proposed Project's construction emissions would not exceed SCAQMD significance thresholds, no mitigation is required, and construction of the Proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact. As with the Proposed Project, construction emissions from the alternatives would not exceed SCAQMD significance thresholds, no mitigation is required, and the alternatives would not make a cumulatively considerable contribution to a significant cumulative impact.

Cumulative Impact AQ-2: Would construction of the Proposed Project or alternatives result in off-site ambient air pollutant concentrations that would make a cumulatively considerable contribution to a significant cumulative impact from exceedance of the SCAQMD thresholds of significance?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

As described in Cumulative Impact AQ-1, above, several large or moderate-sized construction projects (Table 4-1) and several small projects in the Port and surrounding areas could occur concurrently with construction of the Proposed Project. The construction impacts of these related projects would be cumulatively significant if their combined construction ambient pollutant concentrations would exceed the ambient concentration thresholds for construction. Although there is no way to be certain if a cumulative exceedance of the thresholds would happen for any pollutant without performing dispersion modeling of the related projects, cumulative air quality impacts are likely to be significant for ozone (considers NOx and VOCs as an ozone precursors), PM10, and PM2.5, as the South Coast Air Basin is a nonattainment area for these pollutants. Cumulative impacts are unlikely to exceed the thresholds for CO and sulfur dioxide (SO_2) because the entire SCAB is in attainment for CO and SO_2, and Project-level modelling evaluations for other large Port projects have calculated levels well below the CO and SO_2 threshold. Consequently, construction of the related projects is assumed to result in a significant cumulative air quality impact for ozone, PM10, and PM2.5.

Contribution of the Proposed Project (Prior to Mitigation)

Construction of the Proposed Project would not result in emissions that would exceed SCAQMD localized significance thresholds (LSTs) (Table 3.1-6). Per SCAQMD policy, a project's contribution is considered cumulatively considerable if the project's impacts exceed SCAQMD project-specific significance thresholds (SCAQMD, 2003). As a result,

impacts from Proposed Project construction would not make a cumulatively considerable contribution to an existing significant cumulative impact related to off-site ambient concentrations.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would have no construction activities and would therefore not make a considerable contribution to an existing significant cumulative impact.

Construction of the Reduced Project Alternative (Alternative 2) would produce emissions similar to or slightly less than the Proposed Project and would therefore not result in emissions of any criteria pollutant that would exceed SCAQMD thresholds. Accordingly, impacts from construction of the Reduced Project Alternative (Alternative 2) would not make a cumulatively considerable contribution to an existing significant cumulative impact related to off-site ambient concentrations.

Mitigation Measures and Residual Cumulative Impacts

Because the Proposed Project and alternatives would not contribute to significant cumulative impacts related to off-site concentrations, no mitigation is required. Therefore, the Proposed Project and alternatives would not make a cumulatively considerable residual contribution to a significant cumulative impact.

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

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Operation of most of the past, present, and reasonably foreseeable projects in Table 4-1 would contribute to cumulatively considerable impacts by emitting criteria pollutants. The operational impacts of related projects would be cumulatively significant if their operational emissions would exceed the SCAQMD daily emission thresholds for operations. Because this almost certainly would be the case for most or all analyzed criteria pollutants and precursors, the related projects are assumed to result in a significant cumulative air quality criteria pollutant impact.

Contribution of the Proposed Project (Prior to Mitigation)

Proposed Project operational activities would exceed the numerical SCAQMD significance thresholds for emissions of nitrogen oxides (NOx) (Table 3.1-7) and therefore would have a significant impact on regional air quality. As discussed above, per SCAQMD policy, a project's contribution is considered cumulatively considerable if the project's impacts exceed SCAQMD project-specific significance threshold (SCAQMD, 2003). As a result, impacts from Proposed Project operation would be cumulatively considerable prior to implementation of mitigation.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would not result in operational emissions. Accordingly, the No Project Alternative (Alternative 1) would not make a cumulatively considerable contribution to an existing significant cumulative air quality impact.

The Reduced Project Alternative (Alternative 2) would operate about half the area of the Proposed Project and therefore would produce about half the operational emissions in comparison to the Proposed Project. ~~Therefore, the Reduced Project Alternative (Alternative 2) would not exceed numerical SCAQMD significance thresholds for emissions of any criteria pollutants~~At this level, the operational activities of the Reduced Project Alternative (Alternative 2) would exceed the SCAQMD significance thresholds for emissions of NOx in all operational years and therefore would have a significant impact on regional air quality. Accordingly, impacts from operation of the Reduced Project Alternative (Alternative 2) would ~~not make a~~ be cumulatively considerable ~~contribution to an existing significant cumulative impact related to operational emissions.~~ prior to mitigation.

Mitigation Measures and Residual Cumulative Impacts

Implementation of mitigation measure (MM) AQ-1 (*Zero-Emission Cargo-Handling Equipment*) and project feature (PF) AQ-1 *(Zero-Emission Operational Equipmen*t) would lower operational NOx emissions. Nonetheless, even with these measures, the Proposed Project and Reduced Project Alternative (Alternative 2) would make a cumulatively considerable contribution due to the limited feasibility of zero-emission cargo-handling equipment at ~~p~~Project start. The residual cumulative impact would be significant and unavoidable.

As previously stated, the ~~alternatives~~ No Project Alternative (Alternative 1) would not exceed the SCAQMD thresholds for emissions of any criteria pollutants and therefore would not result in cumulatively considerable impacts.

Cumulative Impact AQ-4: Would operation of the Proposed Project or alternatives make a cumulatively considerable contribution to a significant cumulative impact related to off-site ambient air pollutant concentrations exceeding the SCAQMD thresholds of significance?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Operation of most of the related projects in Table 4-1 would contribute to cumulatively considerable impacts. The operations impacts of related projects would be cumulatively significant if their combined operations ambient pollutant concentrations would exceed the ambient concentration thresholds for operations. Although there is no way to be certain if a cumulative exceedance of the thresholds would happen for any pollutant without performing dispersion modeling for each of other projects, cumulative air quality impacts are likely to be significant for ozone (considers NO_X and VOCs as ozone precursors), PM10, and PM2.5, as the South Coast Air Basin is a nonattainment area for these pollutants. Consequently, operation of the related projects is assumed to result in a significant cumulative air quality impact for ozone, PM10, and PM2.5. As explained under Cumulative Impact AQ-2, cumulative impacts are unlikely to exceed the thresholds for CO and SO_2.

Contribution of the Proposed Project (Prior to Mitigation)

Operation of the Proposed Project would not produce maximum emissions that would exceed the SCAQMD's numerical LSTs for any criteria pollutants (Table 3.1-8). As discussed above, per SCAQMD policy, a project's contribution is considered cumulatively considerable if the project's impacts exceed SCAQMD project-specific significance threshold (SCAQMD, 2003). As a result, impacts from Proposed Project operation would not make a cumulatively considerable contribution to an existing significant cumulative impact related to off-site ambient air pollutant concentrations.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would not result in operational emissions. Accordingly, the No Project Alternative (Alternative 1) would not make a cumulatively considerable contribution to an existing significant cumulative air quality impact.

The off-site ambient air pollutant concentrations associated with operation of the Reduced Project Alternative (Alternative 2) would be similar to or slightly less than the Proposed Project and would therefore not exceed SCAQMD's numerical LSTs for any criteria pollutants. Accordingly, impacts from operation of the Reduced Project Alternative (Alternative 2) would not make a cumulatively considerable contribution to an existing significant cumulative impact related to off-site ambient air pollutant concentrations.

Mitigation Measures and Residual Cumulative Impacts

Because the Proposed Project and alternatives would not contribute to significant cumulative impacts related to off-site ambient air pollutant concentrations during operations, no mitigation is required. Therefore, the Proposed Project and alternatives would not make a cumulatively considerable residual contribution to a significant cumulative impact.

Cumulative Impact AQ-5: Would the Proposed Project or alternatives make a cumulatively considerable contribution to a significant cumulative impact from exposure of receptors to significant levels of TACs?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Although the SCAQMD MATES studies have documented substantial decreases in cancer risk to port-area populations over the past 20 years, health risk from air toxins in the port area remains elevated above the risks in communities elsewhere in the SCAB. In addition, the California Air Resources Board (CARB) *Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach* estimated that there are elevated levels of cancer risks due to operational emissions from sources within and near the Ports (CARB, 2006). Based on this information, cancer risk from toxic air contaminant (TAC) emissions within the Project region, including the past, present, and reasonably foreseeable future projects and the Proposed Project, is considered a significant cumulative impact. Non-cancer impacts associated with past, present, and reasonably foreseeable projects in the Proposed Project area are also assumed to have significant cumulative impacts.

As described in Section 3.1.1.3, the San Pedro Bay Ports have approved port-wide air pollution control measures through the San Pedro Bay Ports Clean Air Action Plan (CAAP). Implementation of those measures would reduce the health risk impacts from

the Proposed Project and future projects at the ports. Existing regulations and future rules proposed by the CARB and the U.S. Environmental Protection Agency (see Section 3.1.3, *Applicable Regulations*) would also further reduce air emissions and associated cumulative health impacts from Port operations. However, because future proposed measures (other than CAAP measures) and rules have not been adopted, they have not been accounted for in the emission calculations or health risk assessment for the Proposed Project. Therefore, it is unknown at this time how those future measures would reduce cumulative health risk impacts within the Project area; accordingly, airborne cancer and non-cancer impacts within the Project region are considered to be cumulatively significant.

Contribution of the Proposed Project (Prior to Mitigation)

Based on an assessment of health risks from the maximum anticipated rate of on-site DPM emissions, the Proposed Project construction and operation activities would not expose sensitive receptors to substantial TAC concentrations. As a result, impacts from the Proposed Project would not make a cumulatively considerable contribution to an existing significant cumulative impact related to the exposure of receptors to significant levels of TACs.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would not result in emissions of TACs. Accordingly, the No Project Alternative (Alternative 1) would not make a cumulatively considerable contribution to an existing significant cumulative air quality impact.

Impacts from emissions of TACs from the Reduced Project Alternative (Alternative 2) would be similar to or slightly less than those of the Proposed Project. Accordingly, the Reduced Project Alternative (Alternative 2) would not make a cumulatively considerable contribution to an existing significant cumulative impact related to the exposure of receptors to significant levels of TACs.

Mitigation Measures and Residual Cumulative Impacts

Because the Proposed Project and alternatives would not make a cumulatively considerable contribution to significant cumulative impacts related to the exposure of receptors to significant levels of TACs, no mitigation is required. Therefore, the Proposed Project and alternatives would not make a cumulatively considerable residual contribution to a significant cumulative impact.

Cumulative Impact AQ-6: Would the Proposed Project or alternatives conflict with or obstruct implementation of an applicable air quality plan?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Related projects at the Port and surrounding areas (Table 4-1) would have significant cumulative impacts if they result in population growth or operational emissions that exceed the assumptions in the 2022 Air Quality Management Plan (AQMP) (SCAQMD, 2022). The related projects would be subject to regional planning efforts and applicable land use plans (such as the General Plan or Community Plan) or transportation plans such as the Regional Transportation Plan and the Regional Transportation Improvement Program. Since the 2022 AQMP accounts for population projections that were developed

by SCAG and accounts for planned land use and transportation infrastructure growth, the related projects would be consistent with the AQMP. Therefore, the related projects would not result in significant cumulative impacts related to an obstruction of the AQMP.

Related projects would also have significant cumulative impacts if they conflict with the Wilmington, Carson, West Long Beach Community Emissions Reduction Plan (CERP) and the CAAP. The CERP and CAAP would guide future activities at the Port to reduce air pollution in the Wilmington, Carson, and West Long Beach and Port Complex areas, which are disproportionately burdened with existing cumulative air pollution exposure. Foreseeable future projects in this analysis are anticipated to undergo independent environmental review pursuant to CEQA and/or the National Environmental Policy Act (NEPA) and would include consistency analyses with the CERP, CAAP, or other applicable air quality plans. Therefore, impacts relating to conflicting or obstructing implementation of an applicable air quality plan would not be cumulatively significant.

Contribution of the Proposed Project (Prior to Mitigation)

As discussed in Section 3.1.5.1, *Proposed Project*, the Proposed Project would be consistent with the AQMP, CERP, and the CAAP and therefore, would not conflict with or obstruct implementation of an applicable air quality plan. As a result, the Proposed Project would not make a cumulatively considerable contribution to a cumulative impact in terms of conflicting with or obstructing implementation of an applicable AQMP.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would not result in additional emissions that would conflict with the AQMP, CERP, or the CAAP.

The Reduced Project Alternative (Alternative 2) would have generally similar emissions as the Proposed Project and, for the reasons described above for the Proposed Project, would not make a cumulatively considerable contribution to a cumulative impact in terms of conflicting with or obstructing implementation of an applicable air quality plan.

Mitigation Measures and Residual Cumulative Impacts

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

4.2.2. Energy

4.2.2.1. Scope of Analysis

The scope of the analysis of cumulative effects related to energy conservation includes the overall Port Complex and the immediate surrounding region. The analysis recognizes that energy is required for virtually every activity undertaken by citizens and businesses every day, including domestic uses, transportation, manufacturing, construction, and goods movement and distribution. Energy is supplied by a variety of sources, but fossil fuels are currently the major source. Given the finite nature of fossil fuel supplies and the need to reduce fossil fuel use due to their documented relationship to climate change, the efficiency of energy use and the extent to which energy can be conserved are important issues. The significance criteria used for the cumulative analysis are the same as those used for analysis in Section 3.2.4.3, *Thresholds of Significance*.

4.2.2.2. Existing Cumulative Condition

As discussed in Section 3.2.2, *Environmental Setting*, the Los Angeles Department of Water and Power (LADWP) provides electrical services to the Proposed Project and has adequate generation capacity to serve the Port's current load requirements. Currently, renewable energy sources account for approximately one-third of LADWP's capacity (Table 3.2-1). This is expected to increase over time based on Senate Bill (SB) 100 which established that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by 2045 through the Renewables Portfolio Standards (RPS).

4.2.2.3. Cumulative Impact Analysis

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

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

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

As described above, adequate energy supplies exist to meet the demands of the related projects. Furthermore, the high cost of energy represents an incentive for construction and operational activities to use energy as efficiently as is consistent with Project goals and fiscal responsibility. Therefore, past, present, and reasonably foreseeable future projects would not result in a cumulatively significant impact related to energy use and conservation.

Contribution of the Proposed Project (Prior to Mitigation)

As described in Section 3.2.5.1, *Proposed Project*, construction of the Proposed Project would not result in unnecessary use of energy because construction is necessary to install the facility. Because construction would be consistent with the policies in the Port of Los Angeles' Sustainable Construction Guidelines, which include provisions to reduce energy consumption, such as limiting idling and other measures, it would not result in wasteful consumption of energy.

Operation of the Proposed Project would require use of fossil fuels for motor vehicle trips, but as described in Section 3.2.5.1, *Proposed Project*, overall use of energy for operation-phase truck trips would not substantially change because these trips are not new truck trips generated to/from the Port Complex. Forklifts and UTRs would be electrically powered, which would reduce the use of fossil fuels. Accordingly, no notable change in long-term consumption of non-renewable energy resources would occur with implementation of the Proposed Project and the consumption of energy resources during operation would not be wasteful, inefficient, or unnecessary.

Because construction and operation of the Proposed Project would represent an efficient use of energy, the Proposed Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to energy demand or the efficient use of energy resources under CEQA.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would not involve construction, and operational activities would be the same as baseline activities. Accordingly, energy consumption would not increase above baseline conditions. Therefore, the No Project Alternative (Alternative 1) would not make a cumulatively considerable contribution to a significant cumulative impact related to energy conservation.

The Reduced Project Alternative (Alternative 2) would involve similar construction and operational activities as the Proposed Project. Accordingly, this alternative would not make a cumulatively considerable contribution to a significant cumulative impact related to energy conservation.

Mitigation Measures and Residual Cumulative Impacts

Although no mitigation is required, MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) and PF AQ-1 (*Zero-Emission Operational Equipment*) would improve energy efficiency. The Proposed Project and alternatives would not make a cumulatively considerable contribution to a significant cumulative impact.

4.2.3. Greenhouse Gas Emissions

4.2.3.1. Scope of Analysis

Scientific evidence indicates a trend of warming global surface temperatures over the past century due largely to the generation of GHGs from anthropogenic sources, as further discussed in Section 3.3, *Greenhouse Gas Emissions*. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth.

4.2.3.2. Existing Cumulative Condition

As discussed in Section 3.3.2, *Environmental Setting*, changing temperatures, precipitation, sea levels, ocean currents, wind patterns, and storm activity provide indicators and evidence of the effects of climate change. From 1950 onward, relatively comprehensive data sets of observations are available. Research by California's Office of Environmental Health Hazard Assessment (OEHHA) documents climate change indicators by categorizing the effects as: changes in California's climate; impacts to physical systems including oceans, lakes, rivers, and snowpack; and impacts to biological systems including humans, vegetation, and wildlife. The primary observed changes in California's climate include increased annual average air temperatures, more-frequent extremely hot days and nights, and increased severity of drought. Impacts to physical systems affected by warming temperatures and changing precipitation patterns show decreasing snowmelt runoff, shrinking glaciers, and rising sea levels. Impacts to terrestrial, marine, and freshwater

biological systems, with resulting changes in habitat, agriculture, and food supply are occurring in conjunction with the potential to impact human well-being (OEHHA, 2018).

California first formalized a strategy to achieve GHG reductions in 2008, when California produced approximately 484 million metric tons of CO_2 equivalent ($MMTCO_2e$) according to the official CARB inventory (CARB, 2023). The State's economy-wide emissions have been declining in recent years. California's sources of GHG emitted approximately 381 MMTCO2e in 2021 (CARB, 2023), less than ten percent of the U.S. GHG emissions total for 2019 of 6,577 MMTCO2e.

4.2.3.3. Cumulative Impact Analysis

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

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past, present, and reasonably foreseeable future projects in the area (Table 4-1) have generated and will continue to generate GHGs from the combustion of fossil fuels and the use of coatings, solvents, refrigerants, and other products. Current and future projects will incorporate a variety of GHG reduction measures in response to federal, state, and local mandates and initiatives, and these measures are expected to reduce GHG emissions from future projects. However, because of the long-lived nature of GHGs in the atmosphere and the global nature of GHG emissions impacts, no specific quantitative thresholds of significance under CEQA for GHG emissions from related projects in the region or statewide have been identified. It is therefore conservatively assumed that any GHG emissions related to past, present, and reasonably foreseeable future projects represent a significant cumulative impact.

Contribution of the Proposed Project (Prior to Mitigation)

The challenge in assessing the significance of an individual project's contribution to global GHG emissions and associated global climate change impacts is to determine whether a project's GHG emissions, which are at a micro-scale relative to global emissions, make a cumulatively considerable incremental contribution to a macro-scale impact. SCAQMD developed a project-level significance threshold for GHGs. For the purposes of this cumulative discussion, it is conservatively assumed that an exceedance of the project-level threshold would result in a cumulatively considerable contribution to the overall GHG burden. GHG emissions associated with the Proposed Project would ~~be below~~ exceed ~~SCAQMD's~~ LAHD's threshold for GHG emissions for both the opening year (~~2027~~2029) and buildout year (~~2046~~2049) (Table 3.3-2), and mitigation would reduce this impact to less than significant. ~~Because~~ After full implementation of Project-specific mitigation (MM GHG-1), construction and operational activities would not generate GHG emissions that may have a significant impact on the environment. As mitigated, the Proposed Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to GHG emissions.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would not result in an increase in GHG emissions and would therefore not make a cumulatively considerable contribution to a significant cumulative impact.

The Reduced Project Alternative (Alternative 2) would produce less GHG emissions as only half the site would be operating compared to the Proposed Project. Assuming a proportional reduction in GHG emissions, the Reduced Project Alternative (Alternative 2) would not exceed the SCAQMD GHG significance thresholds. Accordingly, impacts of the Reduced Project Alternative (Alternative 2) would not make a cumulatively considerable contribution to an existing significant cumulative impact related to GHG emissions.

Mitigation Measures and Residual Cumulative Impacts

~~No~~ Project-specific mitigation is required~~; however,~~ to ~~reduce~~ offset the GHG emissions of the Proposed Project. MM GHG-1 (*GHG Reduction Offsets*) would require carbon offsets to be purchased and retired~~sponsor activities to reduce, avoid, destroy, or sequester GHG emissions~~. Additionally, for avoiding air pollutant emissions, implementation of PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emissions Cargo-Handling Equipment*) would further reduce operational GHG emissions through the transition of all yard equipment and cargo-handling equipment to zero-emission equipment. As such, the Proposed Project would not make a cumulatively considerable residual contribution to significant cumulative impacts related to operational GHG emissions. As previously stated, the alternatives would not exceed ~~the SCAQMD~~ LAHD's threshold~~s~~ for GHG emissions and therefore would not result in cumulatively considerable impacts.

Cumulative Impact GHG-2: Would the Proposed Project or alternatives conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, that would make a cumulatively considerable contribution to a significant cumulative impact?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Related projects would have significant cumulative impacts if they would result in a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Foreseeable future projects in this analysis are anticipated to undergo independent environmental review pursuant to CEQA and/or NEPA and would include consistency analyses with all applicable plans. Therefore, impacts relating to conflicting or obstructing implementation of an applicable GHG emissions reduction plan would not be cumulatively significant.

Contribution of the Proposed Project (Prior to Mitigation)

Through the Climate Change Scoping Plan and CARB Cap-and-Trade and Low Carbon Fuel Standard regulations, Proposed Project activities would either be exempt from or would be required to comply with CARB rules and regulations as well as all other local plans and strategies to reduce GHG emissions (Table 3.3-3). As such, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the

purpose of reducing GHG emissions and would not result in a cumulatively considerable contribution to a significant cumulative impact related to applicable plans, policies, or regulations.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would not result in an increase in GHG emissions and associated potential to conflict with an applicable plan, policy, or regulation adopted for reducing GHG emissions. Therefore, the No Project Alternative (Alternative 1) would not make a cumulatively considerable contribution to a significant cumulative impact.

As with the Proposed Project, the Reduced Project Alternative (Alternative 2) would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Accordingly, impacts of the Reduced Project Alternative (Alternative 2) would not make a cumulatively considerable contribution to an existing significant cumulative impact related to applicable plans, policies, or regulations.

Mitigation Measures and Residual Cumulative Impacts

Because the Proposed Project and alternatives would not result in a cumulatively considerable contribution to significant cumulative impacts related to applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions, no mitigation is required. Therefore, the Proposed Project and alternatives would not make a cumulatively considerable residual contribution to a significant cumulative impact.

4.2.4. Hazards and Hazardous Materials

4.2.4.1. Scope of Analysis

The geographic extent for the analysis of cumulative impacts related to hazardous materials is limited to the Project site and the immediate vicinity surrounding the Project site, which includes the adjacent harbor waters and land areas, and roadways adjacent to and in the vicinity of the proposed Project. These geographic limits are appropriate to consider the potential cumulative impacts, as the current and past land uses on the Project site and those in the immediate vicinity of the Project site are the most important factors in evaluating the potential for environmental contamination to occur or have occurred at the Project site. Impacts would have the potential to occur during construction and would be limited to the areas where and times when concurrent construction is occurring.

4.2.4.2. Existing Cumulative Condition

As discussed in Section 3.4.2, *Environmental Setting*, hazardous materials would be encountered in soil or groundwater at the Project site during construction ground disturbing activities and construction would involve transport, handling, storage, and disposal of soil and/or groundwater contaminated with hazardous materials. Additionally, several known hazardous material sites are located nearby and adjacent to the Project site, but most are sites that generate, use, store, and/or transport hazardous materials that are not of environmental concern to the Project site due to status, types and volumes of hazardous materials, and location (~~see Appendix C~~EDR, 2024a). Construction activities associated with the Project and other current and reasonably foreseeable projects, either

individually or collectively, could result in hazardous materials being encountered in soils or groundwater. Hazardous materials are potentially located in soil or groundwater in areas adjacent to the Project site and throughout POLA. However, the Project would comply with all applicable standards, regulations, and requirements to reduce potential impacts from hazardous materials. It is anticipated that the listed current and reasonably foreseeable projects would be implemented in a similar manner.

4.2.4.3. Cumulative Impact Analysis

Cumulative Impact HAZ-1: Would the Proposed Project or alternatives be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment, that would make a cumulatively considerable contribution to a significant cumulative impact?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Table 4-1 provides a listing of current and reasonably foreseeable projects, including other proposed or approved projects in the geographic area, such as POLA or POLB authorized actions or activities, proposed or approved projects within areas under the jurisdiction of the POLB, POLA, County of Los Angeles or surrounding cities, and other actions or activities that the POLA consider reasonably foreseeable. Most of these projects have either undergone independent environmental review pursuant to CEQA and/or NEPA or will do so prior to approval. Even if environmental review has not been completed for the projects described in Table 4-1, their effects were considered in the cumulative impacts analyses in this EIR, as appropriate. Foreseeable future projects identified for this analysis include POLA and POLB pier facility improvement, expansion, modification, and development projects, decommissioning projects, channel deepening projects, road and bridge replacement projects, transmission tower replacement projects, and mixed-use development projects. The list was reviewed to identify cumulative projects that are planned in the hazards and hazardous materials geographic extent. Review of Table 4-1 identified no projects with cumulatively considerable impacts.

Contribution of the Proposed Project (Prior to Mitigation)

Given that there is known contaminated soil and groundwater on the Project site, LAHD ~~would~~ has prepared a ~~s~~Soil ~~m~~Management ~~p~~Plan for the Project site in accordance with applicable regulatory requirements, which would direct the management of the specific contaminated media that could reasonably be expected to be encountered at the Project site. The plan ~~would~~ identifies~~y~~ known site contaminants, specifies~~y~~ protocols for handling and managing contaminated media, including necessary personnel training, the use of appropriate personal protective equipment for construction personnel, stockpiling and testing of excavated soils for off-site disposal at an appropriate licensed waste disposal facility, or reuse onsite if deemed suitable for industrial land use.~~, and appropriate containment and disposal at appropriate licensed waste disposal facilities.~~ Implementation of the ~~s~~Soil ~~m~~Management ~~p~~Plan would be a permit condition. Furthermore, LAHD would comply with National Pollutant Discharge Elimination System groundwater discharge requirements.

However, the Project site is located within a City-defined methane and methane buffer zone, and soil vapors are known to be present on site. Ground-disturbing activities have the potential to expose workers to elevated levels of methane gas, and soil vapor may expose construction workers and on-site staff in buildings and enclosed structures during operations.

Therefore, the potential for encountering contaminated soil, groundwater, or methane gas conditions during construction and operation of the Proposed Project remains. As such, impacts related to the Project site being located on or near a hazardous material site would be significant. However, the individual, isolated contribution of the Proposed Project's impact, while significant, would not be cumulatively considerable because the cumulative projects do not result in cumulative impacts that could combine with the Proposed Project.

Contribution of the Alternatives

The No Project Alternative (Alternative 1) would not involve any handling or disposal of the existing contaminated soil and groundwater and would therefore not make a cumulatively considerable contribution to a significant cumulative impact related to hazardous materials.

The Reduced Project Alternative (Alternative 2) would have substantially less ground disturbance and therefore would result in less contaminated materials being encountered. Similar to the Proposed Project, a soil management plan would be prepared in compliance with applicable regulatory requirements; any contaminated soil or groundwater would be handled, stored, transported, and disposed of in accordance with the soil management plan. Compliance with the LADBS Methane Mitigation Standards would also be required. NPDES groundwater discharge requirements would also be followed to ensure compliance. However, because the cumulative projects do not result in cumulatively considerable impacts, the individual, isolated contribution of the Reduced Project Alternative's (Alternative 2) impact, while locally significant, would not contribute to a significant cumulative impact.

Mitigation Measures and Residual Cumulative Impacts

With implementation of MM HAZ-1 (*Characterize Soil, Soil Vapor, and Groundwater Contamination*), impacts of the Proposed Project and Reduced Project Alternative (Alternative 2) would be reduced and would not make a cumulatively considerable contribution to a significant cumulative impact.

The No Project Alternative (Alternative 1) would not create a significant hazard, no mitigation is required and thus would not make a cumulatively considerable contribution to a significant cumulative impact.

4.3 Summary of Cumulatively Considerable Impacts

The following sections provide a summary of the resource area in which the Proposed Project and alternatives would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact after mitigation and are based on the discussion in Section 4.2, *Cumulative Impact Analysis*. Table 4-2 summarizes residual

impacts and the cumulative analysis for the Proposed Project and alternatives. Because the No Project Alternative (Alternative 1) would make no cumulatively considerable contributions to significant cumulative impacts to any resource area, as discussed in Section 4.2, *Cumulative Impact Analysis*, this alternative is not included in Table 4-2.

4.3.1. Proposed Project

The Proposed Project would make cumulatively considerable and unavoidable contributions to significant cumulative impacts after mitigation (when applicable) in the following resource area~~s~~:

- Air Quality;
    - Emissions from operations would make a cumulatively considerable and unavoidable residual contribution to a significant cumulative impact related to operational NOx emissions.

4.3.2. Alternative 1 – No Project Alternative

Because site conditions would remain unchanged and there would be no construction or new operations at the site, the No Project Alternative (Alternative 1) would make no cumulatively considerable and unavoidable contributions to significant cumulative impacts to any resource area.

4.3.3. Alternative 2 – Reduced Project Alternative

The Reduced Project Alternative (Alternative 2) would result in construction and operation of about half the area of the Proposed Project and would produce half the emissions compared to the Proposed Project. ~~Therefore, the Reduced Project Alternative (Alternative 2) would make no cumulatively considerable and unavoidable contributions to significant cumulative impacts to any resource area.~~ However, the Reduced Project Alternative (Alternative 2) would result in cumulatively considerable and unavoidable contributions to significant cumulative impacts after mitigation (when applicable) in the following resource area:

- Air Quality;
    - Emissions from operations would make a cumulatively considerable and unavoidable residual contribution to a significant cumulative impact related to operational NOx emissions.

Table 4-2: Summary Matrix of Residual Impacts, Cumulative Analysis, and Mitigation Measures for the Proposed Project and Alternatives~~s~~ 2

Resource Area	Environmental Impacts	Proposed Project Residual Impacts	Applied Project Features/Mitigation Measures	Cumulative Analysis for Proposed Project	Cumulative Analysis for Alternative 2
Air Quality	AQ-1: Result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions	Less Than Significant	Mitigation Not Required	No cumulatively considerable contribution to an existing significant cumulative impact	Same as the Proposed Project
	AQ-2: Result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance	Less Than Significant	Mitigation Not Required	No cumulatively considerable contribution to an existing significant cumulative impact	Same as the Proposed Project
	AQ-3: Result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance	NOx emissions would be significant during operations	**PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	Cumulatively considerable contribution to an existing significant cumulative impact related to NOx emissions during operations	Significant NOx emissions during operations resulting in a cumulatively considerable contribution to an existing significant cumulative impact ~~Less than the Proposed Project without the need for mitigation~~ **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment
	AQ-4: Result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance	Less Than Significant	Mitigation Not Required	No cumulatively considerable contribution to an existing significant cumulative impact	Same as the Proposed Project
	AQ-5: Expose receptors to significant levels of TACs	Less Than Significant	Mitigation Not Required	No cumulatively considerable contribution to an existing significant cumulative impact	Same as the Proposed Project
	AQ-6: Conflict with or obstruct implementation of an applicable air quality plan	Less Than Significant	Mitigation Not Required	No cumulatively considerable contribution to an existing significant cumulative impact	Same as the Proposed Project

Resource Area	Environmental Impacts	Proposed Project Residual Impacts	Applied Project Features/Mitigation Measures	Cumulative Analysis for Proposed Project	Cumulative Analysis for Alternative 2
Energy	EN-1: Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	Less Than Significant	Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	No cumulatively considerable contribution to an existing significant cumulative impact	Same as the Proposed Project Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment
Greenhouse Gas Emissions	GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	~~Less Than~~ Significant	~~Mitigation Not Required~~ **MM GHG-1:** GHG Reduction Offsets **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment	No cumulatively considerable contribution to an existing significant cumulative impact with implementation of MM GHG-1	No cumulatively considerable contribution to an existing significant cumulative impact Mitigation Not Required **PF AQ-1:** Zero-Emission Operational Equipment **MM AQ-1:** Zero-Emission Cargo-Handling Equipment
	GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	Less Than Significant	Mitigation Not Required	No cumulatively considerable contribution to an existing significant cumulative impact	Same as the Proposed Project
Hazards and Hazardous Materials	HAZ-1: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment	Significant impact from exposure to contaminated soil, groundwater, or methane gas.	**MM HAZ-1:** Characterize Soil, Soil Vapor, and Groundwater Contamination	No cumulatively considerable contribution to an existing significant cumulative impact	Same as the Proposed Project **MM HAZ-1:** Characterize Soil, Soil Vapor, and Groundwater Contamination

1 1 - No Project Alternative (Alternative 1) would make no cumulatively considerable and unavoidable contributions to significant cumulative impacts to any resource area.

Chapter 5
Comparison of Alternatives

5.1 Introduction

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) present a reasonable range of feasible alternatives to a proposed project. Section 15126.6(a) of the State CEQA Guidelines requires that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." This chapter presents a comparison of the Proposed Project to the alternatives considered (Section 5.2) which meet the initial screening criteria set forth in State CEQA Guidelines Section 15126.6(c) (Section 5.3).

As the alternatives are intended to avoid or substantially lessen one or more of the significant adverse effects of the Proposed Project, this chapter focuses on the comparative merits of the alternatives with respect to those environmental resource areas which may be significantly impacted by the Proposed Project. As such, this comparison is based on the environmental resources analyzed in Chapter 3 of this EIR.

The alternatives in this EIR have been analyzed in Chapter 3 at a level that provides sufficient information about the environmental effects of each alternative for comparative purposes and to allow for informed decision-making. Several other alternatives were considered, but because they were rejected from further consideration (Section 5.2.3) they are not included in the comparison of alternatives.

5.2 Project Alternatives

Section 2.3, *Project Objectives*, forms the basis for developing alternatives to the Proposed Project. The Proposed Project's objectives include issuing a Term Permit (or Permits) for the operations of a chassis support facility for up to 25 years; optimizing the use of existing land to support chassis storage; reducing inefficient chassis trips; providing a full-service depot increasing efficiency of terminal operations; and advancing the Port's zero emissions cargo-handling equipment goals by January 1, 2030.

The alternatives to the Proposed Project are:

- Alternative 1 – No Project; and
- Alternative 2 – Reduced Project.

Table 5-1 presents the main components of each alternative and how they differ from those of the Proposed Project.

Table 5-1: Summary of Proposed Project and Alternatives at Full Buildout (Year ~~2046~~2049)

Activity	Alternative		
	Proposed Project	Alt 1: No Project	Alt 2: Reduced Project [1]
Construction workers	60	0	30[2]
Operational employees	105	0	53
Total truck trips, one-way trips/day	6,838	0[3]	3,419
Project Site (Acres) ~~Utilized~~	89.2	0	~~52.7~~ 51.7
Container stalls	3,600	0	1,800
High mast light poles	40	0	20
Re-grading export volume (CY)	270,000	0	135,000[4]

1- Values were extrapolated based on the reduced Project footprint (acres utilized).
2- Exact number of construction workers may vary depending on construction schedule of the Reduced Project Alternative (Alternative 2).
3- Under the No Project Alternative (Alternative 1), the number of truck trips is treated the same as the CEQA baseline and is therefore zero.
4- Exact re-grading export volume may vary depending on distribution of cut across the site under the Reduced Project Alternative (Alternative 2).

5.2.1. Alternative 1 – No Project Alternative

The No Project Alternative (Alternative 1), which is required under State CEQA Guidelines Section 15126.6(e) represents what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved. Under this alternative, the Project site would remain unused for the foreseeable future. Conditions under this alternative would remain the same as baseline conditions, as no construction or operational activities would occur. No other proposed development at the site has been permitted or approved. The No Project Alternative (Alternative 1) would not meet any of the Project's objectives.

5.2.2. Alternative 2 – Reduced Project Alternative

Under the Reduced Project Alternative (Alternative 2), the Project site area would be reduced by about half, from 89.2 acres to ~~52.7~~ 51.7 acres (~~73~~ 71 acres [usable space]/2 + 16.2 acres other/outside loop). The number of buildings and structures to be constructed and operated at the site would be reduced by half. This alternative would include the same modifications and use of the existing office building at 750 Eldridge Street and construction of the LADWP substation like the Proposed Project. Other construction and operational activities would be similar to the Proposed Project, but with reduced intensity given the smaller area. For example, less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced footprint.

5.2.3. Alternatives Considered But Not Further Evaluated

Two alternatives were considered based on comments received during the public scoping period (December 7, 2023 – January 22, 2024) and in coordination with LAHD but were eliminated from further consideration because they would not meet most of the basic Project objectives, were deemed infeasible, or would be unable to avoid or substantially lessen one or more of the significant environmental impacts of the Proposed Project (State CEQA Guidelines Section 15126.6(c)).

5.2.3.1. Container Storage Alternative

Description of Alternative

Under this alternative, only full cargo containers would be stored at the Project site. Full cargo containers are transported more frequently than empty containers. Additional pieces of equipment would be needed, including more top handlers and utility tractor rigs. No chassis storage, maintenance, or repair activities would occur.

Analysis and Rationale for Elimination

This alternative would partially meet the Project objectives by optimizing the use of existing land, although for a different purpose, and increasing on-terminal efficiency for Port operations by providing a centralized location for storing full cargo containers. However, storage of full cargo containers requires higher-intensity operations compared to the Proposed Project, which would involve chassis storage, maintenance, and repair facilities, and/or wheeled empty containers storage. Full containers experience higher turnover compared to empty containers, which are generally stored for longer periods of time; therefore, truck trips would be more frequent. With more truck trips, there would be more greenhouse gas (GHG) emissions and air quality impacts compared to the Proposed Project. Furthermore, because this alternative would not include any chassis depot operations, it would not reduce inefficient chassis trips, reduce double-handling of empty containers, or provide a full-service depot to increase the efficiency of terminal operations. Therefore, this alternative would not substantially reduce the impacts of the Proposed Project and has been eliminated from further analysis.

5.2.3.2. Half Peel-Off Alternative

Description of Alternative

Under this alternative, half of the Project site would be operated as a chassis depot with ancillary storage of wheeled empty containers, as described for the Proposed Project in the Project Description (Section 2.5.3, *Operations*), and the other half would be operated as a "peel-off" site. Peel-off operations include the storage of full containers and moving stacked full containers in order from top to bottom. This alternative would improve the efficiency of terminal operations by reducing truck waiting and idling times by moving full containers at the top of a stack rather than reaching for specific containers that may be buried at the bottom of a stack. Additional electrical conduit would need to be installed for charging infrastructure to support the increased operational equipment required.

Analysis and Rationale for Elimination

This alternative would partially meet the Project objectives by optimizing the use of existing land, although for a different purpose, and increasing on-terminal efficiency for Port operations by providing a centralized location for chassis storage and peel-off operations. Although this alternative could reduce some air quality and GHG impacts from reduced idling times at the Project site, truck trips would be more frequent due to the increased turnover of full containers for peel-off operations compared to the storage of chassis and wheeled empty containers. The increased number of truck trips would result in overall greater air quality/GHG impacts and energy consumption during operations and would not substantially reduce other impacts of the Proposed Project. Therefore, this alternative has been eliminated from further analysis.

5.3 Alternatives Comparison

5.3.1. CEQA Alternatives Comparison

This section summarizes and compares the environmental issues and impacts of the Proposed Project and alternatives as analyzed in Chapter 3. This section is intended to provide decision-makers with information about the merits and disadvantages of each of the alternatives. This will assist decision-makers as they consider approval or denial of the Proposed Project and to assist the public in understanding the differences between the alternatives.

Table 5-2 presents a summary matrix of the environmental impacts associated with the Proposed Project (as analyzed in Chapter 3) and the alternatives. Impacts are presented in more detail in Table ES-1 and the summary tables in each resource section in Chapter 3.

The matrix provided in Table 5-2 is organized by environmental issue area, for those issue areas analyzed in detail within this EIR (Section 1.5.1, *Scope of Analysis*, for other issue areas identified to not result in significant impacts). Significance conclusions are denoted as “Significant” for significant unavoidable impacts, “LTS” for less-than-significant impacts, and “LTS-M” for less-than-significant impacts with incorporation of mitigation measures.

The No Project Alternative (Alternative 1) would have no significant impacts to any resource areas.

1 **Table 5-2: Summary of Impacts**

Issue Area	Impact Title	Proposed Project	Alternative 1 – No Project	Alternative 2 – Reduced Project
Air Quality and Health Risk	**AQ-1:** Result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions	LTS	No Impact	LTS
	AQ-2: Result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance	LTS	No Impact	LTS
	AQ-3: Result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance	Significant and Unavoidable	No Impact	~~LTS~~Significant and Unavoidable
	AQ-4: Result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance	LTS	No Impact	LTS
	AQ-5: Expose receptors to significant levels of TACs	LTS	No Impact	LTS
	AQ-6: Conflict with or obstruct implementation of an applicable air quality plan	LTS	No Impact	LTS
Energy	**EN-1:** Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	LTS	No Impact	LTS
Greenhouse Gas Emissions	**GHG-1:** Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	LTS-M	No Impact	LTS
	GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	LTS	No Impact	LTS
Hazards and Hazardous Materials	**HAZ-1:** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment	LTS-M	No Impact	LTS-M

5.3.2. Environmentally Superior Alternative

In accordance with CEQA requirements, an "environmentally superior alternative" must be identified among the alternatives analyzed in the EIR. The environmentally superior alternative is the alternative found to have an overall environmental advantage compared to the other alternatives based on the impact analysis in the EIR. Based on the above comparison, the No Project Alternative (Alternative 1) would have no impacts and is deemed to be the environmentally superior alternative. Under CEQA, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from the other alternatives (State CEQA Guidelines Section 15126.6(e)(2)). ~~As such, the environmentally superior alternative would be t~~

As discussed in Section 5.3.1, the Proposed Project would have significant unavoidable operational air quality impacts related to NOx emissions at full buildout (2049) and would result in significant GHG emission impacts without mitigation. The Reduced Project Alternative (Alternative 2)~~. This alternative~~ would result in approximately half the construction emissions, construction workers, operational employees, container stalls, lighting, and exported material due to the reduced footprint compared to the Proposed Project resulting in less than significant GHG emission impacts~~ and~~, although it would not avoid the significant and unavoidable operational air quality impact from NOx emissions ~~during operations~~ at full buildout (~~2046~~2049). Due to these reduced impacts and despite the remaining significant unavoidable impact, the Reduced Project Alternative (Alternative 2) is deemed to be the environmentally superior alternative. However, the Reduced Project Alternative (Alternative 2) does not provide the same amount of operational capacity as the Proposed Project due to the reduced acreage, which would accommodate half the number of chassis and/or wheeled empty containers compared to the Proposed Project. The Reduced Project Alternative (Alternative 2) would ~~satisfy~~ accommodate the Project objectives to a lesser degree, as it would reach capacity faster than the Proposed Project and would have a reduced ability to decrease container dwell time for empty containers at the marine terminal, inefficient chassis trips, double-handling of empty containers, and increase on-terminal efficiency by having sufficient readily available chassis. Improving efficiencies reduces the wasteful use of nonrenewable resources (e.g., fossil fuel), number of truck trips, and GHG emissions; therefore, the greater long-term operational efficiency of the Proposed Project would offset the Project-specific NOx emissions and greater short-term construction impacts making the Proposed Project the "~~e~~Environmentally ~~s~~Superior ~~a~~Alternative."

Chapter 6
Significant Irreversible Changes

6.1 Introduction

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15126.2(d), an Environmental Impact Report (EIR) must consider any significant irreversible environmental changes that would be caused by a proposed project should it be implemented. Section 15126.2(d) states:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts, and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

6.2 Analysis of Irreversible Changes

Resources that are committed irreversibly and irretrievably are those that would be used by a project on a long-term or permanent basis. Construction of the Proposed Project would require the use of non-renewable resources such as fossil fuels and some types of construction materials such as steel and concrete. Fossil fuels and other forms of energy would be consumed during operation of the Proposed Project. Diesel, gasoline, and propane would be used for facility operations for several years and for on-road vehicles (trucks and employee automobiles) until the Project transitions to 100 percent zero-emissions technology by January 1, 2030 as required by the Project Feature AQ-1 (*Zero-Emissions Operational Equipment*). Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. Electric charging infrastructure would be constructed to meet the energy demand of on-site equipment and to meet zero emissions regulations. Additionally, MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would require use of zero-emission cargo-handling equipment at the start of operations and MM GHG-1 (*GHG Reduction Offsets*) would require carbon offsets to be purchased and retired. Electrical energy would be consumed during operation, which may come from both renewable and non-renewable sources. Non-recoverable materials and energy would be used during construction and operation, but the amounts needed would be accommodated by existing supplies. Although the increase in the amounts of materials and nonrenewable energy used would

be limited, they would nevertheless be unavailable for other uses. The minimal irreversible changes likely would be justified by the economic growth in the area, which the Proposed Project would provide. The Proposed Project would also improve time efficiencies and reduce inefficient use of nonrenewable sources at the Port by reducing container dwell time for empty containers at the marine terminal; reducing inefficient chassis trips; providing on-terminal efficiency by providing a centralized location with readily available chassis; providing a full-service depot to improve the efficiency of terminal operations; and providing off-terminal maritime support to increase the efficiency of goods movement in the Port. The irreversible changes associated with the Proposed Project and alternatives are considered justified under CEQA.

Chapter 7
Growth-Inducing Impacts

7.1 Introduction

The State California Environmental Quality Act (CEQA) Guidelines require an Environmental Impact Report (EIR) to discuss the ways in which a project could foster economic or population growth either directly or indirectly, in the surrounding environment. This includes ways in which a proposed project would remove obstacles to population growth or trigger the construction of new community service facilities that could cause significant effects. State CEQA Guidelines Section 15126.2(e) states:

> *Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

The analysis presented below is focused on whether the Proposed Project would directly or indirectly stimulate growth in the surrounding area. Given its nature (i.e., a new chassis support and/or wheeled empty container storage facility), the Proposed Project is expected to accommodate future economic growth by increasing on-terminal efficiency and efficiency of goods movement in the Port.

7.2 Summary of Growth-Inducing Impacts

As discussed further below, the Proposed Project would directly accommodate future economic growth by increasing on-terminal efficiency and efficiency of goods movement in the Port but would not foster population growth in the Port's region of influence (Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County). Although the Proposed Project would improve on-terminal and goods movement efficiency in the Port, this change would not in itself stimulate significant population growth. Further, it would not remove obstacles to population growth, nor would it

necessitate construction of new community facilities that would lead to additional growth in the surrounding area.

7.2.1. Direct Growth-Inducing Impacts

A project would directly induce growth if it would foster economic or population growth or the construction of new housing in the surrounding environment (e.g., if it would remove an obstacle to growth by expanding existing infrastructure).

The Proposed Project is located in an area of the Port that is currently developed with industrial and cargo container operational uses. The Proposed Project would reduce inefficient chassis trips and increase the efficiency of terminal operations by providing storage, maintenance, repair, and start/stop functions of chassis, and/or wheeled empty storage containers. In this way, the Proposed Project would directly accommodate future economic growth of the Port of Los Angeles and Port of Long Beach, the City of Los Angeles, and surrounding areas. However, the growth would not be unexpected or constitute substantial unplanned growth.

The Proposed Project does not include the development of new housing or population-generating uses or infrastructure that would directly encourage such uses. The residential areas in the immediate vicinity of the Proposed Project (San Pedro and Wilmington communities) are largely built out. Any future development on vacant and underdeveloped parcels in those communities would not be attributed to the Proposed Project.

As discussed in the Notice of Preparation/Initial Study (see Final EIR Appendix A), implementation of the Proposed Project would not require or result in the construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Any changes in infrastructure of the region or the state are not considered growth-inducing because they would not be implemented specifically to meet the needs of the Proposed Project but rather as part of the public utility's overall increases in capacity and would not induce new population growth or the construction of new housing.

7.2.2. Indirect Growth-Inducing Impacts

A project would indirectly induce growth if it would foster economic or population-expanding activities, which would lead to further development that taxes existing facilities and eventually requires construction of new facilities (e.g., an increase in population because of development authorized by approval of a general plan).

As discussed in Chapter 2, *Project Description*, the Proposed Project would employ up to 60 workers during construction, ~~and~~ up to 80 workers during 2029 operations, and up to 105 workers under full buildout conditions in 2049. The Project site is within the Port and proximate to a well-established, heavily populated urban community that provides sufficient existing housing stock and established infrastructure. Additionally, there is an adequate supply of workers in the vicinity given the urban setting. The population of the City of Los Angeles is expected to grow by approximately eight percent between 2020 and 2030, and this growth has been planned for in the General Plan Housing Element (City of Los Angeles, 2021). Accordingly, the Proposed Project's contribution would be a negligible percentage of regional employment levels, such that there would be no substantial in-migration of workers to the region. Thus, in the absence of changes in places of residence by persons likely to fill new jobs, distributional effects on population

and housing assets are very unlikely, and the Proposed Project would not have any significant effects on population growth that would tax existing facilities or require the construction of new facilities.

Given its small size relative to the region's overall Port industry, the Proposed Project would not cause a substantial indirect increase in earnings to firms and households throughout the region. The short-term indirect effects from construction would result in a small incremental increase in activity at local retail establishments. However, the long-term effects in the immediate area from the Proposed Project would be small relative to the size of the regional economy. Overall, the Proposed Project would not generate significant indirect growth-inducing impacts.

Chapter 8
List of Preparers and Contributors

Los Angeles Harbor Department

- Lisa Wunder, Director of Environmental Management
- Nicole Enciso, Marine Environmental Supervisor, CEQA
- Uriel de los Reyes, Environmental Specialist, CEQA
- Rita Brenner, Marine Environmental Supervisor, Site Restoration
- Pauling Sun, Environmental Specialist, Site Restoration
- Kat Prickett, Marine Environmental Supervisor, Water
- Andrew Jirik, Environmental Specialist, Water
- Christopher Morton, Civil Engineering Associate, Engineering
- Geraldine Shimabukuro, Senior Civil Engineer, Engineering
- Mark Rose, Assistant Chief Harbor Engineer, Construction
- Lance Graab, Principal Construction Inspector, Construction
- Brian Chuc, Harbor Engineer, Construction
- Kerry Cartwright, Director, Goods Movement
- Shozo Yoshikawa, Transportation Engineer, Goods Movement
- Michael Keenan, Harbor Planning and Research Director, Planning and Strategy
- Derek Jordan, Harbor Planning and Research Assistant Director, Planning and Strategy
- Marisa Katnich, Director, Cargo and Industrial Real Estate
- Traci Kuchta, Property Manager, Cargo and Industrial Real Estate

Aspen Environmental Group

- Lisa Blewitt, Project Manager
- Brewster Birdsall, PE, Air Quality and Health Risk, Energy, GHG
- Rachael Dal Porto, PhD, Air Quality and Health Risk, Energy, GHG
- Aurie Patterson, PG, Hazards and Hazardous Materials (Retired)
- Stephanie Tang, Deputy Project Manager, Cumulative Analysis, Alternatives

- Avery Robinson, Executive Summary, Introduction, Project Description, Cumulative Analysis, Significant Irreversible Changes, Growth-Inducing Impacts

Aspen Team Subcontractors

ENGEO

- Jim Thurber, PG, CHg, CEG, Hazards and Hazardous Materials
- Jennifer Knipper, PG, Hazards and Hazardous Materials

Chapter 9
References

Chapter 1 Introduction

LAHD (Los Angeles Harbor Department). 2022. Facts and Figures. Accessed March 12, 2024. https://www.portoflosangeles.org/business/statistics/facts-and-figures.

Chapter 2 Project Description

City of Los Angeles. 2024. ZIMAS. Accessed March 10, 2024. https://zimas.lacity.org/.

LAHD (Los Angeles Harbor Department). 2017. Environmental Baseline Investigation: Former LAXT Remote Storage Area & Customs Building Property, 300 S. Ferry Street & 750 Eldridge Street, Terminal Island, California 90731. Prepared for City of Los Angeles Harbor Department, Environmental Management Division. APP 050930-549 H. Prepared by Pacific Edge Engineering, Inc. for the City of Los Angeles Harbor Department, Environmental Management Division. APP 050930-549 H. November 3.

_____. 2018. Port Master Plan. September. Accessed March 8, 2024. https://kentico.portoflosangeles.org/getmedia/adf788d8-74e3-4fc3-b774-c6090264f8b9/port-master-plan-updatewith-no-29_9-20-2018.

_____. 2023a. Port of Los Angeles Terrestrial Biological Characterization Survey – LAXT Loop. Prepared by Rincon Consultants, Inc. April. Updated September 2023.

_____. 2023b. Email from Shozo Yoshikawa, P.E., Transportation Engineer, Port of Los Angeles Goods Movement Division to Justin Houterman (Legal). January 13. Subject: LAXT loop trip generation and VMT calcs. Attached spreadsheet: LAXT Loop trip gen vmt import benefit stream calcs 20230112.xlsx

Chapter 3 Environmental Analysis

Section 3.1 Air Quality and Health Risk

CARB (California Air Resources Board). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. Accessed November 5, 2025. https:// www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf.

_____. 2021. Emission Factor (EMFAC) Model. Accessed April 15, 2024. https://arb.ca.gov/emfac/.

_____. 2022. Maps of State and Federal Area Designations. Accessed April 15, 2024. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

City of Los Angeles. 2006. L.A. CEQA Thresholds Guide. Accessed April 17, 2024. https://planning.lacity.gov/eir/CrossroadsHwd/deir/files/references/A07.pdf.

_____. 2019a. Sustainable City pLAn. Accessed April 15, 2024. https://plan.lamayor.org/.

_____. 2019b. Air Quality and Health Effects. Accessed November 5, 2025. https://planning.lacity.gov/odocument/e1a00fbf-6134-4fa9-b6fd-54eee631effb/City_of_LA_-_Air_Quality_and_Health_Effects_and_Attachments.pdf.

_____. 2021. General Plan Air Quality Element. Accessed April 15, 2024. https://planning.lacity.gov/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

LAHD (Los Angeles Harbor Department). 2015. Port of Los Angeles Goods Movement Division, spreadsheet analysis. July. Filename: Copy of Roadability Data (Everport).xlsx

_____. 2023. Email from Shozo Yoshikawa, P.E., Transportation Engineer, Port of Los Angeles Goods Movement Division to Justin Houterman (Legal). January 13. Subject: LAXT loop trip generation and VMT calcs. Attached spreadsheet: LAXT Loop trip gen vmt import benefit stream calcs 20230112.xlsx

POLA (Port of Los Angeles). 2025. Port of Los Angeles Inventory of Air Emissions – 2024. Technical Report. Accessed December 19, 2025. https://kentico.portoflosangeles.org/getmedia/d9720ae3-fd18-4b0e-9d32-380df2e475db/2024-air-emissions-inventory.

~~POLA (Port of Los Angeles). 2022. Port of Los Angeles Inventory of Air Emissions – 2021. Accessed April 15, 2024. https://kentico.portoflosangeles.org/getmedia/f26839cd-54cd-4da9-92b7-a34094ee75a8/2021_Air_Emissions_Inventory.~~

SPBP (San Pedro Bay Ports). 2017. San Pedro Bay Ports Clean Air Action Plan 2017 Final. Accessed April 15, 2024. https://kentico.portoflosangeles.org/getmedia/9d371f7b-9812-4c75-bcfd-23e83a191435/CAAP_2017_Draft_Document-Final.

SCAQMD (South Coast Air Quality Management District). 2008. Final Localized Significance Threshold Methodology. Revised July 2008. Accessed April 18, 2024. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

_____. 2009. Localized significance Thresholds, Appendix C - Mass Rate LST Look-up Tables. Accessed April 15, 2024. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2.

_____. 2017. Risk Assessment Procedures for Rules 1401, 1401.1 and 212. Version 8.1. September 1, 2017. Accessed April 19, 2024. https://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=12.

_____. 2019. Community Emissions Reduction Plan (CERP). Accessed April 15, 2024. https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf?sfvrsn=8.

_____. 2022. SCAQMD Air Quality Management Plan. Accessed April 15, 2024. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16.

_____. 2023. SCAQMD Air Quality Significance Thresholds. January. Accessed April 15, 2024. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

Section 3.2 Energy

City of Los Angeles, 2019. City of Los Angeles Sustainable City pLAn. Accessed April 15, 2024. https://plan.lamayor.org/.

CEC (California Energy Commission). 2024. Power Content Label, LADWP for 2022. Accessed April 15, 2024. https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure-program/power-content-label.

_____. 2023. Refinery Inputs and Production, Weekly Fuels Watch Dashboard. Data last updated: September 27, 2023. Accessed April 15, 2024. https://www.energy.ca.gov/data-reports/reports/weekly-fuels-watch/refinery-inputs-and-production.

Section 3.3 Greenhouse Gas Emissions

CAPCOA (California Air Pollution Control Officers Association). 2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January. Accessed April 30, 2026. https://planning.lacity.gov/eir/8150Sunset/References/4.E.%20Greenhouse%20Gas%20Emissions/GHG.02_CAPCOA%20CEQA%20and%20Climate%20Change.pdf

CARB (California Air Resources Board). 2022. Climate Change Scoping Plan. Accessed April 15, 2024. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents/.

_____. 2023. California Greenhouse Gas Inventory for 2000-2021 – by Category as Defined in the 2008 Scoping Plan. Accessed April 17, 2024. https://ww2.arb.ca.gov/sites/default/files/2023-12/ghg_inventory_scopingplan_sum_2000-21.pdf.

City of Los Angeles. 2016. City of Los Angeles General Plan – Mobility Element. Accessed June 6, 2024. https://planning.lacity.gov/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf.

_____. 2019. Sustainable City pLAn. Accessed April 15, 2024. https://plan.lamayor.org/.

_____. 2021. General Plan Air Quality Element. Accessed April 15, 2024. https://planning.lacity.gov/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

OEHHA (Office of Environmental Health Hazard Assessment, California Environmental Protection Agency). 2018. Indicators of Climate Change in California. Accessed

April 15, 2024. https://oehha.ca.gov/climate-change/document/indicators-climate-change-california.

OPC/OST (California Ocean Protection Council, California Ocean Science Trust). 2024. California Sea Level Rise Guidance: 2024 Science and Policy Update. Accessed January 31, 2025. https://opc.ca.gov/wp-content/uploads/2024/05/California-Sea-Level-Rise-Guidance-2024-508.pdf.

LAHD (Los Angeles Harbor Department). 2016. CEQA/EIR Projects and Public Notices. https://www.portoflosangeles.org/environment/public_notices.asp. Projects Certified by the Board of Harbor Commissioners. Website accessed August 1, 2016. Excel Spreadsheet: GHG Emission Capture Rate from Certified POLA CEQA Documents Using 10,000 MT/yr Threshold.

_____. 2017. Berths 97-109 [China Shipping] Container Terminal Project Draft Supplemental Environmental Impact Report, June. SCH No. 2003061153.

_____. 2018. Port of Los Angeles Sea Level Rise Adaptation Study. Final Draft. 10 September. Available at: https://kentico.portoflosangeles.org/getmedia/29acdb3a-c9a1-4e9c-a233-0a4e74438a3c/2018_Sea_Level_Rise_Adaptation_Study.

SCAQMD (South Coast Air Quality Management District). 2008. Draft Guidance Document, Interim CEQA Greenhouse Gas (GHG) Significance Threshold, Attachment E. October. Accessed April 29, 2026. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2.

_____. 2016. Personal communication between L. Granovsky/iLanco Environmental and Mike Krause/SCAQMD regarding the SCAQMD GHG significance threshold for industrial projects. July 29.

_____. 2023. South Coast AQMD Air Quality Significance Thresholds. January. Accessed April 15, 2024. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

_____. 2024. Annual Emissions Reporting. https://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting.

SPBP (San Pedro Bay Ports). 2017. San Pedro Bay Ports Clean Air Action Plan 2017 Final. Accessed April 15, 2024. https://kentico.portoflosangeles.org/getmedia/9d371f7b-9812-4c75-bcfd-23e83a191435/CAAP_2017_Draft_Document-Final.

The Climate Registry. 2024. Climate Registry Default Emission Factors. February. Accessed April 30, 2026. https://theclimateregistry.org/wp-content/uploads/2024/03/2024-Emission-Factor-Document_FINAL.pdf.

Section 3.4 Hazards and Hazardous Materials

City of Los Angeles. 2021. Los Angeles Safety Element of the General Plan. Adopted November 24, 2021. Accessed June 25, 2025. https://planning.lacity.gov/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf

_____. 2023. Base Emergency Operations Plan. Revised September 14, 2023. Accessed July 2025. https://emergency.lacity.gov/sites/g/files/wph1791/files/2023-10/Emergency%20Operations%20Base%20Plan_2023.pdf

_____. 2024. Local Hazard Mitigation Plan. Adopted August 30, 2024. Accessed July 2025. https://emergency.lacity.gov/city-readiness/local-hazard-mitigation-plan

_____. 2025. Municipal Code, Seventh Edition, current through legislation effective March 31, 2025. Accessed July 2025. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-422835

Denger, Mark. 2015. Historic California Posts, Naval Air Station, Terminal Island. Accessed April 2024. https://militarymuseum.org/NASTeminalIsland.html.

DoN (U.S. Department of Navy). 2024. Letter to Ms. Irena Edwards, California Environmental Protection Agency from David C. Darrow, BRAC Environmental Coordinator. Subject: Final Five-Year Review Report Installation Restoration Program Sites 1 Through 6A and 8 Through 14, Former Naval Complex Long Beach, Long Beach, California. December 10.

DTSC (Department of Toxic Substances Control). 2024. Hazardous Waste and Substances Site List (CORTESE). Accessed April 2024. https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29.

EDR (Environmental Data Resources), 2024a. The EDR Radius Map™ Report with GeoCheck®, LAXT Maritime Support Facility Project, 740 Terminal Way, San Pedro, CA 90731, Inquiry Number: 7596150.2s, March 15, 2024.

_____. 2024b. The EDR Aerial Photo Decade Package, LAXT Maritime Support Facility Project, 740 Terminal Way, San Pedro, CA 90731, Inquiry Number: 7596150.5, March 15, 2024.

Jacobs. 2025. Conceptual Design Report Port of Los Angeles (POLA) Terminal Island Marine Support Facility (TIMSF): 30% Design Submittal. March 20.

LAHD (Los Angeles Harbor Department). 2017. Environmental Baseline Investigation, Former LAXT Remote Storage Area & Customs Building Property, 300 S. Ferry Street & 750 Eldridge Street, Terminal Island, California 90731. Prepared for City of Los Angeles Harbor Department Environmental Management Division, APP 050930-549 H. Prepared by Pacific Edge Engineering, Inc. November 3. PDF.

_____. 2026. Soil Management Plan: Terminal Island Maritime Support Facility (TIMSF) & Grade Separation (TIGS), Terminal Island, California. Prepared by Pacific Edge Engineering, Inc. May 1. PDF.

Los Angeles Department of Building and Safety (LADBS). n.d. Atlas. Accessed July 2025. https://ladbs.org/atlas/

Los Angeles Port Police. 2024. Los Angeles Port Police Policy Manual. November 8, 2024. Accessed July 2025. https://kentico.portoflosangeles.org/getmedia/c9fa7d7a-b857-4864-9cc4-5b614c477a50/los-angeles-port-police-policy-manual

Port of Los Angeles (POLA). 2013. Port Master Plan. Accessed July 2025. https://kentico.portoflosangeles.org/getmedia/adf788d8-74e3-4fc3-b774-c6090264f8b9/%E2%80%8Cport-master-plan-update-with-no-29_9-20-201

_____. 2025. Specification No. 2844, Dewatering, Section 312319.

Port of Los Angeles and Port of Long Beach (POLA and POLB). 2009. Port of Los Angeles and Port of Long Beach Water Resources Action Plan (WRAP), Final Report, August 2009. https://kentico.portoflosangeles.org/getmedia/d5b77f8e-46e0-46d1-a2b9-8cc15bca75cb/WRAP_Final

USACE (United States Army Corps of Engineers). 2007. Draft Final Site Inspection Report, Former Naval Air Base, Terminal Island Site, Los Angeles County, California. Accessed April 2024. https://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=80001049&doc_id=5010700.

Chapter 4 Cumulative Analysis

Caltrans (California Department of Transportation). 2023a. Vincent Thomas Bridge Fact Sheet. Accessed March 8, 2024. https://virtualeventroom.com/caltrans/vtb/docs/archive/collateral/Caltrans-VTB-Fact-Sheet-Eng.pdf.

_____. 2023b. California Invests $3.7 Billion to Continue Rebuilding Transportation Infrastructure for All Travelers. Accessed March 8, 2024. https://dot.ca.gov/caltrans-near-me/district-4/d4-news/2023-10-20-rebuilding-transportation-infrastructure#:~:text=Funding%20will%20improve%20bridges%2C%20travel,more%20convenient%20options%20for%20travelers.

CARB (California Air Resources Board). 2006. Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach. Accessed May 6, 2024. https://ww2.arb.ca.gov/sites/default/files/barcu/regact/marine2005/portstudy0406.pdf.

_____. 2023. California Greenhouse Gas Inventory for 2000-2021 – by Category as Defined in the 2008 Scoping Plan. Accessed May 6, 2024. https://ww2.arb.ca.gov/sites/default/files/2023-12/ghg_inventory_scopingplan_sum_2000-21.pdf.

CEQAnet. 2000. Port of Long Beach, Piers G and J Terminal Redevelopment – HDP #00-007, Notice of Determination. Accessed March 8, 2024. https://ceqanet.opr.ca.gov/2000021021/3.

_____. 2001. Pacific Corridors Redevelopment Project. Accessed March 8, 2024. https://ceqanet.opr.ca.gov/2001101138/2.

_____. 2020. Port of Los Angeles Pier 400 Corridor Storage Tracks Expansion. Accessed March 15, 2024. https://ceqanet.opr.ca.gov/2018081086/4.

_____. 2022. Second Addendum to the Permit Renewal for So. Cal. Ship Services Final Initial Study and Mitigated Negative Declaration. March. Accessed March 15, 2024. https://ceqanet.opr.ca.gov/2018061043/4.

Construction Journal. 2022. Pier S Container Support Facility – (1518-3137) – Port of Long Beach. November. Accessed March 15, 2024. https://www.constructionjournal.com/projects/details/49793fe36de1439a99a5d8dfdb9d5827.html.

OEHHA (Office of Environmental Health Hazard Assessment, California Environmental Protection Agency). 2018. Indicators of Climate Change in California. Accessed May 6, 2024. https://oehha.ca.gov/climate-change/document/indicators-climate-change-california.

Pacific Maritime Magazine. 2023. Infrastructure Projects in Full Swing at Major West Coast Ports. Accessed March 15, 2024. https://pacmar.com/article/infrastructure-projects-in-full-swing-at-major-west-coast-ports/.

POLA (Port of Los Angeles). 2018. Terminal Island (Pier 400) Railyard Enhancement Project Draft Initial Study/Mitigated Negative Declaration. Accessed March 8, 2024. https://kentico.portoflosangeles.org/getmedia/7a06ce44-f99d-4383-ade4-1d023fb5171a/Draft-IS-MND-TI-Railyard.

_____. 2023a. Port of Los Angeles Releases Draft Request for Proposals on Cruise Terminal Development. January 31. Accessed March 8, 2024. https://www.portoflosangeles.org/references/2023-news-releases/news_013123_cruise_draft_rfp.

_____. 2023b. Fiscal Year 2023/24 Consideration of Proposed Budget for Adoption. Accessed March 15, 2024. https://kentico.portoflosangeles.org/getmedia/3a7418c0-6052-4abe-b432-9e390a34807c/item-3_fp-a_adoption-of-proposed-fy-2023-24-annual-budget_presentation.

_____. 2024. Environmental Documents. Accessed March 15, 2024. https://www.portoflosangeles.org/environment/environmental-documents.

_____. 2025. POLA Cumulative Projects Table – May 2025. Attachment to Email from Celia Sanchez Zelaya, Port of Los Angeles, to Lisa Blewitt, Aspen Environmental Group. Subject: Attorney Client Privilege - Privileged and Confidential: B44 - Updated Cumulative Projects List. July 1, 2025.

POLB (Port of Long Beach). 2020. Port Receives $14.5 Million Grant for Rail Project. Accessed March 15, 2024. https://polb.com/port-info/news-and-press/port-receives-14-5-million-grant-for-rail-project-04-09-2020/#:~:text=The%20Port%20of%20Long%20Beach%20has%20been%20awarded%20a%20%2414.5,locomotive%20idling%20and%20improve%20safety.

_____. 2022. Feds Greenlight Channel Deepening Project. August. Accessed March 8, 2024. https://polb.com/port-info/news-and-press/feds-greenlight-channel-deepening-project-08-31-2022/.

_____. 2023. Projects – Pier B On-Dock Support Facility. Accessed March 8, 2024. https://polb.com/port-info/projects/#pier-b-on-dock-support-facility.

PR Newswire. 2019. Harbor Performance Enhancement Center Files Notice of Claim Against Port of Los Angeles and City of Los Angeles. December. Accessed March 8, 2024. https://www.prnewswire.com/news-releases/harbor-performance-enhancement-center-files-notice-of-claim-against-port-of-los-angeles-and-city-of-los-angeles-300975414.html.

SCAG (Southern California Association of Governments). 2020. Transportation System Goods Movement Technical Report. Accessed March 15, 2024. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_goods-movement.pdf.

SCAQMD (South Coast Air Quality Management District). 2003. Appendix D. Cumulative Impact Requirements Pursuant to the California Environmental Quality Act. Accessed May 6, 2024. https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf.

_____. 2021. Multiple Air Toxics Exposure Study (MATES V) in the South Coast AQMD. Final Report, August 2021. Accessed May 6, 2024. http://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf?sfvrsn=6.

_____. 2022. 2022 Air Quality Management Plan. December. Accessed May 6, 2024. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16.

Urbanize Los Angeles. 2018. Port of Los Angeles to Seek Developer for Cabrillo Way Marina. Accessed March 8, 2024. https://la.urbanize.city/post/port-los-angeles-seek-developer-cabrillo-way-marina.

USACE (U.S. Army Corps of Engineers). 2019. Final Environmental Assessment for Surfside-Sunset Beach Nourishment Project Stage 13. Accessed March 8, 2024. https://usace.contentdm.oclc.org/utils/getfile/collection/p16021coll7/id/23294.

_____. N.D. Surfside Sunset. Accessed March 8, 2024. https://www.spl.usace.army.mil/Missions/Civil-Works/Projects-Studies/Surfside-Sunset/.

Chapter 5 Comparison of Alternatives

No references are included in Chapter 5.

Chapter 6 Significant Irreversible Changes

No references are included in Chapter 6.

Chapter 7 Growth-Inducing Impacts

City of Los Angeles. 2021. Housing Element of the City of Los Angeles General Plan. Accessed March 8, 2024. https://planning.lacity.org/odocument/bde50bc0-5f1f-4e88-a5cf-06a12e1d8078/ Chapter_1_-_Housing_Needs_Assessment_(Adopted).pdf.

Chapter 10 Responses to Comments

CARB (California Air Resources Board). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. Accessed November 5, 2025. https:// www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf.

City of Los Angeles. 2019. Sustainable City pLAn. Accessed April 15, 2024. https://plan.lamayor.org/.

DTSC (Department of Toxic Substances Control). 2001. DTSC Information Advisory Clean Imported Fill Material Fact Sheet. October. Accessed October 31, 2025. https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/.

_____. 2015. Preliminary Endangerment Assessment Guidance Manual. January 1994 (Revised October 2015). Accessed October 31, 2025. https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/06/PEA_Guidance_Manual.pdf.

LAHD (Los Angeles Harbor Department). 2017. Environmental Baseline Investigation: Former LAXT Remote Storage Area & Customs Building Property, 300 S. Ferry Street & 750 Eldridge Street, Terminal Island, California 90731. Prepared for City of Los Angeles Harbor Department, Environmental Management Division. APP 050930-549 H. Prepared by Pacific Edge Engineering, Inc. for the City of Los Angeles Harbor Department, Environmental Management Division. APP 050930-549 H. November 3.

_____. 2023. Email from Shozo Yoshikawa, P.E., Transportation Engineer, Port of Los Angeles Goods Movement Division to Justin Houterman (Legal). January 13. Subject: LAXT loop trip generation and VMT calcs. Attached spreadsheet: LAXT Loop trip gen vmt import benefit stream calcs 20230112.xlsx

POLA (Port of Los Angeles). 2018. Port of Los Angeles Sea Level Rise Adaptation Study. Final Draft. September. Prepared for the Port of Los Angeles by AECOM. pp. 14-21. Accessed February 9, 2026. https://kentico.portoflosangeles.org/getmedia/29acdb3a-c9a1-4e9c-a233-0a4e74438a3c/2018_Sea_Level_Rise_Adaptation_Study.

_____. 2025. Port of Los Angeles Inventory of Air Emissions – 2024. Technical Report. Accessed December 19, 2025. https://kentico.portoflosangeles.org/getmedia/d9720ae3-fd18-4b0e-9d32-380df2e475db/2024-air-emissions-inventory.

San Pedro Bay Ports. 2010. San Pedro Bay Ports Clean Air Action Plan, 2010 Update. October. Appendix B: Final Bay-Wide Regional Human Health Risk Assessment Tool for Diesel Exhaust Particulate Matter (DPM). Accessed February 12, 2026. https://kentico.portoflosangeles.org/getmedia/b8090a77-5287-43e6-b98b-2edf9ed8e710/12_21_2010_CAAP_update_full_text.

_____. 2025. San Pedro Bay Ports Clean Air Action Plan, 2024 Update: Feasibility Assessment for Drayage Trucks. September. Accessed November 13, 2025. https://cleanairactionplan.org/strategies/trucks/.

SCAQMD (South Coast Air Quality Management District). 2019. Community Emissions Reduction Plan (CERP). Accessed April 15, 2024. https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf?sfvrsn=8.

Chapter 10
Responses to Comments

10.1. Distribution of the Draft EIR and Partially Revised and Recirculated Draft EIR

The Draft Environmental Impact Report (EIR) prepared for the Los Angeles Harbor Department (LAHD) was distributed to the public and regulatory agencies on September 15, 2025, for a 45-day review period, which ended on October 30, 2025. Printed copies of the Draft EIR were available for review at the Los Angeles Harbor Department, Environmental Management Division, 425 South Palos Verdes Street, San Pedro, California 90731.

In addition to printed copies of the Draft EIR, digital copies were made available. Due to the size of the document, the 12 digital copies were prepared as a series of PDF files to facilitate downloading and printing and were available on the Port website at https://www.portoflosangeles.org/ceqa. Interested parties were required to provide written comments on the Draft EIR, which must have been postmarked by October 30, 2025. The LAHD conducted a public hearing regarding the Draft EIR on October 1, 2025, to provide an overview of the Proposed Project and alternatives and to accept public comments on the Proposed Project, alternatives, and environmental document. No verbal comments were made at the public hearing. The LAHD received five comment letters on the Draft EIR during the public review period. Table 10-1 presents a list of the agencies that commented on the Draft EIR. No organizations or individuals commented on the Draft EIR.

Table 10-1. Public Comments Received on the Draft EIR

Letter Code	Date	Organization	Page
State, Regional, and Local Government			
CCC	10/30/2025	California Coastal Commission	10-4
CALTRANS	10/30/2025	California Department of Transportation	10-8
CARB	10/24/2025	California Air Resources Board	10-11
DTSC	10/22/2025	Department of Toxic Substances Control	10-22
SCAQMD	10/30/2025	South Coast Air Quality Management District	10-28
ASA	02/20/2026	American Soybean Association	10-44

Following the close of the Draft EIR public comment period, and in response to comments received on the Draft EIR from the California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) regarding the

methodologies employed in the Draft EIR to calculate proposed Project emissions, the emissions basis was revised and updated emissions modelling conducted. As a result, a Partially Revised and Recirculated Draft EIR was prepared and circulated to government agencies, organizations, and interested individuals for a 45-day review period beginning on January 26, 2026 and ending on March 11, 2026. Printed copies of the Partially Revised and Recirculated Draft EIR were available for review at the Los Angeles Harbor Department, Environmental Management Division, 425 South Palos Verdes Street, San Pedro, California 90731; and a digital copy was available on the Port's website at https://www.portoflosangeles.org/ceqa. One comment letter from the American Soybean Association was received during the Partially Revised and Recirculated Draft EIR review period. No other agencies, organizations, or individuals commented on the Partially Revised and Recirculated Draft EIR.

10.2. Responses to Comments

In accordance with CEQA (State CEQA Guidelines §15088), the LAHD has evaluated the comments on environmental issues received from commenters and has prepared written responses to each comment pertinent to the adequacy of the environmental analyses contained in the EIR (Draft EIR and Partially Revised and Recirculated Draft EIR). Comment letters and responses to the comments are presented in Section 10.3 (*State, Regional, and Local Governments*).

In compliance with State CEQA Guidelines Section 15088(b), the written responses address the environmental issues raised. In addition, where appropriate, the basis for incorporating or not incorporating specific suggestions into the Proposed Project is provided. In each case, the LAHD has expended a good faith effort, supported by reasoned analysis, to respond to comments. Some comments have prompted revisions to the text of the EIR, which are reflected in the respective issue area sections of this Final EIR. A copy of each comment letter is provided, and responses to each comment letter immediately follow. All of the comments received and the responses to those comments will be considered by the decision-makers prior to taking any action on the Proposed Project.

A lead agency is required to recirculate a Draft EIR when the agency adds "significant new information" to the EIR after the close of the public comment period but prior to certification of the Final EIR (Public Resources Code, §21092.1; State CEQA Guidelines, §15088.5). "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." (State CEQA Guidelines §15088.5(a)) "Significant" new information includes information showing that "(1) [a] new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented [;] or (2) [a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance" (State CEQA Guidelines §15088.5 (a)(1), (a)(2)). In response to comments received from CARB and SCAQMD regarding the methodologies employed in the Draft EIR to calculate proposed Project emissions, the emissions basis was revised and updated emissions modelling conducted. As a result, a new significant, unavoidable impact pertaining to operational emissions that exceed SCAQMD peak day regional

emission thresholds of significance was identified for the Reduced Project Alternative (Alternative 2) in Section 3.1 (*Air Quality and Health Risk*), and a new potentially significant but mitigable impact pertaining to the generation of GHG emissions during Project construction and operations was identified for the Proposed Project in Section 3.3 (*Greenhouse Gas Emissions*). Accordingly, a Partially Revised and Recirculated Draft EIR was prepared and circulated to government agencies, organizations, and interested individuals for a 45-day review period beginning on January 26, 2026 and ending on March 11, 2026. The LAHD received one comment letter on the Partially Revised and Recirculated Draft EIR during the public review period, from the American Soybean Association, which is presented below in Section 10.4 (*Organizations*).

The responses to comments provided herein contain the following information:

- First and foremost, the responses address the environmental concerns raised by the commenters, and describe how they are addressed in the document;
- They point to the adjusted methodologies used to recalculate Project emissions in the Partially Revised and Recirculated Draft EIR;
- They provide corrections to the text, where such corrections are warranted; and,
- They expand on or provide minor clarifications to information already included in the Draft EIR in those instances where comments question this information.

LAHD staff, therefore, find that this Final EIR, which encompasses the Draft EIR, Partially Revised and Recirculated Draft EIR, and all supporting studies, is adequate and supported by substantial evidence as required by CEQA.

10.3. State, Regional, and Local Governments

California Coastal Commission

Comment Letter

STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY GAVIN NEWSOM, *Governor*

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
301 E Ocean Blvd, Suite 300
Long Beach, CA 90802
(562) 590-5071

October 30, 2025

Lisa Wunder, Director of Environmental Management
Port of Los Angeles

SENT VIA ELECTRONIC MAIL

RE: Terminal Island Maritime Support Facility Project, Port of Los Angeles
Coastal Commission Staff Comments on Draft Environmental Impact Report

Lisa Wunder,

Thank you for the invitation to comment on the Draft Environmental Impact Report (EIR) for the Terminal Island Maritime Support Facility Project (project) at 740 Terminal Way in the Port of Los Angeles (Port). As described in the EIR, the project would be located within the Port's coastal development permit jurisdiction and subject to the requirements of the Port's Port Master Plan (PMP). Commission staff agree with the conclusion from the EIR that the proposed project would require a PMP amendment for the redesignation of the site's current land use designations of Container, Liquid Bulk, and Maritime Support to a dual land use designation of Container and Maritime Support.

As proposed, the project involves grading and paving of the approximately 80-acre site for construction and operation of a chassis support and container storage facility. The following comments and questions are intended to inform future environmental review, PMP amendment, and permitting for the proposed project to be consistent with the Coastal Act.

With the amount of hazardous soils identified in the EIR as being present on the project site from previous development, one question raised is the amount of hazardous soils that will be left unremediated by the proposed development of the site. The Port should assess whether residual contaminants in the soil could be susceptible to mobilization and impact water quality in the future as sea levels and groundwater levels may rise. Per the Port of Los Angeles PMP policy 2.1, the Port must address any potential water quality impacts that could occur during the anticipated design life of the project. **CCC-1**

Also relating to soils, it is important that the Port thoroughly reviews the sourcing and usage of sediment being removed or used in port projects. Any clean beach compatible material present on the project site should be preserved for use on beaches in the area that are threatened by sea level rise, and the development should avoid use of such material for fill or capping of this site. **CCC-2** Finally, the sediment that would be affected by ground disturbing activities should be analyzed for potential to contain archaeological, paleontological, and tribal cultural resources. California Native American Tribes should be consulted with to confirm potential presence of tribal cultural resources. If there is potential for the discovery of such resources, it is recommended to require Tribal cultural monitoring during construction activities. **CCC-3**

Please note that the comments provided herein are preliminary in nature. Coastal Commission staff requests notification of any future activity associated with this project to provide more specific comments as the project develops. Staff also recommends early coordination on any associated PMP Amendment. Thank you for the opportunity to comment on the Draft EIR. Please contact me at seth.villanueva@coastal.ca.gov with any questions.

Terminal Island Maritime Support Facility Project
Coastal Commission Staff Comments on Draft Environmental Impact Report
Page 2 of 2

Sincerely,

S Villanueva

Seth Villanueva
Coastal Program Analyst

Responses

Response to Comment CCC-1:

LAHD has completed soil, soil gas, and groundwater testing at the Project site and is consolidating historical data to determine if deeper sampling is needed. Under the Proposed Project, construction would involve routine site preparation, grading, excavation, and infrastructure and building construction, during which known or not previously identified contaminated soils, soil vapor, and/or groundwater not previously remediated may be encountered. As outlined in mitigation measure (MM) HAZ-1, preconstruction sampling and testing would be completed within the area of Project disturbance, and where Project buildings and structures would be built, allowing for implementation of the Soil Management Plan (SMP), which has been included as Appendix D to the Final EIR. These data will be analyzed with respect to estimated groundwater level rise in response to sea level changes to evaluate future impacts to water quality given the 25-year Term Permit.

Soils outside the area of Project disturbance would not be disturbed or remediated – this is an existing condition that is not related to the Project.

A review of the mapped sea level rise (SLR) scenarios – 12, 24, 37, and 66 inches – evaluated under two tide conditions: (1) daily high tide and (2) storm tide, shows that the Project site would not be inundated as a result of SLR and there would be no overtopping of the shoreline in the Project area (POLA, 2018 – Figure E-4). Therefore, no impacts related to SLR would occur. The maps also show low-lying areas (in green) which are below the mapped water surface elevation but remain hydraulically disconnected from the flood source and highlight possible vulnerability to stormwater ponding, elevated groundwater, and backflow into stormwater systems. Two such areas are within the loop, at the northeast corner and southwest corner; however, the loop would be covered with asphalt pavement as part of the Proposed Project limiting the potential for infiltration and mobilization of any residual soil contamination.

Response to Comment CCC-2:

Although the Proposed Project does not include dredging that could generate sediment or clean sand, site preparation would generate excess soil for export. MM-HAZ-1 includes a Project-specific SMP to outline the procedures for handling, storage, transport, reuse or disposal of contaminated soil (see Final EIR Appendix D). Implementation of the SMP would determine the proper reuse or disposal of impacted soil. In addition, the LAHD Environmental Management Division has conducted a qualitative assessment of the soil proposed to be removed from the Project site during remediation, and has determined that this soil is not suitable for beach replenishment due to grain size, etc. Port Master Plan Policy 3.3 requires the Port to consider all impacts involving filling in compliance with California Coastal Act 30705.

Response to Comment CCC-3:

The Notice of Preparation/Initial Study (NOP/IS) (Final EIR Appendix A) evaluated whether the Proposed Project would affect archaeological, paleontological, or tribal cultural resources. As documented in the NOP/IS, the Native American Heritage Sacred Lands File search conducted in 2022 was negative. The Port also conducted AB 52 tribal outreach in 2023. One response for consultation as received on January 20, 2023, from

the Gabrieleño Band of Mission Indians-Kizh Nation (Kizh Nation). Formal consultation with the Kizh Nation was initiated on February 21, 2023, during which the Port informed the Kizh Nation that the Project was located entirely on artificial fill soil. It was determined that no formal meeting was necessary, and consultation was concluded. Because the Project site is located on harbor dredged material and industrial-grade artificial fill, ground-disturbing activities would have no impact on archaeological, paleontological, or tribal cultural resources. Therefore, a more detailed analysis of these topics was not included in the Draft EIR and a tribal monitor during construction activities is unnecessary.

California Department of Transportation

Comment Letter

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 266-3574
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

October 30, 2025

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

RE: Terminal Island Maritime Support Facility Project – Draft Environmental Impact Report (DEIR)
SCH# 2023120181
GTS# 07-LA-2023-04902
Vic. LA 47 PM: 2.142

Dear Lisa Wunder,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Terminal Island Maritime Support Facility Project (Project) involves the development and operation of a chassis support facility on an approximately 89-acre site at 740 Terminal Way, San Pedro, CA 90731 at the Port of Los Angeles. The Project would construct and install office trailers, maintenance and repair facilities, chassis stalls, and appurtenant water and electrical infrastructure. The existing vacant Eldridge Street office building (750 Eldridge Street, San Pedro, CA 90731) would also be refurbished to support operations. The chassis support facility could be operated by multiple companies, each of which would likely conduct chassis support operations out of separately built infrastructure. While not certain at this time, it is assumed that up to four different companies could operate on the site at once; however, use of the site by a single operator would yield higher throughput. For the purposes of the California Environmental Quality Act (CEQA), the Project operations assume as a worst-case use of the Project site as a chassis support facility and ancillary empty wheeled container storage, operated by a single operator. The Draft EIR evaluates the Project as a facility that involves the storage, repair, and maintenance of chassis as well as the operation of supporting office space(s), including office trailers and the Eldridge Street office building. The Project would be operated for up to 25 years.

After reviewing the DEIR, Caltrans has the following comments:

Due to the project's adjacency to SR 47, please be aware that any project work occurring within, or abutting Caltrans ROW will require an encroachment permit, and all | **CALTRANS-1**

"Provide a safe and reliable transportation network that serves all people and respects the environment."

concerns and requirements must be addressed. This includes any grading, topography, or equipment work that will change the pattern or direction of water runoff in a way that will impact State facilities or ROW. **CALTRANS-1 (cont'd)**

If evidence of the above is discovered during the Lead Agency's review of the project's various permit and design approvals, a condition of approval for issued entitlements shall include a requirement to work with Caltrans' Office of Permits to obtain the appropriate encroachment permits. Final design requirements for any proposed changes to infrastructure within or along Caltrans Right-of-way will be determined by the Office of Permits. At the time of permit application there will be rounds of review and corrections to ensure all design, Right-of-way, access management, water runoff, environmental, and statutory requirements are being addressed.

Caltrans District 7 Office of Permits contact information:
Mailing Address: 100 S Main Street, Ste 100 Los Angeles, CA 90012
Office Hours: 8:00 a.m. to 5:00 p.m. Monday-Friday
Phone: 213-897-3631 | Fax: 213-897-0420 | E-mail: D7.Permits@dot.ca.gov

Please also be aware that the Vincent Thomas Bridge (VTB) Deck Replacement Project is expected to be under construction from October 2025 to March 2027. If the Terminal Island Maritime Support Facility Project will be in construction at the same time as the VTB and/or other projects in the area, coordination with Caltrans and a traffic handling/detour study needs to be done to mitigate impacts. **CALTRANS-2**

Finally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. **CALTRANS-3**

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2023-04902.

Sincerely,

Miya Edmonson

Miya Edmonson
LDR Branch Chief

Cc: State Clearinghouse

Responses

Response to Comment CALTRANS-1:

Table 2-1 of the Final EIR has been revised to identify Caltrans' role as the permitting authority for an Encroachment Permit for any Project work occurring within the Caltrans ROW for SR 47.

Response to Comment CALTRANS-2:

Table 4-1 of the Final EIR has been revised to update the anticipated construction schedule for the Vincent Thomas Bridge Deck Replacement Project. As construction of the Proposed Project is likely to overlap with the Vincent Thomas Bridge Deck Replacement Project, LAHD shall perform all necessary coordination with Caltrans. LAHD has been coordinating closely with Caltrans (including issuance of permits to Caltrans) on their traffic management plan for the planned construction on the Vincent Thomas Bridge from 2026 to 2029.

Response to Comment CALTRANS-3:

LAHD would obtain all necessary permits for the transport of oversized vehicles on State highways. LAHD acknowledges Caltrans' recommendation for large-sized trucks to utilize State highways during off-peak commute periods to the maximum extent feasible.

California Air Resources Board

Comment Letter

CALIFORNIA AIR RESOURCES BOARD

Gavin Newsom, Governor
Yana Garcia, CalEPA Secretary
Lauren Sanchez, CARB Chair

October 24, 2025

Uriel de los Reyes
Environmental Specialist
Los Angeles Harbor Department
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731
udelosreyes@portla.org

Sent via email

Dear Uriel de los Reyes:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Terminal Island Maritime Support Facility Project (Project), State Clearinghouse No. 2023120181. The Project is located within the Port of Los Angeles (Port), which is the lead agency for California Environmental Quality Act (CEQA) purposes.

The Project consists of the construction and operation of a chassis support facility on an approximately 89-acre site in the Port. The Project includes the construction of office and welfare buildings, canopy structures, restrooms, guard booths, maintenance and repair facilities, chassis parking areas, and supporting utility infrastructure. The existing Eldridge Street office building, located within the Project site, would be refurbished for operational use. The facility would support chassis storage, repair, and maintenance activities, as well as related office functions, for up to 25 years. The Project could serve up to an estimated 3,682 and 6,838 truck trips per day, under opening year (year 2027) and year 2046 conditions, respectively. The Port claims these are not new truck trips.

Residences are located to the east of the Project site, with the closest residence located within 6,000 feet of the Project's eastern boundary. In addition to residences, Cabrillo Avenue Elementary School, Mary Star of the Sea Elementary School, and Port of Los Angeles High School are located within a mile of the Project. These residences and schools are located within boundaries of the Wilmington, Carson, West Long Beach community (WCWLB) which is a designated disadvantaged community[1] and was selected for the Community Air Protection Program under Assembly Bill (AB) 617 (C. Garcia, Chapter 136,

[1] A disadvantaged community is defined as an area disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation. (California Health and Safety Code section 39711, subdivision (a).)

Statutes of 2017)[2] because of high cumulative exposure to air pollution. AB 617 requires CARB and air districts to take actions to reduce these exposures and improve air quality. To date, CARB and air districts have invested a cumulative total of 3.7 billion dollars to implement community identified air quality priorities.

To protect the health of the community and nearby sensitive receptors (e.g., residents and school students),[3] CARB urges the Port to (1) provide substantial evidence demonstrating that Project operations will not increase heavy-duty truck activity beyond baseline conditions, (2) substantiate the assumptions used in the DEIR regarding the average 1.87-mile diversion trip distance and the 20-mile heavy-duty truck trip distance during the Project's grading phase, and (3) include a new mitigation measure or project design feature requiring the phased adoption of zero-emission drayage trucks serving the Project.

The Project Must Evaluate the Impact of Increased Exposure to Air Pollution in a Disadvantaged Community

CARB-1

California has committed to address cumulative air quality impacts in communities already facing high pollution burdens, such as the one surrounding the Project, and has adopted legislation to achieve this commitment. AB 617 was signed into law in 2017, and CARB established the Community Air Protection Program to translate AB 617 into action. AB 617 (beginning in 2017), along with additional legislation, AB 197 in 2016, and AB 1749 (beginning in in 2022), requires CARB and air districts to develop and implement emissions reporting and monitoring, and to create plans to reduce exposures and emissions in the communities that are the most impacted by poor air quality– these plans are known as Community Emission Reduction Programs (CERPs).

The California Environmental Protection Agency (CalEPA) is responsible for identifying disadvantaged communities based on geographic, socioeconomic, public health, and environmental hazard criteria. Using the California Communities Environmental Health Screening Tool (CalEnviroScreen 4.0), CalEPA defines disadvantaged communities as those ranking within the top 25% of census tracts most burdened by pollution and socioeconomic stressors. The Project site is located in a census tract with a CalEnviroScreen 4.0 score of 99%, placing it among the most highly impacted areas in the state.

Due to its high cumulative pollution burden, CARB selected WCWLB community to be a part of the Community Air Protection Program and to write a CERP to reduce air pollution

[2] Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.
[3] California Health and Safety Code Section 42705.5, subdivision (a)(5): *leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=42705.5.&lawCode=HSC*

within the community. This Project is within the borders of Wilmington, West Long Beach, and Carson CERP.[4]

CARB-1 (cont'd)

The WCWLB CERP Steering Committee identified its primary concerns as emissions from Refineries, Ports, Neighborhood Truck Traffic, Oil Drilling and Production, and Railyards. To address these concerns, particularly neighborhood truck traffic, the CERP prioritizes reducing emissions from idling heavy-duty diesel trucks and diesel-powered equipment at freight facilities. The CERP includes several incentive projects to reduce the impact of heavy-duty trucks, including incentives to help replace diesel powered trucks with zero- and near-zero emission technology.

To protect the health of people living, working, and attending school in the WCLCB community, the applicant must evaluate the impact of all foreseeable uses for the entire Project area and ensure that its land use decisions, including its decision on this Project, are consistent with the WCWLB CERP in its entirety.

The Port Must Include Substantial Evidence that the Project Would Not Increase Truck trips

CARB-2

The Port does not provide substantial evidence in the DEIR demonstrating that the Project would not increase heavy-duty truck trips traveling to and from the Port. As stated in Chapter 2.5.3 (Operation) of the DEIR, the proposed chassis yard would "serve up to an estimated 3,682 33 and 6,838 truck trips per day, under opening year (year 2027) and year 2046 conditions, respectively."[5] These projected truck volumes represent a substantial level of heavy-duty vehicle activity that could exacerbate air pollution exposures in nearby communities already burdened by some of the highest cumulative concentrations of diesel particulate matter (diesel PM) and nitrogen oxides (NOx).

The DEIR asserts that Project operations would not generate new truck activity but would rather result in a "minor geographic diversion of existing bobtails, as trips are already occurring within the complex."[6] However, this conclusion is unsupported by substantiating evidence. The DEIR does not present any baseline truck trip data, quantitative traffic counts, or modeling results demonstrating that total heavy-duty truck volumes within the Port complex would remain constant following Project implementation. In the absence of a

[4] South Coast Air Quality Management District, Community Emissions Reduction Plan. 2019. Accessible at: *http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025c.pdf?sfvrsn=6*
[5] Port of Los Angeles. Terminal Island Maritime Support Facility Project. September 2025. Page 2-11. Accessible at *https://kentico.portoflosangeles.org/getmedia/4b91ce71-500e-4e6b-acd8-bcd90d9941ea/Maritime-Support-Facility-DEIR-2-0-Project-Description*
[6] Port of Los Angeles. Terminal Island Maritime Support Facility Project. September 2025. Page 2-11. Accessible at *https://kentico.portoflosangeles.org/getmedia/4b91ce71-500e-4e6b-acd8-bcd90d9941ea/Maritime-Support-Facility-DEIR-2-0-Project-Description*

comprehensive, data-driven analysis of current and projected truck activity, the assumption of trip diversion cannot be independently verified.

Given that heavy-duty trucks are the dominant source of operational air pollutant emissions associated with the Project, it is critical that the Final Environmental Impact Report (FEIR) provide substantial evidence demonstrating that the Project will not result in a net increase in total truck trips within the Port area.

CARB-2 (cont'd)

The Trip Length Distances Used to Estimate the Project Air quality Impact are Unsubstantiated

CARB-3

The Project's construction and operational mobile source air pollutant emissions may have been underestimated in the DEIR by using vehicle trip lengths unsupported by substantial evidence. For construction, the DEIR assumes that haul trucks exporting approximately 270,000 cubic yards of soil during the grading phase would travel a 20-mile one-way distance, which reflects a default parameter in the California Emissions Estimator Model (CalEEMod); rather than project-specific data. The DEIR provides no documentation identifying the landfill or disposal sites where the soil would be transported. Without this information, it cannot be determined whether the 20-mile assumption reasonably represents real-world conditions or whether longer hauls are more likely.

CARB-4

For operations, the DEIR assumes that approximately 3,682 daily heavy-duty truck trips serving the proposed Project in the opening year would travel an off-site "diversion distance" of 1.87 miles. This distance was derived from the unverified assumption that these trips would represent a "geographic diversion" of existing heavy-duty truck activity within the San Pedro Bay Ports complex, rather than newly generated truck trips. However, the DEIR provides no data or analytical evidence demonstrating that this assumption accurately reflects actual truck routing or operational patterns. In practice, travel distances between marine terminals and the proposed facility could vary significantly and, in many cases, exceed 1.87 miles, depending on terminal location and roadway configuration.

By relying on default and unsubstantiated trip distance assumptions, the DEIR may have underestimated the Project's mobile-source air pollutant emissions. To fully disclose potential air quality impacts, the FEIR should provide substantial evidence supporting both the construction and operational heavy-duty truck travel distances used in the Project's air quality analysis. If further analysis determines that haul or diversion distances are greater than those assumed in the DEIR, the Port must remodel the Project's construction and operational air quality impacts using updated trip length distances and present the revised results in the FEIR.

The Port Must Include Meaningful Mitigation Measures to Reduce the Project's Impact on Air quality

CARB-5

The Port concluded in Chapter 3.1 (Air Quality and Health Risk) of the DEIR that the operation of the Project would result in a significant impact on air quality. According to Table 3.1-7 (Maximum Daily Unmitigated Operation Emissions, Regional Thresholds), the operation of the fully built Project would emit approximately 73 pounds per day of NOx, which was found to exceed the South Coast Air Quality Management District's (SCAQMD) threshold for significant impact on air quality. To mitigate the Project's operational air quality impact, the DEIR included MM AQ-1 (Zero-Emission Cargo-Handling Equipment). MM AQ-1 requires the tenant to use zero-emission cargo-handling equipment (CHE) at the start of Project operations. The mitigation measure states that if specific CHE types are determined to be infeasible due to operational or infrastructure constraints, the tenant must submit a written feasibility report within 90 days, which will be reviewed and agreed upon by the Board of Harbor Commissioners. After the implementation of MM AQ-1, the Port concluded in the DEIR that the Project's air quality impact would still result in a significant and unavoidable impact under CEQA.

CARB appreciates the inclusion of Mitigation Measure MM AQ-1 in the DEIR; however, the Port must strive to include additional measures to further reduce air pollutant emissions and protect nearby communities. Drayage trucks are among the largest sources of diesel PM and NOx in the region and contribute significantly to localized air quality and health impacts in surrounding neighborhoods. To minimize these impacts, CARB urges the Port to incorporate a new mitigation measure or project design feature in the FEIR that mandates a phased transition to an all zero-emission drayage fleet. This measure should include provisions for installing on-site zero-emission fueling or charging infrastructure and ensuring adequate capacity to support zero-emission truck operations.

In Chapter 3.1 (Air Quality and Health Risk) of the DEIR, the Port acknowledges CARB's Advanced Clean Trucks and Advanced Clean Fleets "may lead to accelerated turnover of older trucks, as electric or other zero-emission models of heavy-duty vehicles become available to the market in the future."[7] The DEIR further notes that, depending on the availability of these technologies and the enforcement of the regulations, a growing fraction of the regional truck fleet could become zero-emission prior to the Project's buildout year. Despite this recognition, the DEIR concludes that "controlling truck technologies is not a feasible mitigation."[8]

[7] Port of Los Angeles. Terminal Island Maritime Support Facility Project. September 2025. Page 3.1-19. Accessible at *https://kentico.portoflosangeles.org/getmedia/2b24c617-5196-486d-9322-b36799fe5a47/Maritime-Support-Facility-DEIR-3-1-Air-Quality-and-Health-Risk*

[8] Port of Los Angeles. Terminal Island Maritime Support Facility Project. September 2025. Page 3.1-19. Accessible at *https://kentico.portoflosangeles.org/getmedia/2b24c617-5196-486d-9322-b36799fe5a47/Maritime-Support-Facility-DEIR-3-1-Air-Quality-and-Health-Risk*

CARB respectfully disagrees with this conclusion. The DEIR's acknowledgment of these statewide regulations and emerging market trends demonstrates that the transition to zero-emission drayage trucks is both foreseeable and achievable within the Project timeframe. The Port has both the authority and opportunity to require project-specific commitments that align with these statewide initiatives and accelerate emission reductions in a community already burdened by diesel PM. **CARB-5 (cont'd)**

A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP).[9] The HVIP is a part of California Climate Investments to incentivize the purchase of zero-emission trucks. Based on CARB's review of the zero-emission trucks listed in the HVIP, there are commercially available electric trucks that can meet the freight transportation needs of individual industrial uses under the proposed Project today.

In addition to the mitigation modifications recommended above, the Port should add the air pollutant emission reduction measures listed below in the FEIR. **CARB-6**

- In construction contracts, include language that requires all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard starting in the year 2022.[10]
- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.

Conclusion

CARB remains concerned about the Project's potential air quality impacts on nearby residents and schools within the WCWLB community. The Port has a critical responsibility to ensure that the Project does not further burden these communities with toxic air pollution. To adequately assess and mitigate the Project's impacts, the FEIR must provide substantial evidence demonstrating that Project operations will not increase heavy-duty truck activity beyond baseline conditions. In addition, the Port should substantiate the assumptions used in the DEIR regarding the average 1.87-mile diversion trip distance and the 20-mile heavy-duty truck trip distance during the Project's grading phase. Finally, CARB strongly recommends that the FEIR include a new mitigation measure or project design feature

[9] Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: *https://californiahvip.org/*

[10] In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: *https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards*

requiring the phased adoption of zero-emission drayage trucks serving the Project to minimize exposure to harmful diesel PM emissions in nearby communities.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues for which CARB does not submit substantive comments.

CARB appreciates the opportunity to comment on the DEIR for the Project and can provide assistance with emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, via email at *stanley.armstrong@arb.ca.gov*

Sincerely,

Matthew O'Donnell, Chief, Risk Reduction Branch

cc: State Clearinghouse
state.clearinghouse@lci.ca.gov

Sam Wang, Program Supervisor- CEQA IGR, South Coast Air Quality Management District
swang1@aqmd.gov

Alejandro (Alex) Sanchez, Air Pollution Specialist, Risk Reduction Branch

Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

Responses

Response to Comment CARB-1:

CARB identifies that the Proposed Project is in an area of high cumulative pollution burden and within the borders of the Wilmington, Carson, West Long Beach Community Emissions Reduction Plan (CERP). However, as an introduction to this comment, CARB incorrectly states that there are residences within 6,000 feet of the Project's eastern boundary. East of the Project site is the West Basin and Long Beach Middle Harbor in the Port of Long Beach. The Draft EIR identifies closer sensitive receptors as liveaboards at marinas located 1 mile north. Residences west of the Project site in San Pedro are at least 1.1 miles away. Because the residential portion of San Pedro was described in Draft EIR Section 3.1.2 (*Environmental Setting*), as 1.3 miles away, the Final EIR includes revisions to reflect the shorter distance. Draft EIR Section 3.1.2 (*Environmental Setting*), also identified existing land uses within a 1,000-foot radius of the Project site to identify sensitive receptors based on City of Los Angeles, Department of City Planning (City of Los Angeles, 2019), and CARB (CARB, 2005) recommendations for the separation of sensitive land uses from freeways, high-traffic roads, and distribution centers. Section 3.1.2 (*Environmental Setting*), of the Final EIR has been revised to clarify the names of the nearest schools and proximity of San Pedro neighborhoods, which are located more than 1 mile from the Project site.

Draft EIR Section 3.1 (*Air Quality and Health Risk*), Impact AQ-6 reviews Project consistency with *Chapter 5c: Ports*, of the September 2019 Final CERP (SCAQMD, 2019). The Proposed Project was found to be consistent with the CERP based on the air quality priorities identified for the Ports. With the design of the Proposed Project including PF AQ-1 (*Zero-Emissions Operational Equipment*) and MM AQ-1 (*Zero-Emissions Cargo-Handling Equipment*), and with Clean Truck Program requirements in place for trucks accessing the site, no conflict would occur with the priorities of the CERP (SCAQMD, 2019). The CERP does not govern land use decisions, and land use authority is governed within the Port Master Plan, which includes the land use designation that is compatible for this Project. There are no other reasonably foreseeable uses identified within this Project footprint. No further analysis is necessary.

Response to Comment CARB-2:

The Draft EIR relied on travel forecasting by LAHD Goods Movement Division (GMD) for heavy-duty truck travel patterns, including the changes in travel patterns that could occur with the Proposed Project. By nature of being a proposed chassis yard, the Project itself would not increase truck trips or create a new origin or destination for truck trips. Rather, the Project would divert existing trucks to frequent the Project site as opposed to other existing locations as described in Draft EIR Section 2.5.3 (*Operation*). Stated differently, there is no substantial evidence to support an assumption that overall truck trips would potentially increase by nature of creating additional chassis/container storage space and ancillary uses. This is because the number of containers and resulting truck trips are driven by TEUs, not storage.

To illustrate this further, under 'No Project' conditions, bobtails would travel directly to a container terminal to retrieve a chassis, have an import or empty container placed onto the chassis, and then transport this container to a facility outside the Port Complex. With the Proposed Project, the same bobtail would first stop at the Project site to obtain a chassis, then would travel to the terminal to retrieve a container, and finally would

transport the container to its destination facility. As such, the Project is an ancillary use in the truck drayage operations that does not produce a unique new truck trip. Impact AQ-3 in the Final EIR Section 3.1.5 (*Impact Analysis*), has been revised to clarify the source of data used for travel forecasting and the change in truck trip lengths as a result of trip diversions.

Response to Comment CARB-3:

The Draft EIR recognizes that soil contamination exists at varying degrees and handling, managing, and transport of soil would depend on additional site characterization, including study required by mitigation measure (MM) HAZ-1. Prior investigation of the site indicates generally low levels of contamination (LAHD, 2017). Accordingly, the excavation design reflects that most of the soils would be non-hazardous under both state and federal law. Site delineation and additional data collection within the Project site would determine any portions of exported soil requiring disposal at a Port-approved Class 1 hazardous waste facility.

In response to CARB's comment and to quantify emissions from the potential for longer hauling distances needed for treatment and disposal of contaminated soils, the Partially Revised and Recirculated Draft EIR reflected new assumptions for hauling trip lengths during site preparation. Specifically, approximately 20 percent of haul truck travel are assumed to be up to 200 miles to either the Class I Buttonwillow or Kettleman Hills hazardous waste disposal facilities in the San Joaquin Valley, and the remaining 80 percent would be likely to find a Class II or III disposal site within 50 miles of Terminal Island (e.g., to Azusa); reuse of soil onsite is not accounted for in analysis of truck trips. The revised assumptions presented in the Partially Revised and Recirculated Draft EIR (Impact AQ-1) and this Final EIR include up to 100 daily round trips for haul trucks during soil export. On this basis, the air pollutant and GHG emissions estimates in Final EIR Section 3.1 (*Air Quality and Health Risk*), and Section 3.3 (*Greenhouse Gas Emissions*), have been revised to reflect the potential for soil exports to travel an average distance of 80 miles per one-way trip. This updated analysis was presented in the Partially Revised and Recirculated Draft EIR and are reflected in Section 3.1 (*Air Quality and Health Risk*) and Section 3.3 (*Greenhouse Gas Emissions*) of this Final EIR.

Response to Comment CARB-4:

The EIR (Draft EIR and Partially Revised and Recirculated Draft EIR) quantifies emissions during Project operations as caused by heavy-duty truck trips. The quantification includes three components: off-site travel, on-site travel, and on-site idling. With respect to the incremental distance of off-site travel caused by diverting existing vehicles into the Project site, the travel forecasting by LAHD GMD considers the changes in travel patterns that could occur with the Proposed Project. The analysis from LAHD GMD considered changes in vehicle-miles traveled for detouring inbound and outbound Project trips between the Port terminals and the surrounding region and determined that the average potential change in vehicle miles traveled would be 1.87 miles per one-way trip. To conservatively determine the Project-related changes in vehicle miles traveled, the LAHD GMD analysis does not take credit for or quantify the benefit of reducing inefficient truck trips. The calculations supporting the LAHD GMD estimation appear in the administrative record (LAHD, 2023).

The Partially Revised and Recirculated Draft EIR reevaluated the internal circulation based on the preliminary site plan, the grade separation design, and potential need for

idling to arrive at greater levels of on-site emissions than shown in the Draft EIR. As a result, the severity of an existing significant, unavoidable impact (Impact AQ-3) in Section 3.1 (*Air Quality and Health Risk*) was increased, and a new potentially significant but mitigable impact (Impact GHG-1) in Section 3.3 (*Greenhouse Gas Emissions*) was identified in the Partially Revised and Recirculated Draft EIR. Two additional impacts (Impact AQ-4 and Impact AQ-5) in Section 3.1 (*Air Quality and Health Risk*) were revised to show the increased emissions, but impacts remain less than significant. Impact AQ-3 in the Final EIR Section 3.1.5 (*Impact Analysis*), has been revised to clarify the source of data used for travel forecasting and the change in truck trip lengths as a result of trip diversions. No additional analysis is needed.

See also Response to Comment CARB-2 regarding the numbers of trips.

Response to Comment CARB-5:

As described in Draft EIR Section 3.1 (*Air Quality and Health Risk*), Impact AQ-3, controlling truck technologies (such as requiring a phased transition to an all zero-emission drayage fleet) is not a feasible mitigation measure and furthermore, the Port does not have the legal authority to mandate a phased transition to an all zero-emission drayage fleet for the Project which would interfere with the price, route, and service of non-zero-emission trucks, and would likely be preempted by the Federal Aviation Administration Authorization Act (See 49 USC Section 14501, subd. (c)(1)).

Mandating the use of a particular technology in drayage service at a single facility is also legally and technically infeasible. Neither LAHD nor prospective tenant(s) would own or control the drayage trucks that would utilize the proposed maritime support facility (MSF). The Port acknowledges the availability of the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project; however, requiring and enforcing all third-party drayage truck operators to participate in this program would be outside the scope of the Proposed Project.

The CAAP acknowledges that trucks remain a significant source of air pollution and has committed the Ports to a goal of transitioning the drayage fleet to zero-emissions technologies by 2035. This is an aggressive goal and will require substantial effort and financial support by all parties involved – the ports, the regulatory agencies, the drayage industry, and the truck manufacturing industry – because the issue must be addressed on a port-wide basis, not a project-by-project basis. The CAAP requires the Ports to periodically review the deployment status of commercially available zero-emission trucks for drayage and charging infrastructure. As acknowledged in the most recent 2024 Update: Feasibility Assessment for Drayage Trucks, significant progress has occurred since 2018 with the commercialization of zero-emission drayage trucks and improved infrastructure for charging and refueling, but there is still a long way to go to achieve full market maturity and widespread adoption (San Pedro Bay Ports, 2025). Partially Revised and Recirculated Draft EIR Section 3.1.4 (*Impacts and Mitigation Measures*) notes that the statewide Advanced Clean Trucks and Advanced Clean Fleets regulations are not yet enforceable, and widespread adoption of zero-emissions technologies remains challenging in this regulatory context. The Final EIR also points out that PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would result in the incorporation of zero-emissions technologies into the Project's operational equipment by January 1, 2030, and modified those measures to provide more certainty in their implementation. The EIR also notes that tenants responsible for operations would not likely own or control the truck fleets of future

customers using the site. Therefore, the Proposed Project would not have control over the technology or composition of the truck fleet that would use the facility. No revisions are needed.

Response to Comment CARB-6:

The comment suggests additional project-specific mitigation for inclusion in the construction contracts and in tenant lease agreements. The Proposed Project construction emissions would not exceed applicable thresholds, and accordingly, the Draft EIR did not identify a need for mitigation of on-road heavy-duty trucks used during construction. Upon reviewing the recommendations, LAHD considered CARB's recommendation to require use of lower emitting haul trucks. The LAHD standard Site Construction Performance Requirements include provisions to require that on-road trucks used during construction meet or exceed CARB on-road vehicle emission requirements, and backup documentation requirements will be incorporated with construction contracts issued by LAHD. As part of a best management practice in Project approval, LAHD may also consider adding fleet modernization requirements; for example, requiring trucks used on site or to transport materials to and from the site to comply with 2015 emission standards, or newer, where available. Additional mitigation for construction phase emissions would not be necessary. Across all operations, the LAHD encourages restricting idling of heavy-duty vehicles, and this is a standard provision of tenant lease agreements. Although enforcement of specific idling limits is not feasible, terminals normally require engines to be turned off during roadability inspections (WBCT, 2025). No revisions to the EIR are needed.

Department of Toxic Substances Control

Comment Letter

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

October 22, 2025

Uriel de los Reyes
Environmental Specialist
Port of Los Angeles
425 S Palos Verdes Street
San Pedro, CA 90731
udelosreyes@portla.org

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE TERMINAL ISLAND MARITIME SUPPORT FACILITY PROJECT DATED SEPTEMBER 15, 2025, STATE CLEARINGHOUSE NUMBER 2023120181

Dear Uriel de los Reyes,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the Terminal Island Maritime Support Facility Project (Project). The proposed Project involves the development and operation of a chassis support facility on an approximately 89-acre site at 740 Terminal Way, San Pedro, CA 90731 at the Port of Los Angeles. The Project would construct and install office trailers, maintenance and repair facilities, chassis stalls, and appurtenant water and electrical infrastructure. The existing vacant Eldridge Street office building (750 Eldridge Street, San Pedro) would also be refurbished to support operations. DTSC recommends and requests consideration of the following comments:

1. The proposed Project is located in the vicinity of the former Long Beach Naval Complex (LBNC). Perfluoroalkyl and polyfluoroalkyl substance (PFAS) investigation is ongoing at the former LBNC. Substantial PFAS was detected in the groundwater below the former LBNC. Because fuel tank farm and storage were located at the Project site, testing for PFAS must be included in the Mitigating Measures section.

DTSC-1

2. In addition, Naval Air Base was located on Terminal Island. Based on the information available in EnviroStor, ordinance and explosive materials were stored in four separate buildings or sheds along the seaplane lagoon. The site also housed a machine-gun butt and skeet range. DTSC recommends performing additional research on the Naval Air Base boundaries in relation to the Project site. Although it is not anticipated that munitions, munitions debris, or other explosive hazards associated with the Naval Air Base site will be identified within the boundaries of the Project site, DTSC recommends performing additional research on the Formerly Used Defense Sites (FUDS) boundaries in relation to the Project site. Should a suspected military munition be encountered at the Project site: **DTSC-2**

    a. **Recognize** that munitions are dangerous;
    b. **Retreat** do not approach, touch, move or disturb it, but carefully leave the area; and,
    c. **Report** immediately what you saw and where you saw it to local law enforcement — call 911.

3. The Port of Los Angeles should prepare a health and safety plan for the construction workers protection; transport excavated excess soil for treatment and disposal at an appropriately permitted landfill and not transport soil to a residential development for reuse as fill material. **DTSC-3**

4. The Port of Los Angeles must follow DTSC advisory for testing imported fill material to prevent a new source of soil contamination. If previously not found underground storage tanks or discolored soil is encountered during grading activities, the Port of Los Angels must notify DTSC. All imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual. **DTSC-4**

   Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material there should be documentation of the origins of the soil/fill material and, if applicable, sampling be **DTSC-5**

conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

DTSC-5 (cont'd)

DTSC would like to thank you for the opportunity to comment on the DEIR for the Terminal Island Maritime Support Facility Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions regarding these comments, please contact us via our CEQA Review email.

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
state.clearinghouse@lci.ca.gov

Lisa Blewitt
Project Manager / Consulting Firm
Aspen Environmental Group
lblewitt@aspeneg.com

Irena Edwards
Environmental Scientist
SMRP – Cleanup - Cypress
Department of Toxic Substances Control
Irena.Edwards@dtsc.ca.gov

Christie Bautista
Senior Environmental Scientist (Supervisor)
SMRP – Cleanup - Cypress
Department of Toxic Substances Control
Christie.Bautista1@dtsc.ca.gov

Uriel Reveles
Engineering Geologist
SMRP – Cleanup – Chatsworth
Department of Toxic Substances Control
Uriel.Reveles@dtsc.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

Responses

Response to Comment DTSC-1:

The commenter notes that the Project site is near the former Long Beach Naval Complex (LBNC), where an ongoing investigation has detected perfluoroalkyl and polyfluoroalkyl substance (PFAS) in groundwater at the former LBNC. The commenter states that given the historical presence of fuel storage and tank farms at the Project site, PFAS testing should be included in the mitigation measures section of the Final EIR.

The Port would conduct PFAS testing at the Project site in accordance with DTSC's comment. MM HAZ-1 has been revised to specify PFAS testing as part of its requirements for characterization of soil, soil vapor, and groundwater contamination within the Project site.

Response to Comment DTSC-2:

The commenter notes that the Naval Air Base was located on Terminal Island and that EnviroStor indicates the presence of ordnance and explosive materials. The commenter requests additional research to confirm the boundaries of the Naval Air Base in relation to the Project site. The commenter notes that munitions or explosive hazards are not expected on the Project site but recommends further research on the Formerly Used Defense Sites (FUDS) boundaries relative to the Project site. The commenter requests that procedures be in place in the event a suspected military munition is encountered during Project activities and includes specific recommended procedures.

Draft EIR Section 3.4.2 (*Environmental Setting*) states that the Naval Air Base is mapped within the Project site and covers the Project area. The Final EIR has been updated to include additional information regarding the FUDS boundaries in relation to the Project site, specifically Naval Air Base and the Former Long Beach Naval Complex. The Port is not aware of any ordnance or explosive materials at the Project site; however, the Final EIR has been updated to include procedures to follow if such materials are encountered.

Additionally, the Final EIR has been revised to incorporate information from the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Five-Year Review regarding environmental cleanup activities at the Former LBNC located approximately 1,200 feet east of the eastern boundary of the Project site.

Response to Comment DTSC-3:

The commenter requests a health and safety plan for construction workers and proper treatment and disposal of excavated soil at permitted facilities, with no reuse for residential purposes.

Construction bid specifications for Port projects include a requirement for a health and safety plan. The Final EIR has been updated to state that the Project's bid specifications would require a health and safety plan and appropriate disposal of the excavated soil with no reuse for residential purposes.

Response to Comment DTSC-4:

The commenter requests that POLA follow DTSC guidance for testing imported fill to prevent introducing contaminated soil. The commenter requests that DTSC be notified if unknown underground storage tanks or discolored soil are found during grading. The

commenter states that all imported fill should be tested for contaminants per DTSC's *Clean Imported Fill Material Fact Sheet* (DTSC, 2001) and *Preliminary Endangerment Assessment Guidance Manual* (DTSC, 2015). The commenter states that the Port should document the origin of all imported soil and conduct sampling based on the source and prior land use to ensure suitability.

The Proposed Project and alternatives do not include importing fill material to the site. The Final EIR has been updated to clarify that the Project would comply with both LAHD's Import Fill Guidance, which is based on DTSC's Information Advisory Clean Imported Fill Material Fact Sheet (DTSC, 2001), and the screening level requirements of DTSC's Preliminary Endangerment Assessment Guidance Manual (DTSC, 2015). The Final EIR has also been updated to state that LAHD would notify DTSC immediately if previously unknown underground storage tanks, discolored soil, or other indications of potential contamination are encountered during grading or excavation activities.

Response to Comment DTSC-5:

As discussed in Response to Comment DTSC-4, the Proposed Project would not involve the import of fill material.

South Coast Air Quality Management District

Comment Letter

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
ceqacomments@portla.org
udelosreyes@portla.org
Uriel de los Reyes, Environmental Specialist
Los Angeles Harbor Department
425 S. Palos Verdes Street
San Pedro, CA 90731

October 30, 2025

Draft Environmental Impact Report (EIR) for the Proposed Terminal Island Maritime Support Facility Project (Proposed Project) (SCH No.: 2023120181)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles Harbor Department is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project involves the improvement and expansion of approximately 89.2 acres, including approximately 73 acres of chassis/empty wheeled container storage that could potentially be used by 12 container terminals located in the Ports of Los Angeles and Long Beach.[1] Specifically, the Proposed Project would construct and install up to two office/welfare buildings, four canopy structures, eight restrooms, eight guard booths, maintenance and repair facilities, chassis stalls, appurtenant water and electrical infrastructure, and refurbish the existing vacant Eldridge Street office building.[2] The Proposed Project is located at 740 Terminal Way in San Pedro.[3] The land use designation of the site is proposed to be changed to a dual designation of Container and Maritime Support via a Port Master Plan amendment.[4] Based on a review of an aerial photograph, the nearest sensitive receptors (e.g., residences) are approximately 1.3 miles west of the Proposed Project site. Construction would occur over 24 months, and operation would commence in 2027.[5]

[1] Draft EIR. p. 2-1.
[2] *Ibid.* p. 2-2.
[3] *Ibid.* p. 2-3.
[4] *Ibid.* p. 2-5.
[5] *Ibid.* p. 2-11.

-1-

Uriel de los Reyes, Environmental Specialist October 30, 2025

South Coast AQMD Comments

Export Information During Construction

SCAQMD-1

Section 3.1 (Air Quality and Health Risk) of the Draft EIR states that approximately 270,000 cubic yards of soil would be exported from the site during the grading phase.[6] However, the Draft EIR does not identify the specific disposal facility or landfill designated to receive the exported soil, nor does it specify the haul distance between the site and the disposal location. In the California Emissions Estimator Model (CalEEMod) analysis, a default one-way haul distance of 20 miles was assumed. Should the actual disposal site be located at a greater distance from the site, the current modeling analysis may have underestimated the criteria air pollutants and greenhouse gas emissions associated with material hauling. To improve the accuracy of the emission estimates, the Lead Agency is recommended to identify the anticipated disposal site(s), quantify the actual haul distance(s), and revise the CalEEMod[7] assumptions to reflect project-specific conditions in the Final EIR.

Potentially Underestimated Construction Emissions

SCAQMD-2

Chapter 2 (Project Description) of the Draft EIR acknowledges that soil and groundwater at the site are known to contain contamination at varying levels, and that due to the extent of proposed ground improvement activities, it is likely that contamination would be encountered during construction.[8] In addition, Section 3.4 (Hazards and Hazardous Materials) references prior environmental investigations identifying elevated concentrations of total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), polycyclic aromatic hydrocarbons (PAH), and pesticides in soil, as well as TPH, arsenic, copper, nickel, and polychlorinated biphenyls (PCB) in groundwater, exceeding applicable regulatory screening levels at the time of assessment.[9]

While Mitigation Measure (MM) HAZ-1 proposes pre-construction soil and groundwater sampling and analysis to characterize the nature and extent of the contamination,[10] the Draft EIR does not provide an evaluation of potential air quality impacts associated with the cleanup/remediation activities, including the potential emissions of fugitive dust, VOC, and other hazardous air pollutants that may be released during disturbance, excavation, or treatment of contaminated materials. Due to the potential presence of contaminated soils, the Lead Agency is recommended to review and ensure compliance with all applicable requirements of South Coast AQMD Rule 1166 — Volatile Organic Compound Emissions from Decontamination of Soil[11] and Rule 1466 — Control of Particulate Emissions from Soils with Toxic Air Contaminants,[12] during all soil disturbance, handling, and remediation activities. Compliance with these rules will ensure that potential emissions of VOC and toxic particulates are minimized and appropriately controlled in accordance with South Coast AQMD regulations.

[6] *Ibid.* p. 3.1-15.
[7] CalEEMod free of charge available at https://www.caleemod.com/
[8] *Ibid.* p. 2-10.
[9] *Ibid.* p. 3.4-17.
[10] *Ibid.* p. 3.4-17.
[11] South Coast AQMD, Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[12] South Coast AQMD, Rule 1466 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf

Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup/remediation activities. Additionally, the cleanup/remediation activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Based on the emission calculations from the CalEEMod detailed report, a one-way truck trip length of 20 miles was relied upon to quantify the construction emissions from hauling activities. If the cleanup/remediation activities include the removal and disposal of contaminated soil, depending on the type of contamination, contaminated soil may need to be transported to a permitted hazardous waste disposal facility located outside Los Angeles County, which could require a one-way trip that would have a substantially greater travel distance beyond 20 miles. **SCAQMD-3**

To ensure an accurate quantification of construction-related emissions, including the cleanup activities, particularly for regional criteria pollutants and greenhouse gases, the Lead Agency is recommended to revise the CalEEMod model inputs to reflect the actual distance to a specified permitted hazardous waste disposal facility. The selected trip length should be clearly disclosed and explained in the Final EIR. Should the Lead Agency elect not to revise the 20-mile haul distance, a detailed rationale supported by substantial evidence in the administrative record must be provided to demonstrate the appropriateness of the assumption in the context of the project-specific conditions.

Inappropriate Use of South Coast AQMD's Mass Rate Localized Significance Threshold Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact **SCAQMD-4**

The analysis of localized significance thresholds (LSTs) in the Draft EIR appears to inappropriately rely on the South Coast AQMD LST screening tables to assess localized air quality impacts associated with both construction and operational activities. However, as outlined in Table 3-2 of the South Coast AQMD Final LST Methodology guidance,[13] the screening tables are not intended for projects with a disturbed area exceeding five acres. Given that the Proposed Project encompasses approximately 89.2 acres, the reliance on the screening tables is inappropriate because the localized pollutant concentrations are likely underestimated.

To ensure an accurate and technically robust assessment of potential localized air quality impacts, the Lead Agency is recommended to: 1) conduct project-specific air dispersion modeling, which quantifies the concentrations of criteria pollutants at sensitive receptor locations during both the construction and operational phases; and 2) incorporate the results into the Final EIR.

Truck Idling Duration and Emissions Modeling **SCAQMD-5**

According to the technical file provided by the Lead Agency labeled *AQ GHG Appendix v250908*, an assumption of nine minutes of idling per truck per day was used to estimate diesel particulate matter (DPM) emissions for the health risk assessment (HRA).[14] The application of the nine-minute idling duration contains a reference in the Draft EIR that this assumption is consistent with the Port of Los Angeles Inventory of Air Emissions for Calendar Year 2017. However, in light of

[13] South Coast AQMD's Final LST Methodology available at https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf
[14] Provided Technical File labeled as _AQ GHG Appendix v250908.

the increased activities and truck volumes at the Port of Los Angeles over the past eight years, the actual idling times may be longer in duration since the Proposed Project is anticipated to involve 3,682 and 6,838 diverted truck trips per day in the opening year 2027 and buildout 2046, respectively.[15] Moreover, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, among other factors, particularly during peak hours or in congested circulation areas. As such, a nine-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

SCAQMD-5 (cont'd)

While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard, which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as "clean idle" certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.[16] Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.[17] For these aforementioned reasons, as a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the HRA may have substantially underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated onsite heavy-duty truck activities.

Accurate characterization of idling activity is essential to fully assess the potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides an accurate and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the nine-minute assumption as representative of expected operations of the Proposed Project.

Emission Rate Calculations Used in Health Risk Assessment Modeling

SCAQMD-6

Section 3.1 (Air Quality and Health Risk) of the Draft EIR states that on-site construction-related DPM emissions are estimated to average 0.11 ton per year (tpy) over the 24-month construction period. For operational activities, DPM emissions are projected to be approximately 0.09 tpy in the opening year, 2027.[18]

[15] *Ibid.* p. 3.1-17.
[16] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf
[17] CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., available at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf
[18] *Ibid.* p. 3.1-20.

However, a review of the supporting documentation provided by the Lead Agency, specifically, the technical file titled *AQ GHG Appendix v250908*, reveals methodological inconsistencies in the estimation of DPM emissions for both construction and operational phases. Notably, operational-year emissions were derived by converting maximum daily emissions in pounds per day (lb/day) to annualized values, whereas construction-phase emissions were calculated as a multi-year average. This inconsistent approach may compromise the comparability and accuracy of the emission estimates used in the HRA. **SCAQMD-6 (cont'd)**

Furthermore, the Draft EIR states that "the Proposed Project was assumed to permanently increase on-site DPM emissions by up to 0.11 tpy, rather than limiting this level of emissions to the 24-month construction period.[19]" This assumption leads to the use of averaged annual emissions in the HRA, rather than modeling based on peak or maximum exposure values, which may underestimate potential health risks to nearby sensitive receptors.

Given these discrepancies, the Lead Agency is recommended to: 1) apply and clearly state a consistent and technically supported methodology for calculating DPM emissions across all phases of the Proposed Project; 2) revise the HRA modeling accordingly; and 3) disclose the updated emission estimates and associated HRA results in the Final EIR.

Outdated Meteorological Data in the HRA Modeling **SCAQMD-7**

Section 3.1 (Air Quality and Health Risk) of the Draft EIR indicates that the worst-case ambient downwind concentrations are estimated in the HRA analysis by applying a five-year record from 2012 to 2016 of modeled-ready meteorological data from Long Beach Airport (KLGB).[20] In addition, based on the technical files provided by the Lead Agency, the MET data used in modeling is the KLGB version 9.

It should be noted that this data corresponds to Version 9 of South Coast AQMD's AERMOD-ready MET dataset, which is no longer available or recommended for use. South Coast AQMD released an updated version of AERMOD-ready meteorological data (Version 11) in October 2024.[21] This updated dataset was developed using the U.S. EPA's AERMET processor (Version 22112), along with AERMINUTE (Version 15272) and AERSURFACE (Version 20060), and reflects current regulatory guidance and processing methodologies.

To ensure technical accuracy, transparency, and consistency with the current South Coast AQMD recommendations, the Lead Agency is recommended to:

- Reassess the selection of meteorological data using the latest Version 11 dataset;
- Revise the HRA modeling inputs accordingly; and
- Include updated air quality modeling results in the Final EIR

This approach will ensure that air dispersion modeling is based on the most recent and appropriate meteorological data, thereby supporting a robust and defensible environmental analysis.

[19] *Ibid.* p. 3.1-21.
[20] *Ibid.*
[21] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html

SCAQMD-8

Unsupported Truck Trip Distance On and Off-site

Section 3.1 (Air Quality and Health Risk) of the Draft EIR indicates that diverted truck trips associated with the Proposed Project may involve up to 1.87 additional miles per one-way trip to access the site and approximately 0.35 miles of each one-way trip will occur on-site.[22] According to the technical file provided by the Lead Agency, the 1.87-mile estimate is based on the "Port of Los Angeles Goods Movement Division, spreadsheet 20230112," while the 0.35-mile estimate is described as "from gate to extent of site." However, the Draft EIR did not include: 1) the referenced spreadsheet or other supporting documentation to explain how these trip length assumptions were derived; 2) a clear description of the route methodology; 3) assumptions about vehicle travel patterns; 4) supporting explanation for how these distances reflect actual operational conditions for truck trips; and 5) a traffic analysis.

Given the importance of the truck trip lengths when quantifying criteria pollutant emissions, toxic air contaminant exposure, and associated health risks (e.g., DPM impacts) from the Proposed Project, it is imperative that the analysis be supported by transparent and verifiable data. Without detailed documentation or substantial evidence to support these input values, the air quality analysis and HRA may be inaccurate by underestimating emissions from the Proposed Project.

In addition, construction of the Vincent Thomas Bridge Deck Replacement Project (SCH No. 2023040301) is anticipated to commence in late 2025, with the bridge closure scheduled for fall 2026 and its reopening before the 2028 Olympic Games.[23] Given that the bridge closure period overlaps with the anticipated construction schedule of the Proposed Project, it is reasonable to expect temporary detours, delays, and associated increases in traffic volumes along alternate routes. Consequently, the assumed off-site travel distance of 1.87 miles may not accurately represent actual travel conditions or vehicle activities during the construction period, potentially underestimating the associated air quality emission estimates. Such changes in travel behavior and roadway utilization result in an increase of estimated emissions of criteria air pollutants and greenhouse gases associated with construction worker commutes, material and export hauling, equipment transport, etc. Therefore, the air quality analysis should include a scenario that analyzes this potential variability in off-site travel patterns due to regional construction activities to more accurately characterize potential emissions under modified traffic conditions.

To ensure compliance with CEQA requirements for disclosure and substantiation of assumptions used in impact analyses, the Lead Agency is recommended to provide the following in the Final EIR:

- A detailed explanation of the methodology used to calculate the 1.87-mile and 0.35-mile truck trip distances, including all assumptions, data sources, and any applicable traffic modeling or routing considerations.
- Inclusion of the referenced spreadsheet or relevant excerpts demonstrating how the trip distances were derived.
- A revision, as necessary, of the truck trip distance assumptions to account for potential detours and rerouting associated with the Vincent Thomas Bridge closure, ensuring that

[22] *Ibid.* p. 3.1-17.
[23] Vincent Thomas Bridge Deck Replacement Project available at https://dot.ca.gov/caltrans-near-me/district-7/district-7-projects/d7-vincent-thomas-bridge-bridge-deck-replacement

modeled trip lengths reflect reasonably foreseeable travel conditions during concurrent regional construction activities.

- A discussion of how the assumed trip lengths reflect realistic operational conditions, accounting for potential variability in truck origin-destination patterns, roadway access constraints, and on-site circulation characteristics.

SCAQMD-8 (cont'd)

Providing this information in the Final EIR will enhance the transparency and robustness of the air quality analysis and ensure that the conclusions reached are supported by substantial evidence, as required under CEQA.

SCAQMD-9

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, in addition to the Project Feature PF AQ-1 (Zero-Emissions Operational Equipment) and Mitigation Measure MM AQ-1 (Zero-Emission Cargo-Handling Equipment), the following mitigation measures and project design considerations are recommended to be incorporated into the Final EIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

   Note: Given CARB's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available for use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.
   Note: South Coast AQMD staff are available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation Measures to Reduce Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

SCAQMD-9 (cont'd)

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors, and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

SCAQMD-10

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[24]
2. South Coast AQMD 2022 Air Quality Management Plan,[25] specifically:

   a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures

   b) Appendix IV-B – CARB's Strategy for South Coast

   c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change.[26]

[24] State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act available at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[25] South Coast AQMD, 2022 Air Quality Management Plan (AQMP) available at http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan
[26] United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change available at https://www.epa.gov/transportation-air-pollution-and-climate-change

Information on the CERP for the Designated AB 617 WCWLB Community

SCAQMD-11

The Proposed Project is located within the AB 617-designated Wilmington, Carson, and West Long Beach (WCWLB) community, which is heavily impacted by air pollution generated from sources such as ports, refineries, the oil and gas industry, heavy-duty diesel trucks, warehouses, and railroad activities. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a Community Emission Reduction Plan (CERP) that identifies air quality priorities and related actions to reduce air pollution in the community. The South Coast AQMD Governing Board adopted the WCWLB CERP on September 6, 2019.[27] The Lead Agency is recommended to review the air quality priorities and related actions in Chapter 5 of the WCWLB CERP in order to reduce air pollution in this community. The Lead Agency is also recommended to continue working with the South Coast AQMD to explore whether additional measures to mitigate or further reduce emissions can be implemented at the site.

Potential Cooperative Agreement with the Ports of Long Beach and Los Angeles

SCAQMD-12

The Lead Agency is also encouraged to review the *Proposed Draft Cooperative Agreement Between South Coast AQMD and the Ports of Long Beach and Los Angeles* (October 10, 2025) for guidance on potential strategies, mitigation measures, and commitments to reduce emissions. Information and related materials on the potential cooperative agreement are available at: https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/facility-based-mobile-source-measures/comm-ports-wkng-grp/potential-cooperative-agreement-with-the-ports-of-long-beach-and-los-angeles. The South Coast AQMD Governing Board is scheduled to consider this item at its Public Hearing on November 7, 2025. The agenda item may be accessed 72 hours prior to the Public Hearing at: https://www.aqmd.gov/home/news-events/meeting-agendas-minutes.

South Coast AQMD Air Permits and Role as a Responsible Agency

SCAQMD-13

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[28] Rule 203 – Permit to Operate,[29] Rule 401 – Visible Emissions,[30] Rule 402 – Nuisance,[31] Rule 403 – Fugitive Dust,[32] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[33] Rule 1113 – Architectural Coatings,[34] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[35]

[27] South Coast AQMD. September 2019. Assembly Bill 617 Wilmington, West Long Beach, Carson Community Emissions Reduction Plan. Accessed at: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf.
[28] South Coast AQMD, Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[29] South Coast AQMD, Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[30] South Coast AQMD, Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[31] South Coast AQMD, Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[32] South Coast AQMD, Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[33] South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[34] South Coast AQMD, Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[35] South Coast AQMD, Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf

Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[36] and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[37] etc. **SCAQMD-13 (cont'd)**

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

Conclusion **SCAQMD-14**

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter,

[36] South Coast AQMD, Rule 1466 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[37] South Coast AQMD, Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

SCAQMD-14 (cont'd)

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

BR:SW:DN
LAC250916-01
Control Number

Responses

Response to Comment SCAQMD-1:

The air pollutant and GHG emissions estimates for the construction phase were revised and updated in the Partially Revised and Recirculated Draft EIR to reflect soil exports occurring over an average distance of 80 miles per one-way trip. See Response to Comment CARB-3.

Response to Comment SCAQMD-2:

The Draft EIR recognized that soil contamination exists at varying degrees and handling, managing, and transport of soil would depend on additional site characterization, including pre-construction soil and groundwater sampling and analysis required by mitigation measure (MM) HAZ-1. Depending on the outcome of this analysis, the construction contractor would be required to adhere to all applicable soil treatment, reuse, and/or disposal standards, the Project-specific Soil Management Plan (Final EIR Appendix D), and the Project-specific health and safety plan. See Response to Comment DTSC-3.

The Partially Revised and Recirculated Draft EIR included clarifications to indicate the potential applicability of SCAQMD rules governing volatile organic and toxic contaminants in contaminated soils to ensure that potential emissions of VOC and toxic particulates are minimized and controlled. See Final EIR Section 3.1 (*Air Quality and Health Risk*). No additional revisions to the EIR (Draft EIR and Partially Revised and Recirculated Draft EIR) are required.

Response to Comment SCAQMD-3:

The Draft EIR recognizes that soil contamination exists at varying degrees. Excavation activities and export of soil are included in the site preparation and grading phases, which include emissions estimates for off-road diesel-powered equipment and on-highway haul trucks for material handling. The Partially Revised and Recirculated Draft EIR revised quantification of construction phase emissions to reflect the potential for soil exports to travel an average distance of 80 miles per one-way trip. See Final EIR Section 3.1 (*Air Quality and Health Risk*). See Response to Comment CARB-3.

Response to Comment SCAQMD-4:

While LST screening tables are not intended for projects with disturbed areas exceeding five acres, the EIR (Draft EIR and Partially Revised and Recirculated Draft EIR) analysis points to the reference guidance for the screening tables and compares all Project emissions to the mass rate thresholds in the look-up tables. All emissions from across the entire site and also off-site emissions are summed for the Project's mass rates shown in Final EIR Table 3.1-6 and Table 3.1-8 (Impact AQ-2 and Impact AQ-4). This approach results in overestimating the localized impacts as follows. The LST screening tables are based on pollutants being emitted into a relatively small five-acre airspace, when in fact Project emissions would be widely dispersed at the larger Project site. Because the proposed Project would emit into the larger airspace of the site, downwind Project concentrations would be more diluted and lower than those that make the basis for the mass rate LST screening look-up tables. For toxic air contaminants (Impact AQ-5), the dispersion modeling is based on DPM being emitted across the area of the site. Given that

the criteria pollutant analysis utilizing the LST tables falls below the emissions thresholds, no additional analysis is needed.

Response to Comment SCAQMD-5:

As noted, truck idling may vary across the truck fleet depending on on-site queuing, security checks, staging, loading, and unloading operations, among other factors. The 2025 Draft EIR recognized the current CARB five-minute limitation on diesel truck idling and included nine minutes per visit to quantify these emissions in a manner consistent with prior studies for the Port. The Partially Revised and Recirculated Draft EIR revised this idling assumption upward to approximately 20 minutes per visit based on the existing maximum "time on terminal" documented for similar chassis yards, which are non-container terminal operations in the port-wide inventory (POLA, 2025). Recent years of emissions inventories and methodology reports use "low idle" emission factors and indicate that recent model year distributions of trucks at San Pedro Bay Ports have not included trucks older than model year 2007 (San Pedro Bay Ports, 2025). The updated idling assumptions are reflected in the Partially Revised and Recirculated Draft EIR Appendix B1, and in Section 3.1 (*Air Quality and Health Risk*). These revisions are also captured in this Final EIR. The severity of an existing significant, unavoidable impact (Impact AQ-3) in Section 3.1 (*Air Quality and Health Risk*) was increased, and a new potentially significant but mitigable impact (Impact GHG-1) in Section 3.3 (*Greenhouse Gas Emissions*) was identified in the Partially Revised and Recirculated Draft EIR. Two additional impacts (Impact AQ-4 and Impact AQ-5) in Section 3.1 (*Air Quality and Health Risk*) were identified as having increased emissions, but impacts remained less than significant. These updated results, as well as the associated updated significance conclusions, were presented in the Partially Revised and Recirculated Draft EIR and are reflected in Section 3.1 (*Air Quality and Health Risk*) and Section 3.3 (*Greenhouse Gas Emissions*) of this Final EIR. No additional analysis is needed.

Response to Comment SCAQMD-6:

As appropriate for a screening-level analysis, the Draft EIR included certain assumptions to ensure that potential health risks were overpredicted. In this case, the average annual rate of on-site DPM emissions during construction was found to be greater than the annual rate of DPM during operational years. The Partially Revised and Recirculated Draft EIR included updated screening of health risks by separating the different years of construction and operation. The results were reflected in Section 3.1 (*Air Quality and Health Risk*) and Partially Revised and Recirculated Draft EIR Appendix B2, Health Risk Assessment. These revisions are also captured in this Final EIR (Impact AQ-5).

Because this Final EIR includes revisions to construction-phase emissions (for exporting soil) and also revisions to operational emissions for clarifying the anticipated onsite travel and idling, the HRA has been revised. See Final EIR Section 3.1 (*Air Quality and Health Risk*).

Response to Comment SCAQMD-7:

As mentioned, the SCAQMD issued a revised edition of AERMOD-compatible meteorological data in October 2024. This occurred after completion of the proposed Project analysis by LAHD for the Draft EIR.

LAHD notes that the dispersion modeling in the Draft EIR was performed in early 2024 using the most recent publicly available versions of AERMOD (version 23132) and

SCAQMD's meteorological data, as they were at that time. The Draft EIR used the SCAQMD's meteorological data from the Long Beach Airport. The Partially Revised and Recirculated Draft EIR revised the dispersion modeling for downwind DPM concentrations to use AERMOD-ready data, compiled from actual hourly observations collected from January 1, 2012 through December 31, 2016, at the Wilmington Community Station (WCS) at Saints Peter and Paul School. This meteorological data set was processed by the Port in 2018 using the most recent version of AERMET at the time, version 16216.

The WCS is part of the Port's site-specific monitoring network and is located about 2.1 miles north of the Project site. It is considered the most representative meteorological station for the Project, in accordance with the "Sphere of Influence" analysis conducted by POLA and POLB as part of the Bay-Wide Regional Human Health Risk Assessment supporting the 2010 Update to the Clean Air Action Plan (San Pedro Bay Ports, 2010). The purpose of the "Sphere of Influence" analysis was to fully characterize the varying conditions found in different areas of the Ports' operations. The study evaluated over 15 meteorological stations (including stations processed by the SCAQMD for use in AERMOD) located within a 20-kilometer radius of the Ports and investigated several selection criteria, including the influence of geographic features on prevailing wind patterns to determine representativeness of the surface meteorological stations. Based on the results of that analysis, the WCS was recommended for projects in the inner harbor area for CEQA purposes; the same station has been used for other Port projects in the same area in past EIRs.

The USEPA's Guideline on Air Quality Models does not set an age limit on meteorological data used in dispersion modeling (published as Appendix W of 40 CFR Part 51). Rather, the guideline places the most emphasis on geographical representativeness and data completeness, both of which are satisfied by the 2012-2016 WCS data set. Because the collection, validation, missing data handling, and AERMET processing tasks are rigorous, agencies typically don't re-process meteorological data every time a new year of data is collected or a new version of AERMET is released. For example, the SCAQMD re-processes meteorological data for use in AERMOD approximately every five years even though AERMET is often updated more frequently. Similarly, the Port also periodically updates its meteorological data sets and is currently in the planning stage for a new update.

The Partially Revised and Recirculated Draft EIR updated the modeling for the Proposed Project to use the most recent and representative AERMOD-ready meteorological data set from the WCS. Although the AERMET meteorological data processor has been updated since 2016, the AERMET updates included various enhancements, bug fixes, and minor corrections but did not include substantial changes to the main meteorological data processing algorithms. As a result, the Port expects that the 2012-2016 WCS meteorological data set and resulting health risk results would not change substantially if the same meteorological data were re-processed with the most recent version of AERMET.

Because the WCS is the most representative geographically, LAHD has revised the dispersion modeling and health risk analysis to use meteorological data from WCS and the updated release of AERMOD (version 24142). See Final EIR Section 3.1 (*Air Quality and Health Risk*) and Final EIR Appendix B1.

Response to Comment SCAQMD-8:

The Partially Revised and Recirculated Draft EIR quantifies emissions during Proposed Project operations including those associated with heavy-duty truck trips traveling offsite and onsite. See Response to Comment CARB-2 regarding the numbers of truck trips and Response to Comment CARB-4 regarding the basis for the length of diverted trips for off-site travel distances.

The typical truck travel distance on site was included in the Draft EIR based on a preliminary review of the site plan and dimensions of the site. The one-way average travel length on site represents a typical segment of travel between the chassis stalls, roughly in center of the parking area within the loop, and the Ferry Street/Terminal Way intersection. The Partially Revised and Recirculated Draft EIR included a reevaluation of the site plan and the distance of travel over the new grade separation (Figure 2-3, Project Site Plan), the typical on-site circulation was found to be greater than shown in the Draft EIR. The Partially Revised and Recirculated Draft EIR included revisions to clarify the basis for on-site travel distances and to account for additional on-site emissions. The revisions include updated quantification of criteria air pollutants, DPM, and GHG. See also Final EIR Section 3.1 (*Air Quality and Health Risk*).

Planning for the future Vincent Thomas Bridge Deck Replacement and other temporary detours or traffic delays would be accommodated through traffic management. As construction of the Proposed Project is likely to overlap with the Vincent Thomas Bridge Deck Replacement Project, LAHD shall perform all necessary coordination with Caltrans. LAHD has been coordinating closely with Caltrans (including issuance of permits to Caltrans) on their traffic management plan for the planned closure of the Vincent Thomas Bridge from 2026 to 2029. No additional analysis is necessary.

Response to Comment SCAQMD-9:

A range of mitigation measures to reduce operational air quality impacts from mobile sources related to drayage truck technologies and infrastructure are presented by SCAQMD. LAHD has considered these recommendations; however, none were determined to be feasible. For example, LAHD considered and rejected the recommendation to limit the daily number of trucks allowed at the facility. Neither LAHD nor prospective tenant(s) would own or control the drayage trucks used by the that would utilize the proposed MSF, and the facility would be placed at a severe competitive disadvantage if forced to turn away vehicles. Similarly, the Port does not have the legal authority to require specific engine technologies or mandate a phased transition to an all zero-emission drayage fleet for the Project. These recommendations would be infeasible as they would interfere with the price, route, and service of non-zero-emission trucks. The Proposed Project would include the necessary charging infrastructure.

See Response to Comment CARB-5 regarding phase-in of cleaner operating trucks, and CARB-6 regarding additional limitations on idling.

Response to Comment SCAQMD-10:

Various statewide and regional documents providing potential mitigation measure options designed to manage air quality impacts from transportation-related activities and mobile sources in general are recommended by SCAQMD for consideration, including the SCAQMD 2022 AQMP.

The Draft EIR's analysis for consistency with the 2022 AQMP under Impact AQ-6 includes a discussion of the various control measures related to ports, including measures to deploy zero-emission and low NOx technologies for trucks and cargo-handling equipment. The analysis concludes that the Proposed Project would not conflict with or obstruct implementation of the 2022 AQMP control measures.

The LAHD notes that the 2022 AQMP is a regional, programmatic document that does not specifically incorporate or mention each and every project in the region. Instead, the SCAQMD relies on growth and activity forecasts provided by local entities, including the Port of Los Angeles, to develop its forecasts of future regional emissions, necessary emissions reductions, and general strategies to achieve those reductions. The LAHD provides its forecasts of anticipated cargo growth and activity levels from all Port terminals, including the Proposed Project, to the Southern California Association of Governments (SCAG), which in turn provides them to SCAQMD via the Regional Transportation Plan. The SCAQMD, employing its own modeling tools and assumptions, uses those forecasts to develop the AQMP. No additional analysis is necessary.

Response to Comment SCAQMD-11:

While SCAQMD recommends a review of the air quality priorities and related actions within Chapter 5 of the CERP, the Draft EIR included a review of Chapter 5c: Ports of the September 2019 Final CERP (SCAQMD, 2019) and concluded that the Proposed Project would not conflict with the CERP (page 3.1-24).

See also Response to Comment CARB-1. No additional analysis is necessary.

Response to Comment SCAQMD-12:

The comment encourages a review of the *Proposed Draft Cooperative Agreement*. No additional analysis is necessary.

Response to Comment SCAQMD-13:

SCAQMD has identified the possibility of new stationary and portable sources, including emergency generators, fire water pumps, or boilers, that may trigger air permitting requirements. If air permits from the SCAQMD are required for the Proposed Project, the role of SCAQMD under CEQA will be as a Responsible Agency. The Project Description (Draft EIR Table 2-1) identifies this responsibility of the SCAQMD. However, the Proposed Project does not include any stationary sources or portable equipment that would require SCAQMD air permits.

The comment indicates certain SCAQMD rules could become applicable depending on the leaseholder activities or the handling and treatment of contaminated soils. The Final EIR includes revisions to clarify the scope of rules governing these types of sources. See Final EIR Section 3.1 (*Air Quality and Health Risk*).

Response to Comment SCAQMD-14:

As required by State CEQA Guidelines Section 15088 (a-b), LAHD will provide responses to SCAQMD's comments at least 10 days prior to certification of the Final EIR. Detailed reasons supported by substantial evidence have been provided in the above responses to comments.

10.4. Organizations

American Soybean Association

Comment Letter

February 20, 2026

Lisa Wunder
Director of Environmental Management
Lost Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, CA 90731

Comments submitted electronically via: ceqacomments@portla.org

Re: Port of Los Angeles Comments on the Revised and Recirculated Draft Environmental Impact Report (RDEIR) - Terminal Island Maritime Support Facility Project

Dear Director Wunder:

The following comments from the American Soybean Association (ASA) are submitted in response to the Partially Revised and Recirculated Draft Environmental Impact Report (RDEIR) for the proposed Terminal Island Maritime Support Facility Project. ASA represents approximately 500,000 U.S. soybean farmers on domestic and international policy issues important to the soybean industry and has 26 affiliated state associations representing 30 soybean-producing states. U.S. soybean growers have long been committed to producing the world's food, feed, fuel, and thousands of bioproducts in a sustainable and climate-smart way.

ASA recognizes that communities near California's ports, many of which are disadvantaged, continue to experience disproportionate public health burdens from emissions such as nitrogen oxides (NOx), particulate matter (PM), reactive organic gases (ROG), and greenhouse gases (GHGs). Addressing emissions is therefore essential to improving air quality, meeting state and federal air quality standards, and achieving California's climate goals. ASA supports the Port's efforts to reduce greenhouse gas and criteria pollutant emissions from freight operations.

As the Port evaluates feasible pathways to achieve these reductions, we recommend that the Final Environmental Impact Review (EIR) acknowledge the role that low-carbon liquid fuels, including soy-based biodiesel and renewable diesel, can play as complementary emissions-reduction technologies alongside zero-emission equipment. These fuels are commercially available today, require no new vehicle turnover, and are recognized under state and federal clean fuel programs for delivering meaningful lifecycle greenhouse gas reductions. Maintaining a technology-neutral framework will help ensure the Port can deploy the full suite of solutions needed to achieve near- and long-term climate goals while improving operational and logistical throughput. **ASA-1**

Finally, recognizing the role of U.S. agriculture in decarbonizing transportation fuels offers a pathway that balances environmental integrity with economic opportunity. With thoughtful project implementation, the Port of LA can lead the way in promoting clean fuels while supporting U.S. farmers and the rest of the value chain. We appreciate the Port of LA's leadership and look forward to continued engagement in the future.

Sincerely,

Scott Metzger
President, American Soybean Association

Responses

Response to Comment ASA-1

The comment pertains to use of low carbon liquid transportation fuels, including soy-based biodiesel and renewable diesel, as a means of achieving GHG emissions reductions. The proposed facility and facility users would use California fuels that are subject to the Low Carbon Fuel Standard regulations, as noted in Final EIR Section 3.3, *Greenhouse Gas Emissions*, Table 3.3-4. No further discussion is necessary.

Appendix A

Notice of Preparation/Initial Study
and Scoping Comments

Notice of Preparation/Initial Study

Terminal Island Maritime Support Facility Project

Prepared By:

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

THE PORT OF LOS ANGELES

with assistance from:

Aspen Environmental Group
5020 Chesebro Rd. Suite 200
Agoura Hills, CA 91301

December 2023

Application for Port Permit No. 230131-011

This page is intentionally blank.

Table of Contents

Page

1.0 PROJECT OVERVIEW AND BACKGROUND 1-1
1.1 California Environmental Quality Act Process 1-1
1.2 Document Format 1-3

2.0 PROJECT DESCRIPTION 2-1
2.1 Project Overview 2-1
2.1.1 Existing Conditions 2-1
2.1.2 Project Location 2-2
2.1.3 Project Background and Objectives 2-5
2.2 CEQA Baseline 2-6
2.3 Project Description 2-7
2.3.1 Construction 2-7
2.3.2 Construction Schedule 2-8
2.3.3 Operation 2-8

3.0 PROJECT PERMITS AND APPROVALS 3-1

4.0 INITIAL STUDY CHECKLIST 4-1
4.1 Environmental Factors Potentially Affected 4-2
4.2 Determination 4-3
4.3 Environmental Checklist 4-4

5.0 ENVIRONMENTAL ANALYSIS 5-1
5.1 Aesthetics 5-1
5.2 Agriculture and Forestry Resources 5-3
5.3 Air Quality 5-4
5.4 Biological Resources 5-5
5.5 Cultural Resources 5-8
5.6 Energy 5-9
5.7 Geology and Soils 5-10
5.8 Greenhouse Gas Emissions 5-13
5.9 Hazards and Hazardous Materials 5-13
5.10 Hydrology and Water Quality 5-16
5.11 Land Use Planning 5-19
5.12 Mineral Resources 5-24
5.13 Noise 5-24
5.14 Population and Housing 5-26
5.15 Public Services 5-26
5.16 Recreation 5-28
5.17 Transportation 5-29
5.18 Tribal Cultural Resources 5-30

5.19 Utilities and Service Systems....5-31
5.20 Wildfire....5-34
5.21 Mandatory Findings of Significance....5-35

6.0 PREPARERS AND CONTRIBUTORS....6-1
6.1 Los Angeles Harbor Department....6-1
6.2 Aspen Environmental Group Team....6-1

7.0 REFERENCES....7-1

Figures

Figure 2-1. Regional Location of the Proposed Project....2-3
Figure 2-2. Proposed Project Site....2-4
Figure 2-3. Project Site Plan....2-6
Figure 4-1. Existing PMP Land Use Designation....5-21
Figure 4-2. PMP Amendment....5-22

Appendices

Appendix A. Los Angeles Department of Transportation - Transportation Assessment Guidelines Plan Consistency Worksheet

Acronyms and Abbreviations

AB	Assembly Bill
APC	Area Planning Commission
APN	Assessor's Parcel Number
BMP	best management practices
CCC	California Coastal Commission
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CTP	Clean Truck Program
CY	cubic yards
DOC	Department of Conservation
DTSC	Department of Toxic Substances Control
ECOS	Environmental Conservation Online System
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FMS	Fenix Marine Services
GHG	greenhouse gas
HCP	Habitat Conservation Plan
IGP	Industrial General Permit
in/sec	Inches per second
IS	Initial Study
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LAFD	Los Angeles Fire Department
LAHD	Los Angeles Harbor Department
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	Los Angeles Sanitation and Environment
lf	Linear foot or feet
LID	Low-Impact Development
MBTA	Migratory Bird Treaty Act
MSF	Maritime Support Facility
MSL	mean sea level
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
PAH	polycyclic aromatic hydrocarbon
PCB	polychlorinated biphenyls
PMP	Port Master Plan
POLA	Port of Los Angeles
POLB	Port of Long Beach

PRC	Public Resources Code
RCP	reinforced concrete pipe
RFID	Radio Frequency Identification
SB	Senate Bill
SEA	Significant Ecological Area
sf	square foot or feet
SR	State Route
SVOCs	semi-volatile organic compounds
SWIRP	Solid Waste Integrated Resources Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAG	Transportation Assessment Guidelines
TIWRP	Terminal Island Water Reclamation Plant
TPH	total petroleum hydrocarbons
USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
UTR	utility tractor rigs
VOC	volatile organic compound

NOTICE OF PREPARATION / INITIAL STUDY

Pursuant to the California Environmental Quality Act (Division 13, Public Resources Code)

1.0 PROJECT OVERVIEW AND BACKGROUND

This Notice of Preparation (NOP)/Initial Study (IS) is to inform responsible and trustee agencies, public agencies, and the public that the Los Angeles Harbor Department (LAHD), as the Lead Agency under the California Environmental Quality Act (CEQA), has independently determined that there are potential significant environmental impacts associated with the proposed Terminal Island Maritime Support Facility (MSF) (MSF Project or "Proposed Project"), and an Environmental Impact Report (EIR) is required. The Project site is approximately 80 acres located at 740 Terminal Way, San Pedro, at the Port of Los Angeles (Port) Terminal Island. LAHD has prepared, as part of this NOP, an Initial Study Checklist for the EIR determination in accordance with current City of Los Angeles Guidelines for the Implementation of the California Environmental Quality Act of 1970 (Article I): the State CEQA Guidelines (Title 14, California Code of Regulations); and the California Public Resources Code (Section 21000, et seq.).

LAHD administers the Port under the California Tidelands Trust Act of 1911 and the Los Angeles City Charter. LAHD develops and leases Port property to tenants who operate the facilities. The Port provides a major gateway for international goods and services. The Port includes 23 major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger facilities. In addition to cargo business operations, the Port is home to commercial fishing vessels, shipyards, boat repair facilities, and recreational, community, and educational facilities.

The Proposed Project consists of the development and operation of a chassis support and container storage facility on an approximately 80-acre site. The Proposed Project would construct and install two 10-foot by 40-foot office trailers, maintenance and repair facilities, container stalls, and appurtenant water and electrical infrastructure. The existing vacant Eldridge Street office building (750 Eldridge Street, San Pedro) would also be refurbished to support operations. The chassis support facility could be operated by multiple companies, each of which would likely conduct chassis support operations out of separately built infrastructure. While not certain at this time, it is assumed that up to four different companies could operate on the site at once; however, use of the site by a single operator would yield higher throughput and therefore is the case analyzed. Ancillary use of the site may include the storage of empty containers. The Proposed Project would be operated for up to 25 years.

1.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT PROCESS

One of the main objectives of CEQA is to disclose the potential environmental effects of proposed activities to the public and decision-makers. CEQA requires that the potential environmental effects of a project be evaluated prior to implementation. Under CEQA, the lead agency is the public agency with primary responsibility over approval of a proposed project. Pursuant to Section 15367 of the CEQA Guidelines (14 CCR 15000 et seq.), LAHD is the lead agency for the

Proposed Project. As the lead agency, LAHD must complete an environmental review to determine if implementation of the Proposed Project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA and assist in making that determination in accordance with CEQA Guidelines Section 15063, an IS was prepared in accordance with CEQA (California Public Resources Code, Section 21000 et seq.), the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.), and the City of Los Angeles CEQA Guidelines.

This NOP/IS, along with public comments received during the scoping period, will determine what environmental issue areas may be adversely impacted by the Proposed Project. These issue areas will be assessed in the EIR to be prepared for the Proposed Project. The EIR will determine the nature and extent of any potential environmental impacts and establish any necessary and appropriate mitigation measures. The EIR will also include an evaluation of alternatives to the Proposed Project that would reduce or avoid significant impacts, including a No Project Alternative. A preliminary evaluation of the potentially affected environmental resources is included in IS Section 5.0, Environmental Analysis.

Consistent with State CEQA Guidelines Section 15082(a)(1), LAHD has identified the following potentially significant environmental effects of the Proposed Project, which will be addressed in the EIR: Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, and Transportation.

In accordance with CEQA and the State CEQA Guidelines, this NOP/IS will be circulated for a period of 45 days for public comment and scoping. The public comment period for this NOP/IS is scheduled to begin on December 7, 2023, and will conclude on January 22, 2024. This NOP/IS will be distributed to responsible and trustee public agencies and other interested or involved agencies, organizations, and private individuals for review. The NOP/IS is also available for review online at https://www.portoflosangeles.org/ceqa. A copy of the NOP/IS is available for public review at the Harbor Department Environmental Management Division, located at 425 South Palos Verdes Street, San Pedro, CA 90731. Please send your request to ceqacomments@portla.org or call (310) 732-7673 to schedule an appointment to review or pick up a copy.

During the 45-day public scoping period, the public has an opportunity to provide written comments on the information contained within this NOP/IS. Comments on the NOP/IS should be submitted in writing prior to the end of the 45-day public review period and must be postmarked by January 22, 2024.

Please submit written comments to:
Director of Environmental Management
City of Los Angeles Harbor Department
425 S. Palos Verdes Street
San Pedro, California 90731

Written comments may also be sent via email to ceqacomments@portla.org. Comments sent via email should include the project title, “Terminal Island Maritime Support Facility Project,” in the subject line. For additional information, please contact Jeremy Silva at (310) 732-7673 or ceqacomments@portla.org.

A virtual public scoping meeting for the Proposed Project will be held on Zoom on January 9, 2024.

1.2 DOCUMENT FORMAT

This NOP/IS contains the following five sections:

- **Section 1.0. Project Overview and Background.** This section provides an overview of the Proposed Project and the CEQA environmental documentation process.
- **Section 2.0. Project Description.** This section provides a detailed description of the Proposed Project's objectives and components.
- **Section 3.0 Project Permits and Approvals.** This section lists approvals and permits that could be required for the Proposed Project.
- **Section 4.0 Initial Study Checklist.** This section presents the CEQA checklist for all impact areas and mandatory findings of significance.
- **Section 5.0 Environmental Analysis.** This section presents the environmental analysis for each issue area identified on the environmental checklist. If the Proposed Project does not have the potential to significantly impact a given issue area, the relevant section provides a brief discussion of the reasons why no or less -than -significant impacts are expected. If the Proposed Project could have a potentially significant impact on a resource, the issue area discussion provides a description of potential impacts, and the issue area will be evaluated further in the EIR.
- **Section 6.0. Preparers and Contributors.** This section lists professional staff involved in the preparation of the NOP/IS.
- **Section 7.0 References.** This section provides a list of reference materials used during preparation of the NOP/IS.

The environmental analysis included in Section 5.0, Environmental Analysis, is consistent with the CEQA IS format presented in Section 4.0, Initial Study Checklist. Impacts are separated into the following categories:

- **Potentially Significant Impact.** This category is only applicable if there is substantial evidence that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less-than-significant level. Issues considered potentially significant will be further analyzed in the EIR.
- **Less-than-Significant Impact With Mitigation Incorporated.** This category applies where the incorporation of mitigation measures would reduce an effect from a "Potentially Significant Impact" to a "Less-than-Significant Impact." The lead agency must describe the mitigation measure(s) and briefly explain how they would reduce the effect to a less -than -significant level (mitigation measures from earlier analyses may be cross -referenced). Given that this is an IS, potentially significant impacts that require mitigation will be carried forward to the EIR for further analysis.
- **Less-than-Significant Impact.** This category is identified when the Proposed Project would result in impacts below the threshold of significance, and no mitigation measures are required.

Issues considered less than significant are discussed in this IS and will not be carried forward to the EIR.

- **No Impact.** This category applies when the Proposed Project would not create an impact in the specific environmental issue area. "No Impact" answers do not require a detailed explanation if they are adequately supported by the information sources cited by the lead agency that show that the impact does not apply to the specific project (e.g., the project falls outside of a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors and general standards (e.g., the Proposed Project would not expose sensitive receptors to pollutants based on a project-specific screening analysis). Issues considered to have no impact are discussed in this IS and will not be carried forward to the EIR.

2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

This Initial Study (IS)/Checklist has been prepared to evaluate the reasonably foreseeable and potentially significant adverse environmental impacts associated with the development and operation of a chassis support facility on an approximately 80-acre site (also referred to as the Terminal Island Maritime Support Facility [MSF] Project or "Proposed Project"). Due to the speculative nature of future operations at the site, the chassis support facility could be operated by multiple companies. While not certain at this time, it is assumed that up to four different companies could operate on the site at once utilizing separately built infrastructure, including separate charging stations and electric hook ups at the site. Chassis facilities operated by multiple companies would not generate more truck trips than with the site being operated by a single operator. This is because each operator would need to have their own separate infrastructure (such as ingress/egress gates, internal circulation roadways, and electrical infrastructure) which reduces the area available for chassis storage and other operational needs. This reduction equates to a reduced overall throughput for the Project site for the Port of Los Angeles (POLA). As such, trucking assumptions are based on a single operator (i.e., worst-case condition).

By nature of its operation, as explained herein, the chassis facility would generate more truck trips than the existing use of the site as an empty container storage facility. The environmental review for the Proposed Project therefore primarily assumes use of the site as a chassis support facility to ensure all potentially significant adverse impacts are identified as a worst-case condition. The site may also be used, entirely or in part, for storage of empty containers, in which case the resultant truck traffic (and related impacts) would be less than identified under the primary proposed use (chassis support). The Proposed Project, therefore, includes both types of future potential uses. The site is located at 740 Terminal Way in San Pedro, CA 90731 on Terminal Island in the Port of Los Angeles (Port). There are three non-exclusive right-of-way roads leading to the Project site, which would be utilized for access.

For the purposes of this analysis, the Proposed Project would require the issuance of a Los Angeles Harbor Department (LAHD) Entitlement for the site preparation and operation of the MSF, which would be active for up to 25 years. Therefore, this IS/Checklist assumes 25 years of operation for the analysis.

This section discusses the location, description, background, and objectives of the Proposed Project. This document has been prepared in accordance with the California Environmental Quality Act (CEQA), (Pub. Resources Code, § 21000 *et seq.*) as implemented by the State CEQA Guidelines (Cal. Code Regs., tit. 14, §15000 *et seq.*).

2.1.1 Existing Conditions

The approximately 80-acre Project site includes access roads (Terminal Way to the tunnel and Eldridge Street to the existing rail crossing) (Figure 2) and approximately 30 acres covered in unbound crushed miscellaneous base. The 80-acre site consists of an unoccupied parcel that is

currently unused. This site was recently used for empty container storage. Ancillary empty container storage operations began in 2021, and was operated Monday through Friday from 7:30 a.m. to 4:00 p.m., and 7:30 a.m. to 4:00 p.m. on Saturdays and Sundays as needed. Up to 7,090 containers were stored on the Project site as part of these past operations. The site was operating at full capacity in August 2022, with approximately 600 single gate-in moves (i.e., one gate-in occurs when a full cargo container is delivered to or shipped out of a terminal) occuring during peak operations. A roadability facility is located on site and consists of a corrugated metal shed and k-rail dividers. It was previously operated to verify that chassis were safe for the road. Approximately 11.2 acres were used for administrative purposes and queueing on site, where on-site trailers were used for office and administrative operations by approximately three employees. Guard shacks were also previously used for security at the site. The Project site is currently available for entitlements for temporary uses.

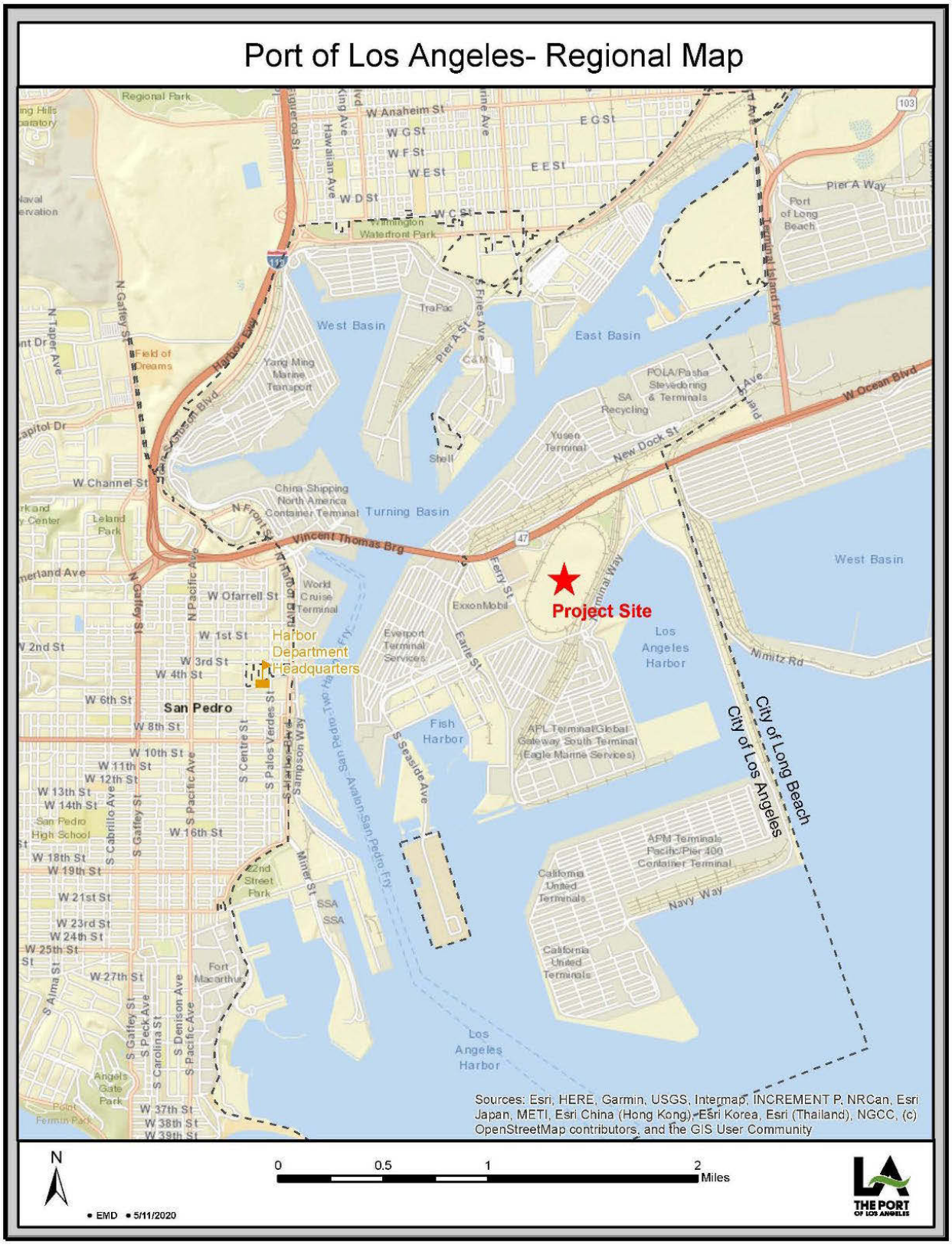
2.1.2 Project Location

Regional Setting

The Proposed Project would be located at the Port, on Terminal Island, 20 miles south of downtown Los Angeles (Figure 2-1). The Port encompasses 7,500 acres, including 3,300 acres of water and 43 miles of waterfront. It has approximately 270 commercial berths and 27 terminals, including leased facilities to handle containers, automobiles, dry bulk, breakbulk and liquid bulk products, as well as cruise ships and extensive transportation infrastructure for intermodal cargo movement by truck and rail. The Port also accommodates boat repair yards and provides slips for 3,800 recreational vessels, 78 commercial fishing boats, 35 miscellaneous types of small-service craft, and 15 charter vessels for sport fishing and harbor cruises. Additionally, the Port accommodates water-dependent recreational, visitor-serving, community, and educational facilities, such as a public beach, the Cabrillo Beach Youth Waterfront Sports Center, Cabrillo Marine Aquarium, Los Angeles Maritime Museum, 22nd Street Park, and Wilmington Waterfront Park.

The LAHD, a proprietary department of the City, is charged with operation, maintenance, and management of the Port. As a landlord, the LAHD leases properties to more than 300 tenants, including private terminal, tug, marine cargo, and cruise industry operators. The LAHD administers operations and projects at the Port under California Constitution Article X, California PRC Section 6306 (“Tidelands Trust Statute”), as granted by the City from the California legislature. The LAHD is therefore chartered to develop and operate the Port in a manner that benefits maritime uses, including the support and access facilities needed to accommodate the demands of import and export waterborne commerce.

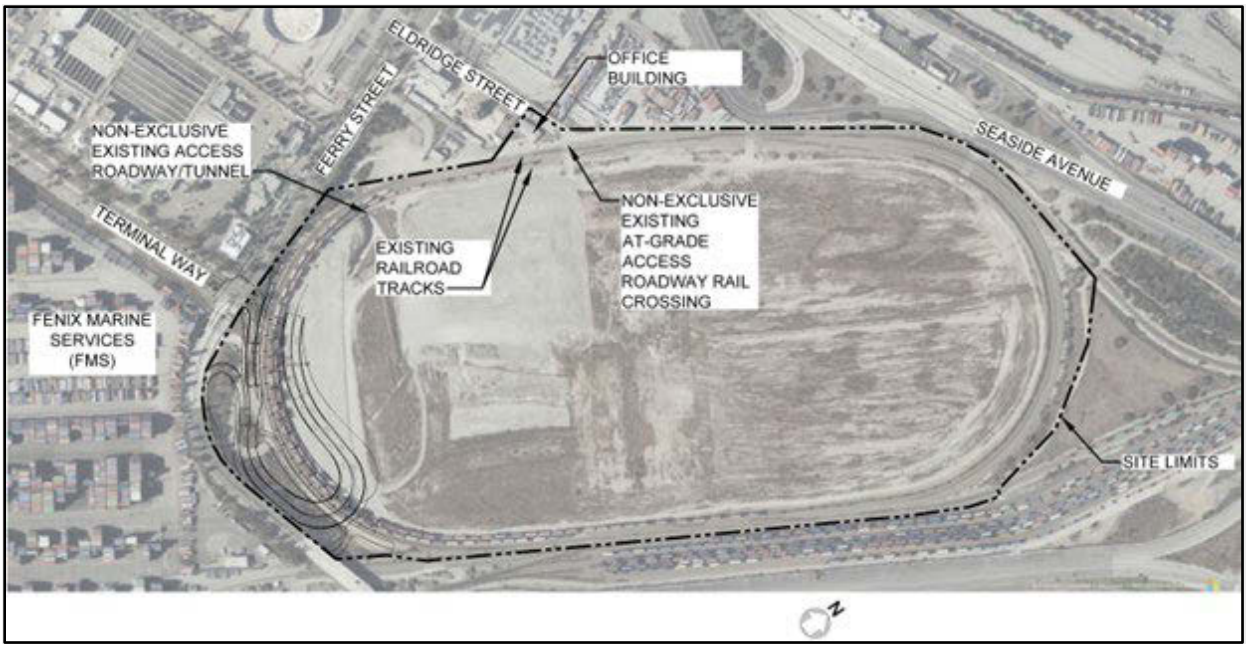
Figure 2-1. Regional Location of the Proposed Project



Project Setting and Rail Grade Separation

The Project site is located at 740 Terminal Way, San Pedro, CA 90731. The site is bounded by Navy Way to the east, Ferry Street to the west, Terminal Way to the south, and State Route (SR) 47 to the north (Figures 2-1 and 2-2). The Port would be constructing a rail grade separation roadway that would serve as the site access (Figure 2-2). This grade separation is not part of the Proposed Project, as the modifications are required to allow for safe traffic patterns for future site usage.

Figure 2-2. Proposed Project Site



The Project site is comprised of approximately 80 acres, with three supporting access roads. The total acreage to be permitted for use under the Proposed Project amounts to approximately 80 acres of land. Approximately 41.2 acres of the site have been operated as an empty container storage yard with a roadability center, trailer office space, and guard shacks for security (see also Section 2.1.1, Existing Conditions).

Operations staff would be housed in the existing single-story Eldridge Street office building (750 Eldridge Street, San Pedro), located immediately west and across the street from the Project site. The Eldridge Street office building was originally used as an administrative office for the petroleum coke plant formerly operated by Los Angeles Export Terminal.

Land Use and Zoning

The Proposed Project is located within the Port. The site is held in trust by LAHD on behalf of the State of California, is a part of the City of Los Angeles General Plan and governed by the Los Angeles Board of Harbor Commissioners. The Port Master Plan (PMP) establishes policies and guidelines to direct the future development of the Port (LAHD, 2018). The PMP includes five planning areas and establishes the policies and guidelines to direct the future development of the Port pursuant to the California Coastal Act and consistent with The State Tidelands Trust.

The Project site is within Planning Area 3 of the PMP. Planning Area 3 is the largest planning area, consisting of approximately 1,940 acres and more than 9.5 miles of usable waterfront. This planning area focuses on container operations. The Project site is subject to both the Maritime Support and Liquid Bulk land use designations as indicated in the PMP (LAHD, 2018). Of the 80-acre site, 24 acres are zoned Maritime Support, and 56 acres are zoned Liquid Bulk. Under the Proposed Project, the land use designation of Liquid Bulk would be changed to Maritime Support through a PMP Amendment. The Project site is on Assessor's Parcel Number (APN) 7440-022-BRK, which is designated General/Bulk Cargo – Non-Hazardous (Industrial and Commercial) and is zoned qualified-heavy industrial ([Q]M3-1) under the City of Los Angeles Zoning Ordinance (City of Los Angeles, 2023a).

2.1.3 Project Background and Objectives

Project Background

The entire Port, including the Proposed MSF, is part of the United States Department of Transportation (USDOT) designated National Multimodal Freight Network. The MSF would be improved and expanded to provide 71 net acres of chassis/empty container storage for all 12 container terminals located in the POLA and Port of Long Beach (POLB). These terminals, combined, handle 35 percent of all waterborne containers entering and exiting the entire United States (U.S.). With the development of this MSF, chassis can be stored off-terminal, allowing for additional storage of containers and increased efficiency on-terminal.

A variable amount of the available 30 acres of the MSF site area was previously used for the temporary storage of empty containers. Figure 2-3 illustrates the Proposed Project's site plan.

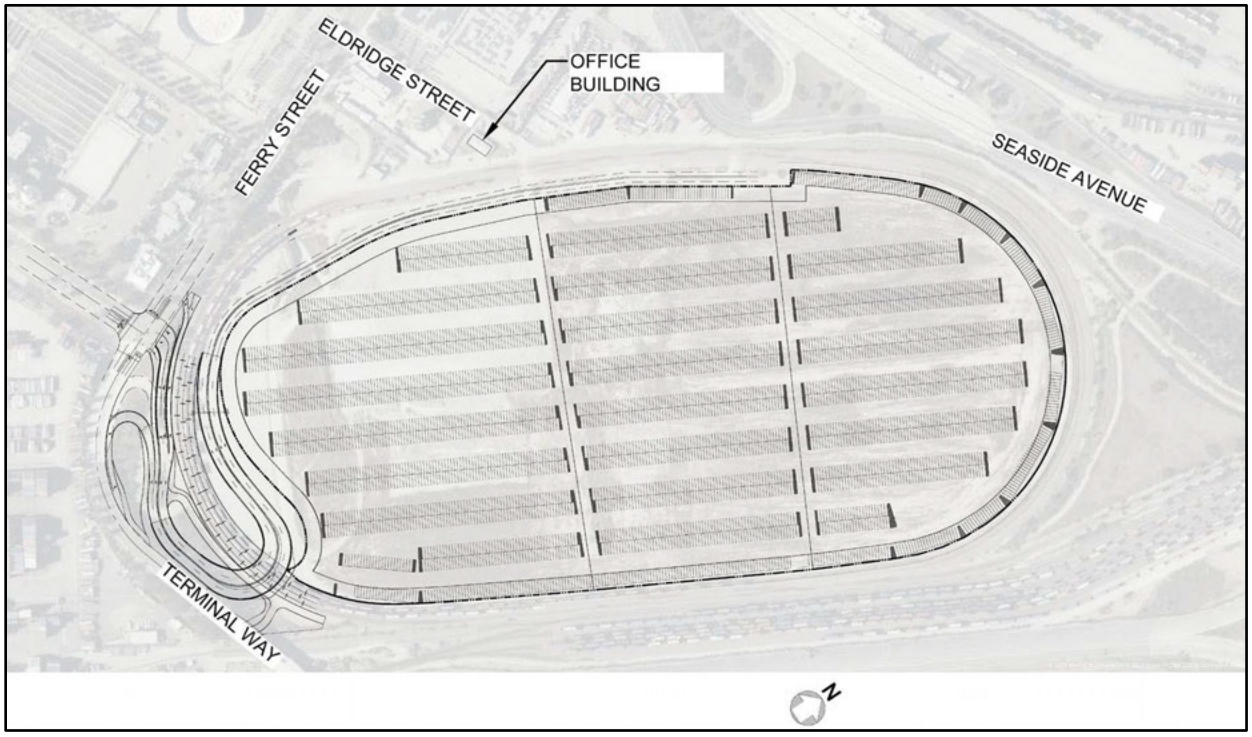
Project Objectives

The objectives of the Proposed Project are the following:

1. issue a Term Permit for the operations of the chassis support facility for up to 25 years;
2. optimize the use of existing land to support chassis storage at the Project site;
3. reduce import container dwell time (i.e., the time that a container spends at a terminal);
4. reduce container terminal visit time (and idling) due to eliminated chassis retrieval;
5. reduce inefficient chassis trips: currently, bobtails (truck tractors) are sometimes not able to obtain a chassis in the terminal and need to go to another terminal to retrieve a chassis and then return to the same terminal to retrieve a container, thus resulting in additional truck trips and vehicle miles traveled;
6. reduce double handling of empty containers at container terminals in POLA-POLB;
7. increase on-terminal efficiency by providing a centralized location with readily available chassis, compared to congested on-terminal chassis storage;
8. provide a full-service depot that would increase the efficiency of terminal operations by providing storage, maintenance, repair, and stop/start functions of chassis and/or empty containers on chassis storage;

9. increase the efficiency of goods movement in the Port by providing off-terminal maritime support to help meet the demands of Port marine terminals now and in the future; and
10. meet the POLA's zero emissions cargo handling equipment requirements by January 1, 2030.

Figure 2-3. Project Site Plan



For the purposes of CEQA, the Proposed Project assumes as a worst-case use of the Project site as a chassis support facility and ancillary empty container storage facility, operated by a single operator. Use of the site by multiple operators or for the storage of empty containers would result in fewer daily truck trips to the site. In this evaluation, the Proposed Project involves the storage, repair, and maintenance of chassis as well as the operation of supporting office space(s) both on site (office trailers) and off site (Eldridge Street office building).

2.2 CEQA BASELINE

CEQA provides for an EIR to assess the significance of a project's impacts in comparison to a baseline that consists of the existing physical environmental conditions at and near the Project site. Baseline conditions are normally measured at the time of commencement of environmental review of a Proposed project. CEQA Guidelines, Section 15125, subdivision (a), provides:

> *An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.*

The baseline conditions for the Proposed Project includes the existing conditions of the site, which consists of an unoccupied parcel that is currently unused. No construction or employee trips currently occur. The Proposed Project would represent a new use at the site and generate new chassis and storage container facility activities and both passenger vehicle and truck trips.

2.3 PROJECT DESCRIPTION

2.3.1 Construction

The Proposed Project would include development of the approximately 80-acre site for the use as a chassis depot and ancillary empty container storage facility. This chassis depot may be operated by up to four separate operators. Empty containers may be stacked on site up to five high. Proposed construction activities for the site include:

- construction of two 10-foot by 40-foot office trailers;
- interior modification (e.g., replace carpet, repair utilities, repaint interior, etc.) of an approximately 2,900-square-foot (sf) office building at 750 Eldridge Street that can be shared among up to four operators (existing potable water connection, toilets, sinks, and sanitary sewer are available);
- installation of up to four corrugated metal Maintenance and Repair facilities;
- installation of approximately 3,600 container stalls (e.g., parking spaces) at 90 degrees;
- installation of 40 high mast light poles (maximum height of 100 feet);
- as-needed installation of vaults, switchgears, transformers, associated concrete pads/ foundations, and conduit;
- installation of approximately 7,000 linear feet (lf) of chain-link fencing;
- construction of one approximately 30-foot tall, 16,000 sf, neutral tone steel canopy structure above a concrete foundation for use as a roadability canopy, two approximately 200-sf longshore restrooms, and two approximately 300-sf guard booths;
- installation of stormwater drainage and sewage systems;
- installation of approximately 40 fire hydrants; and
- installation of asphalt concrete to pave approximately 75 acres of the 80-acre site for backland storage use.
- Installation of charging and fueling infrastructure.

The remaining 5 acres would be added to the existing tunnel area as part of the future rail grade separation. The sewage system would include 3,000 lf of 15-inch vitrified clay pipe. For the Project's potable water supply, construction would include 11,000 lf of 12-inch ductile iron pipe, and 320,000 gallons of water would be used during construction activities.

Other Project-related construction activities include asphalt concrete repairs, 530,000 lf of four-inch striping, 4,000 sf of operational striping, and operational signage would be performed on non-exclusive access roads leading to and from the Project site (see Figure 2-2). Removal of trees

and brush would be performed. Based on the Terrestrial Biological Characterization Survey for the Project site, tree species observed include Australian wattle, Mexican fan palm, lemon-gum eucalyptus, Canary Island pine tree, carrotwood, jacaranda, tree tobacco, willow, Peruvian pepper, Brazilian pepper, and salt cedar (LAHD, 2023). A total of 239 non-native ornamental individual trees were recorded in the Project area. Although these trees are not native, each individual tree surveyed had a cumulative diameter at breast height of over eight inches and are therefore considered non-protected significant trees (LAHD, 2023). Authorizations from the City for the removal and trimming of non-protected significant trees would be required prior to construction activities. The size and number of replacement trees would be determined based on the tree subject to removal (LAHD, 2023). An approximately 3-acre laydown area would be utilized for proposed construction operations. Low-Impact Development (LID) water drainage capture infrastructure would be installed as needed throughout the site. This would include 4,600 lf of 36-inch reinforced concrete pipe (RCP), 4,500 lf of 18-inch RCP, 4,500 lf of 8-inch trench drains, 4,700 lf of longitudinal curb and gutter, 20 catch basins, seven maintenance holes and storm drain filtration trenches for LID compliance.

Preliminary soil testing would be completed prior to construction ground disturbance to characterize the absence or presence of any contaminants and aid in determining handling and disposal protocols. Additionally, the Environmental Baseline Investigation indicates low levels of contaminants within the property, including total petroleum hydrocarbons (TPH), metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs) (LAHD, 2017). These contaminants would be handled and disposed of in compliance with existing regulations related to hazardous waste.

Construction would regrade approximately 60,000 CY of material and require approximately 270,000 CY of exported material. Excavation is expected to be up to 5 feet.

2.3.2 Construction Schedule

Construction of the Proposed Project would span approximately 24 months, beginning in September 2025 and concluding in August 2027. Construction activities would take place between 7:00 a.m. and 4:00 p.m. Monday through Friday and between 8:00 a.m. and 4:00 p.m. on Saturdays, as needed. Up to 60 construction workers would be needed. Temporary construction lighting would be required. Relocation of existing utilities would not be required.

2.3.3 Operation

Under the Proposed Project, a chosen tenant or tenants would operate a chassis depot(s), which would provide chassis storage, maintenance, and repair facilities as noted above. An ancillary use of the facility would be for the storage of empty cargo containers, up to five containers high. Yard equipment to support chassis depot operations would include fourteen 30,000-pound zero-emission forklifts, fourteen 10,000-pound zero-emission forklifts, and two zero-emission utility tractor rigs (UTRs). All yard equipment would be required to be zero emissions by January 1, 2030. Any diesel operations would cease by December 31, 2029, and would be tracked and enforced once an entitlement is issued. The Permit/Lease would require 100 percent transition to

zero emissions by January 1, 2030, and any non-conforming equipment would be a breach of the Permit/Lease.

Should the site be used as empty container storage, additional pieces of equipment would be needed, including two top handlers and eight additional UTRs. Mobile fuel service trucks would provide diesel and propane for on-site equipment until 100 percent of yard equipment is transitioned to zero emissions by January 1, 2030. Electric charging infrastructure would also be constructed in order to meet the energy demand of on-site equipment and to meet zero emissions regulations. No additional on-site equipment is anticipated to support Proposed Project operations.

A total of 80 employees are estimated to be required for the Proposed Project. Additionally, the Proposed Project would comply with the Clean Truck Program (CTP). Only drayage trucks registered in the Ports Drayage Truck Registry or having a day pass would be admitted to the Project site. This would be achieved by installing a Radio Frequency Identification (RFID) reader at the entrance to the Project site or having a gate attendant confirm truck status to ensure that only drayage trucks compliant with the CTP enter.

When operated entirely as a chassis yard, the MSF would serve up to 3,200 and 5,900 truck trips per day, under opening day (year 2027) and year 2046 conditions, respectively. These are not new truck trips generated to/from the POLA-POLB. Rather, the MSF merely results in the minor geographic diversion of existing bobtails. The diversion would direct bobtails to the MSF site to retrieve chassis. The bobtails would then travel to their respective POLA-POLB container terminals. For example, existing westbound bobtail trips on SR 47-Seaside Avenue destined to the adjacent Fenix Marine Services (FMS) terminal in the POLA would proceed to the MSF via the driveway on Ferry Street to retrieve chassis and then proceed back to the FMS terminal using Ferry Street/Avenue/Terminal Way.

Operations under the Proposed Project would occur under a new entitlement for up to 25 years.

This Page Intentionally Left Blank

3.0 PROJECT PERMITS AND APPROVALS

Under CEQA, the lead agency is the public agency with primary responsibility over approval of the Proposed Project. Pursuant to State CEQA Guidelines Section 15367, the CEQA lead agency for the Proposed Project is the LAHD.

Anticipated permits and approvals that may be required to implement the Proposed Project are listed below.

- LAHD Entitlement
- LAHD Coastal Development Permit
- LAHD Harbor Engineer Permit
- Los Angeles Department of Building and Safety (LADBS) Building Permit
- Los Angeles Department of Transportation (LADOT) B-Permit
- California Coastal Commission Port Master Plan Amendment (with concurrence by the California Coastal Commission)
- State Water Resources Control Board (SWRCB) Construction General Permit
- State Water Resources Control Board Industrial General Permit

This Page Intentionally Left Blank

4.0 INITIAL STUDY CHECKLIST

1	**Project Title:**	Terminal Island Maritime Support Facility Project
2	**Lead Agency Name and Address:**	Los Angeles Harbor Department (LAHD) Environmental Management Division 425 South Palos Verdes Street San Pedro, California 90731
3	**Contact Person and Phone Number:**	Jeremy Silva (310) 732-7673
4	**Project Location:**	740 Terminal Way San Pedro, California 90731
5	**Project Sponsor's Name and Address:**	LAHD 425 South Palos Verdes Street San Pedro, CA 90731
6	**Port Master Plan Designation:**	Planning Area 3, Maritime Support and Liquid Bulk
7	**Zoning:**	Qualified Heavy Industrial ([Q] M3-1)
8	**Description of Project:**	The Proposed Project consists of the development operation of a chassis support and container storage facility on an approximately 80-acre site. The Proposed Project would construct and install two on-site office trailers, maintenance and repair facilities, container stalls, and appurtenant water and electrical infrastructure. The chassis support facility could be operated by up to four different companies, each of which would likely conduct chassis support operations out of separately built infrastructure and the existing vacant office building on Eldridge Street. The site may also be used for storage of empty containers. The Proposed Project would be operated for up to 25 years.
9	**Surrounding Land Uses/Setting:**	The Project site is surrounded primarily by container operations. Los Angeles Fire Department Station 40 is located adjacent to the west of the Project site, east of Ferry Street. The Terminal Island Water Reclamation Plant is located to the west of the Project site, west of Ferry Street.
10	**Other Public Agencies Whose Approval Is Required:**	• LAHD Entitlement • LAHD Coastal Development Permit • LAHD Harbor Engineer Permit • Los Angeles Department of Building and Safety (LADBS) Building Permit • Los Angeles Department of Transportation (LADOT) B-Permit • California Coastal Commission Port Master Plan Amendment (with concurrence by the California Coastal Commission) • State Water Resources Control Board (SWRCB) Construction General Permit • State Water Resources Control Board Industrial General Permit

11	**Have California Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21808.3.1?**	No (refer to Section 5.18, Tribal Cultural Resources)

4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project (i.e., the Proposed Project would involve at least one impact that is a "Potentially Significant Impact"), as indicated by the checklist on the following pages.

- ☐ Aesthetics
- ☐ Agriculture and Forestry Resources
- ☒ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☒ Energy
- ☐ Geology and Soils
- ☒ Greenhouse Gas Emissions
- ☒ Hazards and Hazardous Materials
- ☐ Hydrology and Water Quality
- ☐ Land Use and Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population and Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities and Service Systems
- ☐ Wildfire
- ☒ Mandatory Findings of Significance

4.2 DETERMINATION

On the basis of this initial evaluation:

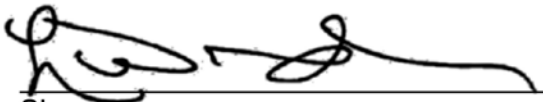
I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☐

I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☒

I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required. ☐



Signature

11/30/2023

Date

Lisa Wunder, Acting Director
Environmental Management Division
City of Los Angeles Harbor Department

4.3 ENVIRONMENTAL CHECKLIST

Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "no impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "no impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "no impact" answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially significant impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "potentially significant impact" entries when the determination is made, an EIR is required.
4. "Negative declaration: less than significant with mitigation incorporated" applies when the incorporation of mitigation measures has reduced an effect from a "potentially significant impact" to a "less-than-significant impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less -than -significant level.
5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063[c][3][D]). In this case, a brief discussion should identify the following:
    (a) Earlier analysis used. Identify and state where earlier analyses are available for review.
    (b) Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    (c) Mitigation measures. For effects that are "less than significant with mitigation incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site -specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting information sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   (a) the significance criteria or threshold, if any, used to evaluate each question, and
   (b) the mitigation measure identified, if any, to reduce the impact to a less-than-significant level.
10. The evaluations within this IS assume compliance with all applicable federal, state, and local laws, regulations, rules, and codes. In addition, the evaluation assumes that all conditions in applicable agency permits are complied with, including but not limited to local permits, air quality district permits, water quality permits and certifications, United States (U.S.) Army Corps of Engineers permits, and other agency permits, as applicable.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, **would the project:**				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the project:**				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland-zoned Timberland Production (as defined by Government Code §51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		☐	☒	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?	☐	☐	☐	☒
5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	☐	☐	☐	☒

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒
6. ENERGY. Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
7. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
b. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;	☐	☐	☒	☐

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
(iii) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒
11. LAND USE PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
12. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
13. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
14. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☐	☒
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒
16. RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒
17. TRANSPORTATION. Would the project:				
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒
18. TRIBAL CULTURAL RESOURCES				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or	☐	☐	☐	☒

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
(ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **would the project:**				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐
c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

This Page Intentionally Left Blank

5.0 ENVIRONMENTAL ANALYSIS

5.1 AESTHETICS

Discussion:

a. Would the project have a substantial adverse effect on a scenic vista?

Less-than-Significant Impact. The Conservation Element of the City of Los Angeles General Plan defines a scenic vista as a panoramic public view with access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features (City of Los Angeles, 2001). While there are views of the Port and Pacific Ocean from the eastern end of the Project site, these views are interrupted by Port infrastructure such as tanks, gantry cranes, and cargo containers. The general Project area is highly developed and characterized by industrial uses and does not consist of any protected or designated scenic vistas. The Project site is located within the Port's Planning Area 3, Terminal Island, which focuses on container operations. It contains six of the Port's nine container terminals. The PMP identifies Terminal Island as an area for opportunities to provide additional space for expanding container and liquid bulk cargoes (LAHD, 2018). The Project site is currently unoccupied, and the Proposed Project would include new structures and activities. The Project site would be used for chassis operations (i.e., storage, maintenance, repair, and stop/start functions) and container storage. These activities would be visible primarily from adjacent roads including SR-47, Ferry Street, and Terminal Way. The tallest proposed structures at the Project site would be the mast light poles, which would be up to 100 feet tall. These which would not substantially obscure public views of the Pacific Ocean and would be consistent with the general views of adjacent terminals.

Project construction would include shallow excavation, grading, compacting, installation of equipment, canopy, and buildings to support the proposed chassis and container storage facility, followed by operations, none of which would have any substantial adverse effects on a scenic vista. During operations, empty containers may be stacked up to five high. Container storage operations would be similar to the existing visual landscape of container storage operations to the north, west, and south of the Project site. The Proposed Project would result in activities consistent with those that currently exist within the Port. Impacts to a scenic vista would be less than significant, and this issue will not be addressed further in the EIR.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. The Project site is not visible from an eligible or designated State scenic highway. The nearest designated State scenic highway is located approximately 28 miles northwest of the Project (State Highway 27 post miles 1.0-3.5) (Caltrans, 2023). The nearest eligible State scenic highway (State Highway 1 from State Highway 19 near Long Beach to I-5 south of San Juan Capistrano) is approximately 7 miles northeast of the Project site (Caltrans, 2023). In addition to California Department of Transportation (Caltrans)-designated State scenic highways, the City of Los Angeles has city-designated scenic highways, but the

Project site is not visible from any of these highways (City of Los Angeles, 2016). As such, there are no scenic resources, including but not limited to trees, rock outcroppings, or historic buildings, within a State scenic highway that could be substantially damaged by the Project. No impact would occur, and this issue will not be addressed further in the EIR.

c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The Project site is located in an urbanized area and would not conflict with any applicable zoning and land use regulations governing scenic quality. The Project site is currently zoned for heavy industrial use, and the Proposed Project would not require any changes to the existing zoning. The Proposed Project does not involve the construction of any large obtrusive structures that would conflict with or degrade the existing visual character or quality of the surrounding area. The proposed structures, including the 100-foot-tall high mast lighting structures, would be consistent with the surrounding industrial and terminal uses and would not conflict with heavy industrial zoning. No impacts to existing visual character or quality would result from the Proposed Project, and the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. This issue will not be addressed further in the EIR.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less-than-Significant Impact. The Project site is currently unoccupied and does not contain lighting. Forty new high mast light poles would be installed as part of the Proposed Project. The nighttime lighting environment in the Project vicinity consists mainly of ambient light produced from street lighting adjacent to the Project site, terminals, and other facility lighting at the Port. The primary source of nighttime illumination at the Port is the extensive system of down lights and flood lights attached to the tops of tall light poles throughout the terminals. Bright, high-intensity boom lights are attached on top of shipping cranes along the edge of terminals and channels along the harbor. The proposed high mast light poles would not be as bright or intense as boom lights. Therefore, while the Proposed Project would install new lighting structures, the design would follow backlight, up light, and glare (collectively referred to as “BUG”) requirements, building code requirements, and Title 24 requirements which restrict lighting on the water. As such, the Proposed Project would not produce substantial light or glare which would affect day or nighttime views of the area. Impacts would be less than significant. This issue will not be addressed further in the EIR.

5.2 AGRICULTURE AND FORESTRY RESOURCES

Discussion:

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program identifies the Project site within Urban and Built-Up Land, which is defined as land occupied by residential, industrial, commercial, institutional, or other similar structures with a building density of approximately six structures to a ten-acre parcel (DOC, 2022). The Project site is located within an industrial area, and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance that would be converted to accommodate the Proposed Project. Therefore, no impact on designated farmland would occur, and this issue will not be addressed further in the EIR.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act aims to preserve agricultural and open space lands by restricting use to farming and ranching uses through a contract between local governments and private landowners (DOC, 2023a). The Project site is zoned qualified-heavy industrial in Height District 1 ([Q]M3-1), and there are no agricultural zoning designations or agricultural uses within the Project limits or adjacent areas (City of Los Angeles, 2023a). No agricultural or open space land with Williamson Act contracts is located within the Project site. As such, no impact on existing zoning for agricultural use or a Williamson Act contract would occur, and this issue will not be addressed further in the EIR.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?

No Impact. As discussed in Section 5.2(b) above, the Project site is zoned for qualified-heavy industrial in Height District 1 ([Q]M3-1), and no forest land is within or near the Project site. Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact on land zoned for forest land would occur, and this issue will not be addressed further in the EIR.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project site is located at the Port which does not include forest land. As such, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact on forest land would occur, and this issue will not be addressed further in the EIR.

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed in Sections 5.2(a) through (d) above, no farmland or forest land is within the Project site or the surrounding area. The Project site is located in a highly urbanized and industrial area. As such, the Proposed Project would not involve changes in the existing environment that could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, no impact on agricultural or forest land uses or activities would occur, and this issue will not be addressed further in the EIR.

5.3 AIR QUALITY

Discussion:

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Proposed Project would result in increased emissions of criteria air pollutants associated with construction activities and operation as a chassis depot and container storage facility. Project construction activities are estimated to take approximately 24 months. Emissions from operations as a chassis support facility would occur for up to 25 years. The EIR will evaluate whether the Proposed Project would conflict with applicable air quality plans, including the Air Quality Management Plan for the South Coast Air Basin and the San Pedro Bay Ports Clean Air Action Plan.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?

Potentially Significant Impact. The South Coast Air Basin has a history of non-attainment conditions and violations of the ambient air quality standards. The Proposed Project, in conjunction with other related projects, has the potential to contribute to significant cumulative air quality impacts. Therefore, the EIR will evaluate whether the Proposed Project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors are people that are particularly susceptible to adverse health impacts from air contaminants. The following are land uses where sensitive receptors are typically located: residences, schools, playgrounds, childcare centers, and health care facilities such as hospitals. Construction activities may expose sensitive receptors to air pollution in the form of diesel-powered equipment exhaust and fugitive dust emissions. Operational activities, including use of the site as a chassis depot with maintenance and repair facilities and container storage facility, may also cause emissions that can expose sensitive receptors to increased levels of air pollutants, including toxic air contaminants. Therefore, the EIR will evaluate whether the Proposed Project would expose sensitive receptors to substantial pollutant concentrations.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less-than-Significant Impact. Construction of the Proposed Project may temporarily cause odors from the use of diesel-powered equipment and vehicles. Odors from operation of the Proposed Project could be caused by the chassis maintenance and repair facilities before the facility fully transitions to zero-emissions equipment by 2030. However, there are no sensitive receptors (i.e., homes, hospitals, schools, nursing homes, etc.) that are located within 0.25 mile of the Project site. The nearest sensitive receptors are liveaboards in Newmarks Yacht Centre, approximately 1 mile north of the Project site. Odors generated during construction and operation would adequately disperse over this distance to levels below objectionable odor levels. By January 1, 2030, zero-emissions equipment would be required for 100 percent of all yard equipment and would generate no odorous emissions. Therefore, this impact would be less than significant, and this issue will not be addressed further in the EIR.

5.4 BIOLOGICAL RESOURCES

Discussion:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less-than-Significant Impact. The Project site is heavily disturbed and provides very little wildlife or native plant habitat. No special-status plants were observed during surveys in early 2023 and none are expected to be present. No special-status wildlife species were observed during the surveys in early 2023. However, one species, brown pelican, has a low potential to occur in the vicinity of the Project site or may potentially fly over the Project site. The species is not expected to nest or roost in the Project area or nearby areas, nor is suitable nesting or roosting habitat present. Therefore, California brown pelican is not likely to be impacted by the Proposed Project, and no avoidance or minimization measures are recommended. No other special-status wildlife species have potential to occur within or

adjacent to the Project area based upon known ranges, habitat preferences for the species, and species occurrence records from the California Natural Diversity Database.

Given the limited extent of native habitat in the Project area, the absence of special-status plants and wildlife, and the nature of the Project activities, the Proposed Project's impacts to special-status species would be less than significant. This issue will not be addressed further in the EIR.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less-than-Significant Impact. Mulefat thickets were mapped within several low-lying areas within the Project site. This vegetation community is ranked G4S4 and is not considered sensitive by the California Department of Fish and Wildlife (CDFW). No sensitive plant communities were observed in the study area of the Terrestrial Biological Characterization Survey completed for the Proposed Project (LAHD, 2023). Therefore, impacts would be less than significant, and this issue will not be addressed further in the EIR.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less-than-Significant Impact. The Biological Characterization Survey prepared for the Project site (LAHD, 2023) evaluated two "freshwater ponds" and one "lake" that were observed on site. Although a number of excavated basins contained mulefat, the mulefat was not a reliable indicator in the Project area because it was also present in upland areas. Additionally, no hydric soils were found at soil sampling points, and no primary or secondary indicators of hydrology were observed. All excavated basins and a stormwater conveyance feature were determined to be non-jurisdictional. Surface water that was observed on site was attributed to a heavy rain event 10 days prior to the jurisdictional delineation or was observed in areas where water percolation was limited. Therefore, Project activities would not require permits under Sections 401 or 404 of the Clean Water Act and Porter-Cologne Water Quality Control Act, Fish and Game Code Section 1600 *et seq.*, or California Coastal Commission (LAHD, 2023). Therefore, impacts would be less than significant, and this issue will not be addressed further in the EIR.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less-than-Significant Impact. There are no known terrestrial or marine mammal migration corridors within the Port Complex, including the Project site, because the Port is not located between natural resource areas that terrestrial wildlife would need to traverse. Therefore, the Proposed Project would not interfere with terrestrial wildlife migration, and no impacts would occur. This issue will not be addressed further in the EIR.

Project activities within the Project site may impact nesting birds protected by the Migratory Bird Treaty Act (MBTA) and Fish and Game Code. The MBTA prohibits the take (including killing, capturing, selling, trading and transport) of protected migratory bird species, including active nests, without prior authorization by the Department of Interior U.S. Fish and Wildlife Service. California Fish and Game Code Section 3503.5 prohibits take or possession of birds of prey or their eggs; and Section 3513 prohibits take or possession of any migratory nongame bird. Most birds on the Project site could easily fly around or over the work area, but nesting birds in the vegetation, old structures, or on the ground may be impacted if Project activities start during the nesting season (February 15 – September 1).

As part of the Proposed Project and in compliance with state and federal laws protecting nesting birds, LAHD would conduct pre-construction surveys and monitoring for nesting birds if construction activities are conducted between February 15 and September 1. If nesting birds are detected, LAHD would implement no-disturbance buffers until the nestlings have fledged. The size of the buffers would be based on the judgment of a qualified biologist. The biologist would determine the buffer based on the species' ecology, their tolerance to disturbance, and the type of construction activity that is occurring. Periodic monitoring would be conducted to ensure the nest is not disturbed. Potential impacts to wildlife nursery sites, specifically nesting bird habitat, would be less than significant. This issue will not be addressed further in the EIR.

Given the limited extent of the Project area, the absence of wildlife corridors and nesting habitat, and the short duration of construction activities, the Proposed Project's impacts on the movement of any native resident or migratory fish or wildlife species would be less than significant. This issue will not be addressed further in the EIR.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The Project is located in a highly developed area with very little native vegetation present. A limited number of non-native plants and ornamental trees are expected to be removed as part of the Proposed Project. The only biological resources protected by the City Ordinance (Ordinance No. 177404) pertain to specific tree species including oak trees, Southern California black walnut, Western sycamore, and California Bay. All trees observed onsite are non-native, such as Australian wattle, Mexican fan palm, lemon-gum eucalyptus, and Canary Island pine tree, and none of these are protected by City Ordinance. Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, no impacts would occur, and this issue will not be addressed further in the EIR.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?

No Impact. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other similar plans that overlap with the Project area (USFWS, 2023). The nearest conservation plan area is the Rancho Palos Verdes Natural Community Conservation Plan area, which is located approximately 5 miles west of the Project area (City of Rancho Palos Verdes, 2019). The County of Los Angeles (County) has established official, designated areas, referred to as Significant Ecological Areas (SEAs), within the County that contain rare or unique biological resources. The Terminal Island (Pier 400) California least tern nesting site is the only SEA in the Port and is located approximately 2 miles south of the Project site. The Proposed Project would have no impact on Pier 400. As such, the Proposed Project would not conflict with adopted conservations plans related to biological resources, and this issue will not be addressed further in the EIR.

5.5 CULTURAL RESOURCES

Discussion:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?

No Impact. The Proposed Project would not cause a substantial adverse change or effect to a historical resource. The Proposed Project area is located on the northern portion of Terminal Island, which is an artificial landform composed of harbor dredged and industrial-grade fill. The Port provided the results of a recent cultural resources record search, and no identified reports have been located that discuss the presence of historically eligible or listed resources at 740 Terminal Way. The Eldridge Street office building was built in 2001 and is not a historical resource. Since there are no significant historical resources located within the Project area, the Proposed Project would not cause a substantial adverse change in the significance of an historical resource. Therefore, no impacts would occur, and no mitigation is required. This issue will not be addressed further in the EIR.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?

No Impact. The Proposed Project would not cause a substantial adverse change or effect to an archaeological resource. As discussed above, the Project area is located on the northern portion of Terminal Island, which is an artificial landform composed of harbor dredged and industrial grade fill. No identified reports have been located that discuss the presence of historically eligible, listed, or unique archaeological resources at 740 Terminal Way. Because the Project site is composed of harbor dredged material and industrial-grade fill, it can be anticipated that the Proposed Project would not cause a substantial adverse change in the significance of an archaeological resource. No impacts would occur, and no mitigation is required. This issue will not be addressed further in the EIR.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

No Impact. The Proposed Project would not disturb human remains. As discussed above, the Project area is within an already disturbed and developed context, and the soil within the Project area is composed of industrial-grade fill. Background archival research failed to find any potential for human remains (e.g., the existence of formal cemeteries). Therefore, no impact would occur, and this issue will not be addressed in the EIR.

5.6 ENERGY

Discussion:

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. The Proposed Project would consume energy resources in the form of non-renewable fossil fuels and electricity during construction and operations. Construction would involve the short-term consumption of transportation fuels and electricity by equipment and vehicles. Construction would take approximately 24 months. Construction would not require a substantial use of electricity as most equipment would be powered by diesel, gasoline, or propane. Operations would require electric power for zero-emission yard equipment and transportation fuels, primarily diesel, propane, and gasoline, due to truck trips, workers commuting to the site, the office, and the maintenance and repair facilities for up to 25 years. The EIR will evaluate whether energy use to support the Proposed Project would constitute wasteful, inefficient, or unnecessary consumption of energy resources.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less-than-Significant Impact. The Proposed Project would involve the construction and operation of a chassis depot and container storage facility, including construction of charging stations and electric hook ups at the Project site. The Proposed Project would not conflict with adopted state or local renewable energy plans or any of the Port's energy plans. The Proposed Project would not cause any change in existing renewable energy infrastructure, such as solar or wind-powered electric generating facilities. The City of Los Angeles would need to issue Building and Safety Permits for new buildings and would ensure compliance with energy efficiency requirements under the California Green Building Code and Appliance Efficiency Regulations (Title 24 and Title 20 of the California Code of Regulations, respectively). LAHD is responsible for design, inspection, management, and oversight of construction projects to ensure projects comply with energy efficiency requirements. Energy consumption would be minimized in accordance with energy efficiency standards, and energy used during construction and operation would facilitate achieving the objectives of the Proposed Project, which include reducing inefficient chassis support operations. Therefore, these uses do not conflict with or obstruct energy plans, and this impact would be less than significant. This impact will not be addressed further in the EIR.

5.7 GEOLOGY AND SOILS

Discussion:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. No known faults cross or are immediately adjacent to the Project site. The closest known active fault is the Palos Verdes fault zone, located approximately 0.5 miles west of the Project site (USGS, 2023a), and the closest Alquist-Priolo zoned fault is the Newport-Inglewood fault zone approximately 6 miles northeast of the Project site (CGS, 2023). The offshore potentially active (late Quaternary) THUMS-Huntington Beach fault is mapped approximately 0.5 miles west of the Project site trending generally toward the southern end of the Project site. However, the fault is not mapped onshore, nor does it traverse the Project site (USGS, 2023a). No impact would occur from rupture of a known fault, and this issue will not be addressed further in the EIR.

ii) Strong seismic ground shaking?

Less-than-Significant Impact. The Proposed Project is located in a seismically active area of Southern California with numerous on- and offshore active faults capable of generating large earthquakes and significant seismic ground shaking in the Project area. Onshore faults in the Project area include the Palos Verdes fault zone, Newport-Inglewood fault zone, Santa Monica fault, Hollywood fault, Malibu Coast fault, Sierra Madre fault zone, Elsinore fault zone, Puente Hills Blind Thrust, and Lower Elysian Park Blind Thrust. Offshore faults in the Project area include the offshore sections of the Palos Verdes and Newport-Inglewood fault zones, San Diego Trough fault, THUMS-Huntington Beach fault, San Clemente fault, Oceanside fault, Santa Cruz-Catalina Ridge fault, and Thirty Mile Bank fault. The Project site may experience strong to very strong ground shaking from a large earthquake on any of these faults. The exposure of people and structures to seismic ground shaking is a potential risk with or without the Proposed Project and cannot be avoided. However, incorporation of modern standard engineering and safety standards in Project design and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse effects to people and structures. Emergency planning and coordination would also reduce injuries to on-site personnel during seismic activity. With incorporation of emergency planning and compliance with current regulations and standard engineering practices, this impact is considered less than significant. This issue will not be addressed further in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Less-than-Significant Impact. The Proposed Project is located within a mapped California Geological Survey liquefaction hazard zone (CGS, 2023). Hydraulic and alluvial fill are common in the Port and harbor areas, and in conjunction with shallow groundwater levels, are subject to liquefaction and lateral spreading in the event of large earthquakes. However, incorporation of modern standard engineering and safety standards in Project design, and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse effects to people and structures. Therefore, this impact is considered less than significant. This issue will not be addressed further in the EIR.

iv) Landslides?

No Impact. The topography of the Project site and surrounding area is primarily flat to gently sloping. Portions of the Project area have been graded with elevations of approximately 12 to 15 feet above mean sea level (MSL); the remainder of the site is relatively flat, although uneven, with elevations ranging from 13 to 20 feet elevation. The Project site and immediately surrounding area would not be subject to landslides or other slope failures due to natural causes, Project construction or operation, or seismic events. As such, there is no impact related to landslides, and this issue will not be addressed further in the EIR.

b. Result in substantial soil erosion or the loss of topsoil?

Less-than-Significant Impact. The Proposed Project would include grading and excavation activities during construction that would loosen soils and could contribute to surface erosion. The Proposed Project would be subject to the requirements of the National Pollution Discharge Elimination System (NPDES) Stormwater Program, which requires obtaining coverage under the General Permit for Discharges of Stormwater Associated with Construction Activity, and the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). A new Project-specific SWPPP compliant with the requirements of the State Water Resources Control Board (SWRCB) Industrial General Permit (IGP) Order No. 2014-0057-DWQ and Construction General Permit (CGP) Order 2009-0009-DWQ and the NPDES Permit would be required to cover the Project. Compliance with NPDES and SWPPP requirements, including any erosion and sediment controls identified in the SWPPP, would further reduce potential impacts. After construction, the Project site would be completely paved which would prevent erosion. The impact would be less than significant, and this issue will not be addressed further in the EIR.

c. Be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less-than-Significant Impact. As discussed in Section 5.7(a)(iv), the Project site would not be subject to landslides. The Project site is not on or near any free facing slopes or banks and would therefore not be subject to lateral spreading. However, as discussed in Section 5.7(a)(iii), the site would be subject to liquefaction in the event of a large earthquake on nearby or regional faults. Adverse effects due to liquefaction would be minimized due to

incorporation of modern standard engineering and safety standards in Project design, and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes. Therefore, this impact is considered less than significant.

Although areas of regional subsidence due to groundwater and oil extraction (USGS, 2023b) are mapped in the POLA area and in close proximity to the Proposed Project (0.3 miles east, 0.7 miles northwest, and 1.25 miles west), the Proposed Project is not mapped within a subsidence area. Additionally, the Proposed Project does not include a groundwater supply well or oil wells. Groundwater extraction for construction activities with excavations may be required due to the presence of shallow tidally influenced groundwater. However, this groundwater extraction would be limited and temporary, as excavation depths are expected to be up to five feet. Therefore, the Proposed Project would not contribute to subsidence in the area. The impact would be less than significant. This issue will not be addressed further in the EIR.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less-than-Significant Impact. Expansive soils may exist at the Project site that could result in adverse impacts to Project structures such as cracking and distress of foundations. The required geotechnical investigation to comply with County of Los Angeles and LAHD building codes and design requirements would identify any expansive soils, and appropriate design measures would be incorporated as part of Project design. Recommendations from the geotechnical investigation regarding expansive soils would be implemented in compliance with City of Los Angeles and LAHD design guidelines, LAHD Engineering review recommendations, and the Los Angeles Building and Municipal Codes. Compliance with geotechnical recommendations, standard engineering practices, and design guidelines and regulations would minimize impacts related to expansive soils. Therefore, the impact would be less than significant. This issue will not be addressed further in the EIR.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Proposed Project would be connected to municipal sanitary sewer lines. Septic tanks and alternative wastewater disposal would not be used. No impact would occur, and this issue will not be addressed further in the EIR.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The Proposed Project site is underlain by artificial fill. Artificial fill has no paleontological sensitivity, and therefore, proposed ground disturbing activities have no potential to damage or destroy unique paleontological resources. No impact would occur, and this issue will not be addressed further in the EIR.

5.8 GREENHOUSE GAS EMISSIONS

Discussion:

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Construction and operation activities would result in direct and indirect GHG emissions from use of fuels and electricity by equipment and vehicles and use of energy by the office building and chassis maintenance and repair facilities. Sources of direct GHG emissions during construction would include the off-road equipment and on-highway vehicles. Construction would take approximately 24 months. Operations would generate GHG emissions for up to 25 years from truck trips and from the use of diesel, propane, gasoline, and electricity by yard equipment, workers commuting to the site, the office, and the maintenance and repair facilities. Provision of water, wastewater, and solid waste services would also indirectly generate GHG emissions. The EIR will evaluate whether the direct and indirect GHG emissions of the Proposed Project may have a significant impact on the environment.

b. Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. The sources of GHG emissions caused by the Proposed Project during development of the site and operation as a chassis depot and container storage facility may have the potential to conflict with plans or policies adopted for the purpose of achieving GHG emission reductions. This impact will be discussed in the EIR.

5.9 HAZARDS AND HAZARDOUS MATERIALS

Discussion:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less-than-Significant Impact. The Proposed Project would involve limited transport, storage, use, and disposal of hazardous materials during construction and operation. Some examples of hazardous materials handling during construction include the transport of fuels, lubricants, and solvents associated with construction equipment, as well as the transport of potentially contaminated soils excavated from the Project site. Potentially contaminated soil may be encountered during Project construction and may need to be handled and disposed of at an appropriate landfill permitted to accept the waste. Hazardous materials that could be used during the Proposed Project operation include lubricants, solvents, acids, paints, and fuels. When not in use, these hazardous materials would be stored in approved containers and in a proper manner to prevent leakage or accidents as required by State and local regulations. Operational vehicles and equipment would be fueled at the charging and fueling infrastructure or by mobile fuel service trucks. Project construction may expose sensitive receptors and the environment, including soil, groundwater, and the harbor to hazardous

materials. During storm events, spills or leaks of hazardous materials could infiltrate soils causing contamination of underlying soil or the groundwater, or runoff into the harbor and adversely affect harbor water quality and marine life. However, standard best management practices (BMPs) would be implemented to address these incidents, such as using drip pans to catch leaks or spills during refueling activities and requiring on-site fuels to be stored in secured and enclosed containers. Implementation of the Project-specific SWPPP would also reduce impacts related to polluted runoff. During Project operation, spills or leaks would not infiltrate soils, as all operations would occur on paved surfaces that are maintained and periodically inspected and repaired as needed to ensure integrity. Therefore, impacts would be less than significant, and this issue will not be addressed further in the EIR.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less-than-Significant Impact. As described in Section 5.9(a), Project construction and operation activities would require the limited use of hazardous materials, such as fuels, lubricants, and solvents. The storage and use of hazardous materials during construction and operation could result in the accidental release of hazardous materials typically associated with minor spills or leaks. However, standard BMPs would be implemented to address these incidents, such as using drip pans and storing on-site fuels in secured and enclosed containers. Implementation of the Project-specific SWPPP would also reduce impacts related to polluted runoff. Therefore, impacts would be less than significant, and this issue will not be addressed further in the EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no schools within one-quarter mile of the Proposed Project. No impact would occur, and this issue will not be addressed further in the EIR.

d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. The Proposed Project site is currently listed on the California Department of Toxic Substances Control (DTSC) Envirostor website as a No Further Action Military Evaluation site due to the Project and surrounding area's previous use by the Navy from 1935 until 1980 (DTSC, 2023). Areas east and southeast of the Project site were used for various arms, explosives, and munitions storage and a practice bomb range and small arms shooting range (USACE, 2006). A review and inspection of the site as part of the Formerly Used Defense Site Military Munition Response Program did not find any munitions or explosives of concern (USACE, 2006) and in 2007, based on site surveys and limited soils testing, the DTSC listed the site as No Further Action (DTSC, 2007). The Project site is not listed on any other environmental database sites.

Historically, from approximately 1997 until 2006, the Project site was used for petroleum coke bulk storage where coal was shipped by rail to the site, stored in massive, covered pads, and then transferred by conveyor belt to a specialized crane to be loaded onto ships. Remnant and residual levels of soil and groundwater contamination that would result in adverse impacts to sensitive receptors may be encountered during ground disturbing construction activities. The Environmental Baseline Investigation prepared by Pacific Edge Engineering, Inc. determined that the Project site has a low potential for human health risk (LAHD, 2017). Preliminary soil testing would be conducted prior to construction ground disturbance and any contaminants would be removed or remediated according to current local, State, and federal regulations.

The EIR will evaluate whether the Proposed Project would expose sensitive receptors to adverse impacts from existing environmentally contaminated soil and groundwater.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The closest airports to the Proposed Project site are the Torrance Municipal Airport - Zamperini Field, located just over 5 miles to the northwest, and the Long Beach Airport, located approximately 7.5 miles to the northeast. The Project is not within or near the Planning Boundaries for either airport (ALUC, 2004). No impact would occur, and this issue will not be addressed further in the EIR.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact. While most construction activities would take place outside of public roadways, periodic temporary construction or maintenance activities may temporarily block or close local access routes. The Proposed Project would not physically interfere with an adopted emergency response plan, as coordination with both the Los Angeles Fire Department and the Los Angeles Port Police would occur prior to construction activities. Emergency access in the vicinity of the Project site would be maintained for emergency service vehicles during construction activities, as construction traffic would be intermittent and temporary, and any road closures would be temporary during construction activities. The Proposed Project is not expected to substantially affect traffic circulation or increase demand on existing emergency response services during construction or operation. Therefore, the Proposed Project would not interfere or impair implementation of emergency response or evacuation plans, and impacts would be less than significant. This issue will not be addressed further in the EIR.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The Proposed Project is not located within a wildland area. Additionally, the Port and Project area are listed as "not burnable" on the US Forest Service Wildfire Hazard Potential website (USFS, 2023). The Los Angeles Fire Department (LAFD) provides fire protection services within the Port. No impact would occur, and this issue will not be addressed further in the EIR.

5.10 HYDROLOGY AND WATER QUALITY

Discussion:

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality?

Less-than-Significant Impact. The Proposed Project would require grading and shallow excavation during construction to install utilities such as stormwater drainage and sewage systems. Ground disturbing activities near the water could result in discharges of sediment to harbor waters that could cause temporary water quality impacts such as sedimentation and contamination. The Proposed Project would be subject to the requirements of the NPDES Stormwater Program, which requires obtaining coverage under the General Permit for Discharges of Stormwater Associated with Construction Activity, and the development and implementation of a SWPPP. The new Project-specific SWPPP compliant with the requirements of the SWRCB IGP, CGP, and NPDES Permit would be required for the Project. Compliance with the NPDES and SWPPP requirements would reduce potential impacts to less than significant.

Depending on the Project site's infiltration rates, during operations, the Proposed Project may include Low-Impact-Development (LID) water drainage capture infrastructure, such as catch basins and storm drain filtration trenches, which would capture on-site stormwater flows and prevent them from entering the harbor. This new LID water drainage capture system would reduce stormwater-related impacts to marine water quality. Alternatively, if infiltration is infeasible at the Project site, an on-site artificial stormwater basin would be constructed to direct flows to a pipe that would divert stormwater to the off-site storm drain system. Wastewater generated by on-site office facilities would be connected to the municipal wastewater treatment provider, and no wastewater would be stored or disposed of on site or into the harbor. The impact would be less than significant, and this issue will not be addressed further in the EIR.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. Groundwater in the harbor area is located south of the Dominguez Gap Barrier and experiences seawater intrusion from San Pedro Bay, rendering it unsuitable for potable uses. Further, the Project site is not used or designated for groundwater recharge. Shallow

excavation would be necessary to construct the LID water drainage capture system and underground utilities; however, dewatering would not be required due to the minimal excavation depths (up to 5 feet). Because the Project site is not used for groundwater recharge or other groundwater-related beneficial uses, construction and operation activities at the site would not interfere with groundwater supplies. The Project would have no impact on groundwater supplies or recharge, and no mitigation is required. This issue will not be addressed further in the EIR.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site.

Less-than-Significant Impact. The Proposed Project would have no impact on the course or configuration of any waterbody because there are no streams or rivers on the site, and in-water work would not occur.

The Proposed Project would increase impervious areas through the pavement of approximately 75 acres. Paving the site could alter the existing draining patterns. Construction would comply with the stormwater-related requirements in the NPDES Permit, which would minimize the amount of runoff and the potential for substantial erosion or siltation to occur. During construction, LAHD contractors would develop and follow a SWPPP compliant with the requirements of the SWRCB CGP Order 2009-0009-DWQ, as amended. Compliance with this construction SWPPP, including any erosion and sediment controls identified in the SWPPP, would further reduce potential impacts.

During operation, LAHD would be required to obtain coverage under the SWRCB IGP Order No. 2014-0057-DWQ, as amended, and as required under the IGP, a SWPPP would be developed and implemented. During operations, the Proposed Project's drainage would be handled by the on-site LID water drainage capture system, which would comply with the City's LID requirements. The LID system would minimize off-site erosion and siltation and ensure sufficient drainage. Implementation of the SWPPP and LID system would reduce impacts to less than significant, and this issue will not be addressed further in the EIR.

(ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;

Less-than-Significant Impact. The Proposed Project would not change the vulnerability of the Project site to flooding because it would not lower the site's elevation, remove barriers to flooding, or install features that could substantially increase flood flows. Surface runoff would increase because of the increased amount of impervious paving. However, the existing storm drain system would convey flows off site, and the Proposed Project may install a LID-compliant drainage system or alternative artificial infiltration drainage system that would ensure additional flow capacity and proper conveyance of surface runoff. This would reduce the potential for flooding on or off site and improving the capacity of the stormwater drainage systems. This issue will not be further addressed in the EIR.

(iii) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less-than-Significant Impact. The Proposed Project has the potential to increase storm-water runoff with the addition of new impervious areas, and stormwater runoff may contain particulate matter or industrial chemicals that could enter harbor waters. There is a potential for hazardous material to enter harbor water during construction. The Proposed Project would be subject to the requirements of the NPDES Stormwater Program, which requires obtaining coverage under the General Permit for Discharges of Stormwater Associated with Construction Activity, and the development and implementation of a SWPPP. Compliance with NPDES and SWPPP requirements would reduce potential impacts related to polluted runoff. On-site drainage systems would be constructed such that storm flows and dry-weather runoff would not enter harbor water. If feasible, the LID water drainage capture system would prevent flows from entering harbor water and would include LID features such as catch basins and storm drain filtration trenches to improve water quality of runoff. Alternatively, if infiltration is infeasible on site, an artificial infiltration basin and additional storm drainpipes would be installed to divert water to the existing off-site storm drain system. Additionally, as discussed in Section 5.10(c)(i), LAHD would be required to obtain coverage under the SWRCB IGP, and as required under the IGP, a SWPPP would be developed and implemented to reduce pollution in runoff. The Proposed Project would not exceed the capacity of the new stormwater drainage systems nor create substantial additional sources of polluted runoff. Therefore, impacts would be less than significant, and this issue will not be further addressed in the EIR.

(iv) impede or redirect flood flows?

No Impact. The Project site is not within a flood hazard zone according to Federal Emergency Management Agency (FEMA) National Flood Hazard Layer Viewer (FEMA, 2021). The site is relatively flat to gently sloping. The Proposed Project would grade the site to generally match grades and include new structures, pavement, and underground utilities. These features would not increase the vulnerability of the site to flooding and would not substantially affect flood flows. Accordingly, no impact would occur. This issue will not be further addressed in the EIR.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less-than-Significant Impact. The Project site is approximately 400 feet west of Seaplane Lagoon and approximately 1,200 feet northwest of Pier 300 Shallow Water Habitat (LAHD, 2018). These bodies of water are partially enclosed and may result in seiches during certain conditions. However, the Project has a low risk of releasing pollutants in the event of a seiche, as the site would be used for chassis operations and storage of containers, and hazardous materials, such as acetylene, diesel fuel, ethylene glycol, gasoline, motor oil, oxygen, and propane would be properly stored on site during fueling activities. Fossil fueling activities would cease on January 1, 2030, when 100 percent of yard equipment would be required to

be zero emissions. If the site were inundated by a seiche, the on-site drainage system would properly convey flows offsite without releasing pollutants to the harbor.

According to the California Department of Conservation (DOC), the Project site is located within a tsunami inundation area (DOC, 2023). However, the *Tsunami Hazard Assessment for the Ports of Los Angeles and Long Beach* (Moffatt and Nichol, 2007) modeled the possibility of tsunami propagation into the Ports and concluded that a tsunami caused by local seismic activity, or an underwater landslide would be unlikely to occur more than once every 10,000 years. Under the most severe tsunami scenario modeled, the Port Complex model predicts a maximum tsunami wave height of approximately 1.79 meters at Pier 300 (where the Project is located) (Moffatt and Nichol, 2007, Table 4-1). This wave height would not cause overtopping of the site, as the adjacent lowest deck elevation at Pier 300 is 3.71 meters, which is greater than the modeled maximum tsunami wave height. The risk of releases is expected to be low due to the low maximum tsunami wave height in comparison to the lowest deck elevation. Therefore, impacts would be less than significant, and this issue will not be evaluated further in the EIR.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. Responsibility for the protection of surface water and groundwater quality in California rests with the SWRCB and nine Regional Water Quality Control Boards. According to regulatory requirements and as part of its management of stormwater runoff, construction of the Proposed Project would require a SWRCB CGP, and operations would require coverage under the IGP and development of a new project specific SWPPP. LID requirements would also be implemented as required. These regulatory requirements would minimize pollutant loading. The Proposed Project would not interfere with any water quality or groundwater management plan, and no impact would occur. This issue will not be further addressed in the EIR.

5.11 LAND USE PLANNING

Discussion:

a. Would the project physically divide an established community?

No Impact. The Project site is located within the Port in an industrial area that does not contain any established communities. Residential communities are located to the north, east, and west of the Project site, with the nearest community, San Pedro, approximately 1.2 miles to the west. These communities are currently separated from the Project site by roadways, channel waters, and existing Port facilities. The physical division of an established community typically refers to the construction of a linear feature, such as a major highway or railroad tracks or removal of a means of access, such as a local road or bridge that would impair mobility within an existing community or between a community and outlying area. Under existing conditions, the Project site is not used as a connection between established communities. Instead, connectivity in the surrounding area is facilitated via regional and local roadways, such as SR-47, Interstate 110, and Interstate 710. Construction and operation of

the Proposed Project would not affect the connectivity between residential communities and these roadways because the Project site is located more than one mile away from these communities and is surrounded on all sides by channel waters, as well as existing Port facilities and operations. In addition, the Proposed Project would occur on a parcel that has been used for existing Port operations and would include construction and operation activities that remain consistent with existing and surrounding uses. The Proposed Project would not physically divide an established community. Therefore, no impacts would occur, and no mitigation is required. This issue will not be addressed further in the EIR.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less-than-Significant Impact. Applicable land use plans and regulations for the Project site include the PMP and the City of Los Angeles General Plan and Zoning Ordinance. The Project site is within Planning Area 3 of the PMP. Planning Area 3 is the largest planning area, consisting of approximately 1,940 acres and more than 9.5 miles of usable waterfront. This planning area focuses on container operations. Of the 80-acre Project site, 24 acres are zoned Maritime Support, and 56 are zoned Liquid Bulk; as such, the Project site is subject to both the Maritime Support and Liquid Bulk land use designations as indicated in the PMP (Figure 4-1) (LAHD, 2018). Operations associated with the chassis support facility and container storage facility would be consistent with the Maritime Support land use, which is defined as "water-dependent and non-water-dependent operations necessary to support cargo handling and other maritime activities" (LAHD, 2018).

However, the existing Liquid Bulk designation is not consistent with proposed facilities, as this designation is for "water-dependent uses focused on storage, receipt, and delivery of liquid bulk commodities." Per the PMP, a Plan amendment is required if a new land use is proposed on a site that is inconsistent with its land use designation(s). Therefore, under the Proposed Project, a PMP Amendment would be necessary to change the land use for 56 acres of the Project site from Liquid Bulk to Maritime Support (Figure 4-2).

The Project site is on Assessor's Parcel Number (APN) 7440-022-BRK, which is designated General/Bulk Cargo – Non Hazardous (Industrial and Commercial) and is zoned qualified-heavy industrial ([Q]M3-1) under the City of Los Angeles Zoning Ordinance (City of Los Angeles, 2023a). In addition, the Project parcel is zoned qualified-heavy industrial in Height District 1 ([Q]M3-1) under the City of Los Angeles Zoning Ordinance (City of Los Angeles, 2023b). The "qualified" designation, as shown with the symbol [Q], indicates that a property so designated might be restricted or prohibited for some uses ordinarily permitted in the underlying zone classification, and/or that development on such designated sites may be required to conform to certain additional use standards. The [Q] in this zone restricts uses to General Cargo, limited Port-related commercial, industrial, and support uses. The zone limits the storage of hazardous materials, liquid, or solid bulk that is flammable, explosive, or produces a flammable, toxic, or suffocating gas.

Figure 4-1. Existing PMP Land Use Designation

Figure 4-2. PMP Amendment

The Proposed Project would not conflict with this designated zoning because the proposed uses are consistent with the permitted uses in this zone, including cargo container storage within the boundaries of the Port of Los Angeles Community Plan area.[1]

In addition, the proposed structures, including the office building and canopy structure, would conform to the height requirements associated with Height District 1, which are dependent on the zoning classification of adjacent properties, distance from those properties, and surrounding topography. Finally, the proposed uses would not include the storage of flammable or explosive substances, or substances that would produce flammable, toxic, or suffocating gases. Therefore, the Proposed Project would be consistent with the City of Los Angeles General Plan and Zoning Ordinance.

The rationale for the Proposed Project's consistency with each policy is as follows:

Policy 1.1 – Develop new commercial or industrial projects within, contiguous with, or in close proximity to existing developed areas able to accommodate it with adequate public services. (California Coastal Act Section 30250)

Rationale: The Proposed Project includes the construction and operation of a chassis support facility and container storage facility adjacent to existing developed areas on a site that has been partially operated as an empty container storage yard with a roadability center, trailer office space, and guard shacks for security. The Proposed Project includes the installation of stormwater drainage and sewage systems, and electrical infrastructure. However, the installation of these public services is minimized because the Project site is located adjacent to existing developed areas.

Policy 1.2 – Protect coastal areas for port-related developments and water-dependent developments. (California Coastal Act Section 30255)

Rationale: The Proposed Project would be constructed in a developed area of the Port to support water-dependent maritime uses.

Policy 1.3 – The Port is encouraged to modernize and construct necessary facilities within the boundaries of the Port in order to minimize or eliminate the necessity for future dredging and filling to create new ports in new areas of the state. (California Coastal Act Section 30701)

Rationale: The Proposed Project would be constructed within the Port boundaries, which would eliminate future dredging and filling to create new ports in the state.

While a Plan amendment would be required, the Proposed Project would not conflict with any of the PMP Section 7.2 policies relating to land use or the location, design, and

[1] According to the City of Los Angeles Zoning Ordinance, a cargo container storage yard is defined as: "An open-air site or facility, the primary use of which is the keeping of empty cargo containers, and equipment, and may have as accessory uses the storage of container chassis and truck cabs, repair facilities, warehouses and offices associated with the movement or storage of cargo containers. This definition does not include draying, freighting or trucking yards or terminals."

construction of development. Therefore, under a Plan Amendment, the Proposed Project would not conflict with the land use of the site or its surroundings and would not conflict with the PMP land use policies (LAHD, 2018) or any applicable land use plans. The Proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant, and this issue will not be addressed further in the EIR.

5.12 MINERAL RESOURCES

Discussion:

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. According to the DOC Geologic Energy Management Division, the Project site is not within an oil field, and no oil and gas wells are located within the site boundaries (DOC, 2023b). According to the City of Los Angeles General Plan Conservation Element, the Project site is not located in a Mineral Resource Zone (City of Los Angeles, 2001). The nearest well, City of Los Angeles Well 2, is located approximately 0.3 mile west of the Project site (DOC, 2023b). The Proposed Project would not conflict with existing oil extraction land uses or prevent future oil extraction. As such, the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Therefore, no impacts would occur, and this issue will not be addressed further in the EIR.

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. As described in Section 5.12(a), the Project site is not located within a Mineral Resource Zone, oil field, or an area that contains oil and gas wells. The Proposed Project would not conflict with existing oil extraction land uses or prevent future oil extraction. As such, the Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur, and this issue will not be addressed further in the EIR.

5.13 NOISE

Discussion:

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less-than-Significant Impact. Vibration-sensitive land uses include high-precision manufacturing facilities or research facilities with optical and electron microscopes. None of these occur in the Project area. Therefore, the significance threshold for "excessive ground-borne vibration" depends on whether a nuisance, annoyance, or physical damage to any buildings could occur. The City of Los Angeles does not specify a significance criterion of vibration, but Caltrans developed guidelines for construction activities and estimates that vibration levels exceeding 0.3 inches per second (in/sec) can damage older residential structures and cause substantial annoyance to humans (Caltrans, 2020). Such vibration levels would not occur in any offsite location in the vicinity of the Project site. The impact of groundborne vibration would be less than significant, and no mitigation is required.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less-than-Significant Impact. Vibration-sensitive land uses include high-precision manufacturing facilities or research facilities with optical and electron microscopes. None of these land uses occur in the Project area. Therefore, the significance threshold for "excessive ground-borne vibration" depends on whether a nuisance, annoyance, or physical damage to any buildings could occur. The City of Los Angeles does not specify a significance criterion of vibration, but Caltrans developed guidelines for construction activities and estimates that vibration levels exceeding 0.3 in/sec can damage older residential structures and cause substantial annoyance to humans (Caltrans, 2020). Such vibration levels would not occur in any offsite location in the vicinity of the Project site. The impact of groundborne vibration would be less than significant, and no mitigation is required.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less-than-Significant Impact. The Project site is not located within an airport land use plan. The Catalina Sea and Air Terminal Heliport is a private heliport, located approximately one mile west of the Project site at Berth 95. Helicopters normally travel to Catalina Island over the Main Channel, which is about 3,000 feet from the Project site. The nearest public airports are Torrance Municipal Airport – Zamperini Field Airport – located over 5 miles to the north-northwest, and Long Beach Airport, located over 7 miles to the northeast. Given the distance between the Project site and the identified airports and heliport, and the infrequent nature of helicopter operations, workers at the Project site would not be exposed to excessive noise levels from airplanes or helicopters. The impact of airport noise levels would be less than significant, and no mitigation is required.

5.14 POPULATION AND HOUSING

Discussion:

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The Proposed Project would not develop any new residential facilities, extend any roads, or develop other growth-accommodating infrastructure. Up to approximately 60 workers are estimated to be employed for the 24-month construction period, based on the assumed number of crews for excavation, truck trips needed for hauling material, and the number of proposed buildings. Additionally, approximately 154 workers would be employed for operation of the Proposed Project. The Project site is within the Port and proximate to a well-established, heavily populated urban community that provides sufficient existing housing stock and established infrastructure. Additionally, there is an adequate supply of workers in the vicinity of the Project given the urban setting. The population of the City of Los Angeles is expected to grow by approximately eight percent between 2020 and 2030, and this growth has been planned for in the General Plan Housing Element (City of Los Angeles, 2021). The majority of the Project's workers would likely come from the existing local workforce, and the number of new workers requiring relocation would be negligible compared to the City's projected population growth. As such, the Proposed Project would not induce substantial unplanned population growth in the area either directly or indirectly. Therefore, no impacts on housing would occur, and this issue will not be addressed further in the EIR.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing is present within the boundaries of the Project site that would be displaced, and no replacement housing would be necessary. There is no formal housing within the Port, although there are liveaboard tenants at the marinas to the southwest of the Project site. The Proposed Project would not displace the marina liveaboards. As such, the Proposed Project would not result in the displacement of any people or housing or necessitate the construction of replacement housing elsewhere. No impacts on housing would occur, and this issue will not be addressed further in the EIR.

5.15 PUBLIC SERVICES

Discussion:

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

a. Fire Protection?

Less-than-Significant Impact. LAFD provides fire protection and paramedic services within the City and the Port. LAFD Station 40 (330 Ferry Street), which is located immediately adjacent west of the Project site, provides fire protection and paramedic services to the Project site (LAFD, 2023). Emergency access in the vicinity of the Project site would be maintained for emergency service vehicles during construction, as construction traffic would be intermittent and temporary, and road closures, if necessary, would also be temporary. During operations, 40 fire hydrants on site would provide water for fire suppression. No substantial adverse physical impacts for new or altered fire protection services would occur during construction and operations. As discussed in Section 5.14(a), the Proposed Project would not directly or indirectly induce unplanned population growth in the City, and thus, would not necessitate new or altered fire protection facilities. Therefore, it is anticipated that the existing LAFD Station 40 would be able to adequately serve the Proposed Project. Although the Proposed Project could potentially result in a slight increase in demand for emergency service due to the new activities at the site, this increase is expected to be limited as operational activities would comply with State and City fire codes, standards, and regulations. As such, the Proposed Project would not result in the need for new or physically altered governmental facilities that would cause significant environmental impacts. Impacts would be less than significant, and this issue will not be addressed further in the EIR.

b. Police Protection?

No Impact. The Los Angeles Port Police (Port Police) provides the primary law enforcement and security for the Port including 7,500 acres along 43 miles of waterfront (POLA, 2023). The Port Police headquarters is located approximately 1.3 miles west of the Project site at 330 South Centre Street, Los Angeles. The Port Police Dive Unit facility boats and offices/ lockers are located approximately 1 mile southwest of the Project site at 954 South Seaside Avenue, Los Angeles. Additionally, the Los Angeles Police Department (LAPD) provides law enforcement for 21 community areas including San Pedro (LAPD, 2032). The Project site is located within the LAPD Harbor Division Area, which covers 27.5 square miles including Harbor City, Harbor Gateway, San Pedro, Wilmington, and Terminal Island (LAPD, 2021).

Similar to fire protection services, the Project site is already within the Port Police and LAPD service areas, and once operational, would continue to be served. As discussed in Section 5.14(a), the Proposed Project would not directly or indirectly induce unplanned population growth in the City, and therefore, would not increase the demand for new police protection services. As such, the Proposed Project would not increase the demand for police services, require the expansion of existing police facilities, or necessitate the construction of new police facilities. Therefore, no impact would occur, and this issue will not be addressed further in the EIR.

c. Schools?

No Impact. The need for new schools is generally associated with an increase in the school-aged population or a decrease in the accessibility and availability of existing schools. The additional employees hired for construction and operation of the Proposed Project would likely come from the local regional area, and any of the employees' school-age children would likely already attend schools in the vicinity. An increase in school-age children requiring public education is not expected to occur as a result of the Proposed Project. Therefore, no impacts to existing schools or need for new school facilities would occur, and this issue will not be addressed further in the EIR.

d. Parks?

No Impact. The Proposed Project would not develop new parks or reduce existing park facilities. Furthermore, the Project site would be confined to the Port and would not induce population growth that would increase demand for parks. Therefore, no impacts to existing parks, or the need for new parks would occur, and this issue will not be addressed further in the EIR.

e. Other Public Facilities?

No Impact. As previously discussed in Section 5.14(a), the Proposed Project does not include development that would induce substantial unplanned population growth that would increase the use of libraries, community centers, hospitals, or other public facilities. As such, a substantial increase in use of these public facilities is not anticipated. Therefore, no impacts on other public facilities would occur, and this issue will not be addressed further in the EIR.

5.16 RECREATION

Discussion:

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. An increased demand for neighborhood or regional parks and other recreational facilities is generally associated with an increase in permanent residents. As discussed in Section 5.14(a) the Proposed Project would not include the development of new residential facilities, and no substantial population growth would occur. As such, no increase in the use of existing neighborhood and regional parks or other recreational facilities is anticipated, and no substantial physical deterioration of existing facilities would occur. Therefore, no impacts would occur to recreational facilities, and this impact will not be addressed further in the EIR.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No Impact. The Proposed Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impacts would occur, and this impact will not be addressed further in the EIR.

5.17 TRANSPORTATION

Discussion:

The City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) (LADOT, 2022) requires a transportation assessment for development projects that meet the following criteria:

- If the Project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action.
- A transportation assessment is required by City ordinance or regulation.

The Proposed Project is expected to generate a net increase of 160 daily one-way vehicle trips as a result of employee commute trips, which is below LADOT's 250-trip threshold (Appendix A). However, in order to provide a conservative assessment of the potential impacts of the Proposed Project, a transportation assessment for the following criteria have been conducted in accordance with the LADOT TAG:

a. Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No Impact. The TAG states that a project that "generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent" and is not in conflict with applicable programs, plans, ordinances, or policies addressing the circulation system. The TAG provides a Plan Consistency Worksheet (Appendix A) to aid in determining whether the Proposed Project would have an impact; as seen in the completed Worksheet, the Proposed Project does not conflict with the City's circulation system policies, and therefore does not have an impact under this threshold.

b. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)(1)?

Less-than-Significant Impact. The intent of this threshold is to assess whether the Project causes substantial vehicle miles traveled (VMT). The TAG prescribes the use of the VMT Calculator developed by LADOT to determine if the employee work trip (commute trip) per employee would exceed 15 percent below the existing average work VMT per employee for the Area Planning Commission (APC) area in which the Project is located. In other words, is the Proposed Project's employee work trip per employee greater than 85 percent of the existing average work VMT per employee for the Harbor APC? The TAG identifies the Harbor APC VMT threshold as 12.3 daily work VMT per employee. The VMT Calculator does not

provide an estimate for daily work VMT for the anticipated 160 daily vehicle trips since it is below the 250 daily vehicle trip threshold. Therefore, the VMT Calculator was run with an assumption of more daily vehicle trips so that a daily work VMT per employee would be estimated for the Proposed Project's location by the VMT Calculator. With this assumption, the VMT Calculator estimates the Proposed Project to produce 11.0 daily work VMT per employee which is below the threshold for the Harbor APC. As such, the Proposed Project would have a less-than-significant impact for this criterion. A screenshot of the LADOT VMT Calculator is included as Appendix A.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves

No Impact. Impacts regarding the potential increase of hazards due to a geometric design feature relate to the design of access points to and from the Project site. The TAG provides the following screening criteria for this threshold; if the answer is "yes" to either of the following questions, further analysis would be required to assess whether the Project would cause a significant impact:

- Is the Project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?
- Is the Project proposing to make any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?

The Proposed Project does not include either of these changes, so the answer is "no" to both questions, and no impact would occur. This issue will not be addressed further in the EIR.

d. Result in inadequate emergency access?

No Impact. The Proposed Project would not alter or close existing roadways or access roads, or block emergency access points. LAHD will be constructing a rail grade separation roadway that will serve as the site access as a separate action. This grade separation is not part of the Proposed Project, as the modifications are required to allow for safe traffic patterns for current and future site usage. Emergency access would be unaffected by the Proposed Project, and no impact would occur. This issue will not be addressed further in the EIR.

5.18 TRIBAL CULTURAL RESOURCES

Discussion:

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

(i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or

No Impact. On December 8, 2022, the Native American Heritage Commission (NAHC) responded to the Port's request to conduct a Sacred Lands File search. The NAHC's Sacred Lands File search was negative. On January 5, 2023, the Port sent Assembly Bill 52 notification letters to California Native American Tribes with cultural affiliations with the Project site. One response for consultation was received on January 20, 2023, from the Gabrieleno Band of Mission Indians-Kizh Nation (Kizh Nation). The Port reached out to the Kizh Nation on February 21, 2023, to initiate consultation. During the correspondence, the Port informed the Kizh Nation that the Project was located entirely on artificial fill soil, and it was determined that no formal meeting was necessary, and consultation was concluded. Thus, no Tribal Cultural Resources were identified, and due to the unlikely chance of encountering significant prehistoric resources, no impact would occur. This issue will not be addressed further in the EIR.

(ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No Impact. As discussed in Section 5.18(a)(i), no Tribal Cultural Resources were identified, and the Project site has a low likelihood of containing significant prehistoric resources due to the man-made fill on site. No impact would occur, and this issue will not be addressed further in the EIR.

5.19 UTILITIES AND SERVICE SYSTEMS

Discussion:

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less-than-Significant Impact. The Project site is located on an unoccupied parcel that contains existing utility connections. The surrounding area is also highly developed and already served by utility providers. Paving of the Project site would result in increased impermeable surfaces that could increase the rate or volume of stormwater runoff. Additionally, operation of the offices and restrooms would generate wastewater. The buildings and restrooms would be connected to new sewer lines that would tie into the existing sewer system. The Proposed Project may also include installation of a LID water drainage capture system that would convey stormwater and dry-weather flows to the existing storm drainage system. The Project would not create excessive quantities of runoff or effluent, as water use on site would be limited to municipal water use in the office buildings and restrooms. Thus, the Proposed Project would not require expanded wastewater treatment. The Proposed Project would not substantially increase the rate or volume of stormwater runoff that would adversely affect the stormwater drainage system. Although additional

stormwater drainage systems would be installed, environmental effects would be insubstantial due to construction being limited to the Project site, which already contains an existing limited storm drain system. As such, the Proposed Project would not require any new or expanded wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities that could cause significant environmental effects. The Proposed Project would require electricity for lighting and equipment and connection to the municipal water supply. Site preparation would include installation of new utility systems to support the increased demand for electricity and municipal water. Although the Project constitutes an increased use in electricity, water, and wastewater treatment services, it would not substantially increase the area's population such that these service systems would require relocation or expansion. The site contains existing potable water and sanitary sewer connections. The existing power supply infrastructure would be adequate to serve the proposed uses, as the Los Angeles Department of Water and Power (LADWP) has an 8,019-megawatt electric capacity for the City of Los Angeles (LADWP, 2023). Therefore, the Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities that could cause significant environmental effects. Impacts would be less than significant, and this impact will not be addressed further in the EIR.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less-than-Significant Impact. The Proposed Project would require about 320,000 gallons of water for temporary grading, compacting, and dust suppression during construction. Water use during operations would consist of typical municipal water use in the office building, restrooms, and fire hydrants. Up to 80 operational employees would not substantially increase demand for water compared to the overall demand within the Port. Therefore, the Proposed Project would have a less-than-significant impact on water supplies. This impact will not be addressed further in the EIR.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less-than-Significant Impact. The Project site is serviced by the Los Angeles Sanitation and Environment (LASAN) Terminal Island Water Reclamation Plant (TIWRP). The TIWRP serves the Harbor Area (San Pedro, Harbor City, and Wilmington) in the City of Los Angeles and has the capability of treating up to 30 million gallons of municipal and industrial flows daily (LASAN, 2023a). The TIWRP currently treats an average of approximately 15 million gallons per day. The Proposed Project would include the operation of an office building and restrooms for employees, generating domestic wastewater that would be treated by LASAN. An estimated maximum of 60 workers is anticipated on any given day during construction, and a maximum of 80 employees is anticipated per day in one shift during operations. This increase in wastewater production would not be substantial given the TIWRP's treatment capacity. Additionally, as previously discussed in Section 5.14(a), the Proposed Project

would not directly or indirectly induce population growth in the area. Therefore, the Proposed Project would not exceed or substantially alter wastewater treatment requirements of the City's sewage collection and treatment system per the Los Angeles Municipal Code Industrial Waste Control Ordinance. Although the Project would be a new use at the existing unoccupied site, the TIWRP would have adequate capacity to treat the temporary wastewater generated during construction and permanent wastewater generated during operations. The Proposed Project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the Proposed Project's projected demand. Impacts would be less than significant, and this impact will not be addressed further in the EIR.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less-than-Significant Impact. The Proposed Project would temporarily generate solid waste associated with vegetation removal, grading and light excavation for utility installation. Construction would generate the majority of solid waste. This waste would be hauled and disposed of at a licensed waste disposal facility, permitted to accept the waste. Currently, known soil contaminants include various concentrations of TPH, VOCs, SVOCs, PAHs, metals, and PCBs that may require removal and disposal at an appropriate landfill (LAHD, 2017). Due to the presence of potentially hazardous existing fill on site, excavated soil is not anticipated to be recycled or reused and would be disposed of at a suitable waste disposal facility.

During operations, solid waste generated by the Proposed Project would be limited to trash from on-site employees as well as chassis repair operations (i.e., discarded broken parts) that would be adequately serviced by a landfill with sufficient permitted capacity. The Proposed Project would not generate solid waste in excess of State or local standards or impair solid waste reduction goals. Impacts would be less than significant, and this impact will not be addressed further in the EIR.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-than-Significant Impact. The Proposed Project would be required to conform to the policies and programs of the Solid Waste Integrated Resources Plan (SWIRP). The SWIRP proposes an approach for the City to achieve a goal of 90 percent solid waste diversion by 2025 (LASAN, 2022b). Compliance with the SWIRP would ensure sufficient permitted capacity to service the Proposed Project. As discussed in Section 5.19(d), solid waste associated with construction activities would be disposed of at a County of Los Angeles-approved waste disposal facility. The Proposed Project would comply with federal, state, and local statutes and regulations related to solid waste, as construction-generated waste would be disposed of at suitable facilities. More specifically, the Proposed Project would be compliant with all applicable codes pertaining to solid waste disposal. These codes include Chapter VI Article 6 Garbage, Refuse Collection of the LAMC, Part 13 Title 42 - Public Health and Welfare of the California Health and Safety Code, and Chapter 39 Solid Waste Disposal

- of the United States Code. The Proposed Project would also be compliant with AB 939, the California Solid Waste Management Act, which requires each city in the State to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. AB 341 builds upon AB 939 and requires jurisdictions to implement mandatory commercial recycling with a statewide 75 percent diversion rate from landfill disposal. The Proposed Project would implement and be consistent with the procedures and policies detailed in these codes, the City's recycling and solid waste diversion efforts, and related laws pertaining to solid waste disposal. Therefore, the impact would be less than significant, and this impact will not be addressed further in the EIR.

5.20 WILDFIRE

Discussion:

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. PRC Sections 4201-4204 direct the California Department of Forestry and Fire Protection to map fire hazard based on relevant factors such as fuels, terrain, and weather. The Port is not located in or near a state responsibility area or lands classified as a Very High Fire Severity Zone within its Local Responsibility Area (CAL FIRE, 2023). Additionally, as discussed in Section 5.9(g), the Port and Project area are listed as "not burnable" on the US Forest Service Wildfire Hazard Potential website (USFS, 2023). Therefore, the Project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. No impacts would occur, and this issue will not be addressed further in the EIR.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

Discussion:

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less-than-Significant Impact. As discussed in Section 5.4, Biological Resources, the Project site is heavily disturbed and supports little wildlife or native plant habitat, and no special-status wildlife species were observed during surveys conducted in 2023. No listed, candidate, sensitive, or special-status plant species are known to occur on the Project site, and there is no habitat that would support such species within the Project site. No other special-status wildlife or plant species have potential to occur within or adjacent to the Project area based on known ranges, habitat preferences, and records from the California Natural Diversity Database. LAHD would conduct pre-construction surveys for nesting birds as part of the Proposed Project and in compliance with State and federal laws protecting nesting birds. Pre-construction surveys for nesting birds would minimize potential impacts to nesting birds that may occur on the site. Construction activities would comply with the MBTA and Fish and Game Code to avoid disturbing any active nests on site.

As discussed in Sections 5.4(b) and 5.4(c), although two “freshwater ponds,” and one “lake” were observed on site, they were determined not to be jurisdictional waters. Mulefat thickets were not reliable hydrology indicators because they were also present in uplands areas, and no hydric soils or primary or secondary indicators of hydrology were observed. Therefore, Project activities would not require permits under Sections 401 or 404 of the Clean Water Act and Porter-Cologne Water Quality Control Act, Fish and Game Code Section 1600 *et seq.*, or California Coastal Commission (LAHD, 2023). Impacts to State or federally protected wetland habitat would not occur. This issue will not be addressed further in the EIR.

The Proposed Project would involve ground disturbing activities. The area being developed has been previously disturbed and is underlain by harbor dredged and industrial-grade fill. As discussed in Section 5.5, Cultural Resources, cultural resources records search did not identify any reports of present historically eligible or listed resources at the Project site. Therefore, no impact would occur related to the elimination of examples of major periods of California history or prehistory.

b. Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Potentially Significant Impact. As discussed in Section 5, Environmental Analysis, the Proposed Project may have potentially significant impacts to Air Quality, Energy, Greenhouse Gas Emissions, and Hazards and Hazardous Materials. These potentially significant impacts of the Proposed Project would be potentially cumulatively considerable. Generally, contributions to air quality and greenhouse gas emissions impacts are cumulative due to the regional and global nature of air pollution and climate change, respectively. As described in Sections 5.3, Air Quality, and 5.8, Greenhouse Gas Emissions, the Proposed Project would have potentially significant impacts to these issue areas. Therefore, the Proposed Project would potentially have a cumulatively considerable impact regarding these issues, and cumulative impacts will be evaluated further in the EIR.

c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As discussed in Section 5.21(b), the Proposed Project may have potentially significant impacts to Air Quality, Energy, Greenhouse Gas Emissions, and Hazards and Hazardous Materials that may constitute an adverse direct or indirect effect on human beings. These potentially significant impacts will be analyzed further in the EIR.

6.0 PREPARERS AND CONTRIBUTORS

Per State CEQA Guidelines Section 15063(d)(6), this Initial Study was prepared by LAHD with assistance by Aspen Environmental Group. Members of the professional staff are listed below.

6.1 LOS ANGELES HARBOR DEPARTMENT

- Lisa Wunder, Acting Director of Environmental Management
- Nicole Enciso, Marine Environmental Supervisor, CEQA
- Jeremy Silva, Planning Assistant, CEQA
- Rita Brenner, Marine Environmental Supervisor, Site Restoration
- Pauling Sun, Environmental Specialist, Site Restoration
- Kat Prickett, Marine Environmental Supervisor, Water
- Andrew Jirik, Environmental Specialist, Water
- Christopher Morton, Civil Engineering Associate, Engineering
- Geraldine Shimabukuro, Senior Civil Engineer, Engineering
- Kerry Cartwright, Director, Goods Movement
- Shozo Yoshikawa, Transportation Engineer, Goods Movement
- Michael Keenan, Harbor Planning and Research Director, Planning and Strategy
- Derek Jordan, Harbor Planning and Research Assistant Director, Planning and Strategy

6.2 ASPEN ENVIRONMENTAL GROUP TEAM

- Lisa Blewitt – Project Manager
- Brewster Birdsall, P.E. – Air Quality, Energy, GHG, Noise
- Rachael Dal Porto – Air Quality, Energy, GHG
- Justin Wood – Biological Resources
- Lauren DeOliveira – Cultural Resources, Tribal Cultural Resources
- Aurie Patterson – Geology and Soils, Hazards and Hazardous Materials
- Stephanie Tang – Aesthetics, Hydrology and Water Quality, Utilities and Service Systems, Wildfire, Mandatory Findings of Significance
- Jeanne Ogar – Land Use and Planning
- Avery Robinson – Agriculture and Forestry Resources, Mineral Resources, Population and Housing, Public Services, Recreation

This Page Intentionally Left Blank

7.0 REFERENCES

ALUC (Los Angeles County Airport Land Use Commission). 2004. Los Angeles County Airport Land Use Plan. Accessed June 2023. https://planning.lacounty.gov/wp-content/uploads/2022/10/Los-Angeles-County-Airport-Land-Use-Plan.pdf.

CAL FIRE (California Department of Forestry and Fire Protection). 2023. FHSZ Viewer. Accessed June 2023. https://egis.fire.ca.gov/FHSZ/.

Caltrans (California Department of Transportation). 2020. Transportation and Construction Vibration Guidance Manual. April. Accessed June 23, 2023. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

_____. 2023. California State Scenic Highway System Map. Accessed June 2023. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

CGS (California Geological Survey). 2023. Regulatory Maps Geo Application. Accessed June 2023. https://maps.conservation.ca.gov/cgs/EQZfApp/app/.

City of Los Angeles. 1998. Noise Element of the Los Angeles City General Plan. Accessed June 23, 2023. https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf.

_____. 2001. Conservation Element of the City of Los Angeles General Plan. Accessed June 27, 2022. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

_____. 2006. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles. Accessed June 23, 2023. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf.

_____. 2016. Mobility Plan 2035 An Element of the General Plan. Accessed June 27, 2023. https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf.

_____. 2021. Housing Element of the City of Los Angeles General Plan. Accessed June 20, 2023. https://planning.lacity.org/odocument/bde50bc0-5f1f-4e88-a5cf-06a12e1d8078/Chapter_1_-_Housing_Needs_Assessment_(Adopted).pdf.

_____. 2023a. ZIMAS. Accessed June 22, 2023. https://zimas.lacity.org/.

_____. 2023b. Los Angeles Municipal Code. Accessed June 20, 2023. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-111886.

City of Rancho Palos Verdes. 2019. Final Natural Community Conservation Plan (NCCP) and Habitat Conservation Plan (HCP). Accessed June 27, 2023. https://rpvca.gov/DocumentCenter/View/17121/NCCPHCP.

DOC (California Department of Conservation). 2022. California Important Farmland Finder. Accessed June 20, 2023. https://maps.conservation.ca.gov/dlrp/ciff/.

_____. 2023a. Williamson Act Program Overview. Accessed June 20, 2023. https://www.conservation.ca.gov/dlrp/wa#:~:text=About%20the%20Williamson%20Act%E2%80%8B,or%20related%20open%20space%20use.

_____. 2023b. Well Finder CalGEM GIS. Accessed June 20, 2023. https://maps.conservation.ca.gov/doggr/wellfinder/.

_____. 2023. Tsunami Hazard Area Map, Los Angeles County; produced by the California Geological Survey and the California Governor's Office of Emergency Services; mapped at multiple scales. Accessed June 28, 2023. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles.

DTSC (Department of Toxic Substances Control). 2007. Final Site Inspection Report, for the Former Naval Air Base-Terminal Island, Los Angeles County, California. Accessed June 2023. https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fdeliverable_documents%2F9458890616%2FLetter%20-%20Final%20SI%20Rp%20Terminal%20Island.pdf

_____. 2023. Envirostor website, Naval Airbase (80001049). Accessed June 2023. https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=80001049.

FEMA (Federal Emergency Management Agency), 2021. FEMA Flood Map Service Center. Accessed June 28, 2023. https://msc.fema.gov/portal/search?AddressQuery=740%20Terminal%20way%2C%20San%20Pedro#searchresultsanchor.

FHWA (Federal Highway Administration). 2006. FHWA Highway Construction Noise Handbook. Final Report. August. Accessed June 23, 2023. https://www.fhwa.dot.gov/Environment/noise/construction_noise/handbook/.

LADCP (Los Angeles Department of City Planning). 2017. San Pedro Community Plan. October. Accessed June 20, 2023. https://planning.lacity.org/odocument/ee5aaccb-fce7-4dc2-9f91-2df177a48417/San_Pedro_Community_Plan.pdf.

LADOT (Los Angeles Department of Transportation). 2022. Transportation Assessment Guidelines. August. Accessed October 19, 2023. 2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf (lacity.org).

LADWP (Los Angeles Department of Water and Power). 2023. About Us. Accessed August 2, 2023. https://www.ladwpnews.com/about-us/.

LAFD (Los Angeles Fire Department). 2023. Find Your Station. Accessed June 20, 2023. https://lafd.org/fire-stations/station-results.

LAHD (Los Angeles Harbor Division). 2017. Environmental Baseline Investigation, Former LAXT Remote Storage Area & Customs Building Property, 300 S. Ferry Street & 750 Eldridge Street, Terminal Island, California 90731. Prepared for City of Los Angeles Harbor Department Environmental Management Division, APP 050930-549 H. Prepared by Pacific Edge Engineering, Inc. November 3. PDF.

_____. 2018. Port Master Plan. September. Accessed June 20, 2023. https://kentico.portoflosangeles.org/getmedia/adf788d8-74e3-4fc3-b774-c6090264f8b9/port-master-plan-update-with-no-29_9-20-2018.

_____. 2023. Port of Los Angeles Terrestrial Biological Characterization Survey – LAXT Loop. Prepared by Rincon Consultants, Inc. April.

LAPD (Los Angeles Police Department). 2021. Harbor Division Map. Accessed June 20, 2023. https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/03/HARB 11x17.pdf.

_____. 2023. LAPD Organization Chart. Accessed June 20, 2023. https://www.lapdonline.org/lapd-organization-chart/.

LASAN (Los Angeles Sanitation and Environment). 2023. Terminal Island Water Reclamation Plant. Accessed June 28, 2023. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tiwrp?_adf.ctrl-state=8cih3ctnn_755&_afrLoop=292082652391834#!.

_____. 2023c. Solid Waste Integrated Resources Plan (SWIRP). Accessed June 29, 2023. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=20106575683104040&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=2gx54ew1m_143#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D201065756831040 40%26_afrWindowMode%3D0%26_adf.ctrl-state%3D2gx54ew1m_147.

Moffatt & Nichol, 2007. Tsunami Hazard Assessment for the Ports of Long Beach and Los Angeles. Final Report. Prepared for the Port of Long Beach and Port of Los Angeles. M&N File No. 4839-169. April 2007.

POLA (Port of Los Angeles). 2023. About the Los Angeles Port Police. Accessed June 20, 2023. https://www.portoflosangeles.org/community/los-angeles-port-police.

USACE (United States Army Corps of Engineers). 2006. Final Technical Project Planning Memorandum and Associated Documentation in Support of FUDS MMRP Site Inspections Project: Former Naval Air Base – Terminal Island, Los Angeles County, California. Accessed June 2023. https://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=80001049&doc_id=5009403.

USFS (United States Forest Service). 2023. Wildfire Hazard Potential, Version 2020 Image Service. https://usfs.maps.arcgis.com/apps/mapviewer/index.html?layers=55226e8547f84aae8965210a9801c357. Accessed June 2023.

USFWS (United States Fish and Wildlife Service). 2023. Environmental Conservation Online System (ECOS). Habitat Conservation Plans. [Online]: https://ecos.fws.gov/ecp/report/conservation-plans-region-summary?region=8&type=HCP. Accessed June 2023.

USGS (United States Geological Survey). 2023a. U.S. Quaternary Fault and Fold Database of the United States Interactive website. Accessed June 2023. https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf.

_____. 2023b. Areas of Land Subsidence in California. Accessed June 2023. https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html.

This Page Intentionally Left Blank

Appendix A

Los Angeles Department of Transportation – Transportation Assessment Guidelines Plan Consistency Worksheet

This Page Intentionally Left Blank

Proposed Project - 80 employees

CITY OF LOS ANGELES VMT CALCULATOR Version 1.4

Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: LAXT loop MSF

Scenario:

Address: 33.747318, -118.257315

Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?

○ Yes ○ No

Existing Land Use

Land Use Type	Value	Unit
Housing | Single Family		DU

☐ Click here to add a single custom land use type (will be included in the above list)

Proposed Project Land Use

Land Use Type	Value	Unit
Housing | Single Family		DU
(custom) Marine Support Facility | Daily	160	Trips
(custom) Marine Support Facility | HBW-Attrac	50	Percent
(custom) Marine Support Facility | HBO-Attract	0	Percent
(custom) Marine Support Facility | NHB-Attract	0	Percent
(custom) Marine Support Facility | HBW-Produ	50	Percent
(custom) Marine Support Facility | HBO-Produ	0	Percent
(custom) Marine Support Facility | NHB-Produc	0	Percent
(custom) Marine Support Facility | Daily	0	Residents
(custom) Marine Support Facility | Daily	80	Employees
(custom) Marine Support Facility | Daily	Non-Retai	Retail/Non-Re

☑ Click here to add a single custom land use type (will be included in the above list)

Project Screening Summary

Existing Land Use	Proposed Project
0 Daily Vehicle Trips	140 Daily Vehicle Trips
0 Daily VMT	1,595 Daily VMT

Tier 1 Screening Criteria

Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. ☐

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips	140 Net Daily Trips
The net increase in daily VMT ≤ 0	1,595 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf

The proposed project is not required to perform VMT analysis.

Measuring the Miles

11/8/2023

Conservative Analysis: Daily Trips >250 to Estimate Work VMT per Employee

CITY OF LOS ANGELES VMT CALCULATOR Version 1.4

Project Information

Project: LAXT loop MSF

Scenario:

Address: 33.747318, -118.257315

Proposed Project Land Use Type	Value	Unit
(custom) Marine Support Facility | Retail/Non-F	Non-Retai	LU type
(custom) Marine Support Facility | Residents	0	Person
(custom) Marine Support Facility | Employees	154	Person
(custom) Marine Support Facility | Daily	462	Trips
(custom) Marine Support Facility | HBW-Attrac	33	Percent
(custom) Marine Support Facility | HBO-Attract	17	Percent
(custom) Marine Support Facility | NHB-Attract	0	Percent
(custom) Marine Support Facility | HBW-Produ	33	Percent
(custom) Marine Support Facility | HBO-Produ	17	Percent
(custom) Marine Support Facility | NHB-Produc	0	Percent

TDM Strategies

Select each section to show individual strategies
Use ☑ to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

	Proposed Project	With Mitigation
Max Home Based TDM Achieved?	No	No
Max Work Based TDM Achieved?	No	No

A Parking

Reduce Parking Supply ☐ Proposed Prj ☐ Mitigation
- 100 city code parking provision for the project site
- 74 actual parking provision for the project site

Unbundle Parking ☐ Proposed Prj ☐ Mitigation
- 175 monthly parking cost (dollar) for the project site

Parking Cash-Out ☐ Proposed Prj ☐ Mitigation
- 50 percent of employees eligible

Price Workplace Parking ☐ Proposed Prj ☐ Mitigation
- 6.00 daily parking charge (dollar)
- 50 percent of employees subject to priced parking

Residential Area Parking Permits ☐ Proposed Prj ☐ Mitigation
- 200 cost (dollar) of annual permit

B Transit

C Education & Encouragement

D Commute Trip Reductions

E Shared Mobility

F Bicycle Infrastructure

G Neighborhood Enhancement

Analysis Results

Proposed Project	With Mitigation
417 Daily Vehicle Trips	417 Daily Vehicle Trips
4,423 Daily VMT	4,423 Daily VMT
0.0 Household VMT per Capita	0.0 Household VMT per Capita
11.0 Work VMT per Employee	11.0 Work VMT per Employee

Significant VMT Impact?

Proposed Project	With Mitigation
Household: No Threshold = 9.2 15% Below APC	Household: No Threshold = 9.2 15% Below APC
Work: No Threshold = 12.3 15% Below APC	Work: No Threshold = 12.3 15% Below APC

Measuring the Miles

8/14/2023

Scoping Comments

This Page Intentionally Left Blank

From:	abel alvarez
To:	Ceqacomments
Subject:	Terminal Island Maritime Support Facility
Date:	Wednesday, January 17, 2024 8:05:25 PM

Im reaching out to you guys as a S.A. recycle employee to tell you guys that terminal island is needed because it helps by getting the unneeded material out, Also the city would benefit of it in many ways. People also rellly on the island for their Jobs many being there many years. For those reasons I would like to vote for the terminal island to Stay. Thanks

From:	Sam Wang
To:	Ceqacomments
Subject:	South Coast AQMD Staff's Comments on Notice of Preparation of a Draft Environmental Impact Report for the Terminal Island Maritime Support Facility Project
Date:	Tuesday, January 23, 2024 12:09:02 AM
Attachments:	LAC231212-04 NOP Terminal Island Maritime Support Facility Project#.pdf

Dear Mr. Silva,

Attached are South Coast AQMD staff's comments on Notice of Preparation of a Draft Environmental Impact Report for the Terminal Island Maritime Support Facility Project (South Coast AQMD Control Number: LAC231212-04). Please contact me if you have any questions regarding these comments.

Regards,
Sam

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
(909) 396
swang1@aqmd.gov

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
ceqacomments@portla.org
Jeremy Silva, Planning Assistant
The Port of Los Angeles
425 S. Palos Verdes Street
P.O. Box # 151
San Pedro, CA 90733-0151

January 22, 2024

Notice of Preparation of a Draft Environmental Impact Report for the Terminal Island Maritime Support Facility Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.
[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA ***operational*** thresholds to determine the level of significance.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,[5] South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,[6] and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.[7].

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW
LAC231212-04
Control Number

[5] https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

[6] South Coast AQMD's 2022 Air Quality Management Plan can be found at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan (Chapter 4 - Control Strategy and Implementation).

[7] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

Marcos Holguin (Boardroom Local 94): Question – Has the Port identified an operator for this project yet?

Terminal Island Maritime Support Facility Project

From: Doug Corbett <doug@chassissystems.com>
Sent: Tuesday, January 16, 2024 11:51 AM
To: Ceqacomments
Subject: 740 Terminal Way-Vertical Chassis Storage
Attachments: 4,000 chassis @BNSF LPC.pdf; 4,000 Chassis @ BNSF.pdf; Chassis Racks BNSF #3.pdf; acre.pdf; portable rack plan.pdf

Hi, I wanted to introduce our Vertical Chassis storage system. This is the same product used by BNSF at their Los Angeles Commerce main yard.

Our Vertical Chassis Racks store 9 empty container chassis in the area of one parking stall. This is over 725 chassis per acre of paving. The rack system also allows sorting and organizing large groups of chassis for faster access to a specific chassis. It also helps accommodate multiple users on the site.

Our product will increase the capacity of the proposed project. A rough maximum chassis capacity is proposed 3600 parking capacity x 9 per space = 32,400 chassis possible. The current design is a movable rack that does not require foundations (no terminal modifications needed).

The environment benefit of higher chassis density gets the most value out of the proposed project, and saves enough space to allow other uses (such as empty containers storage) on the site.

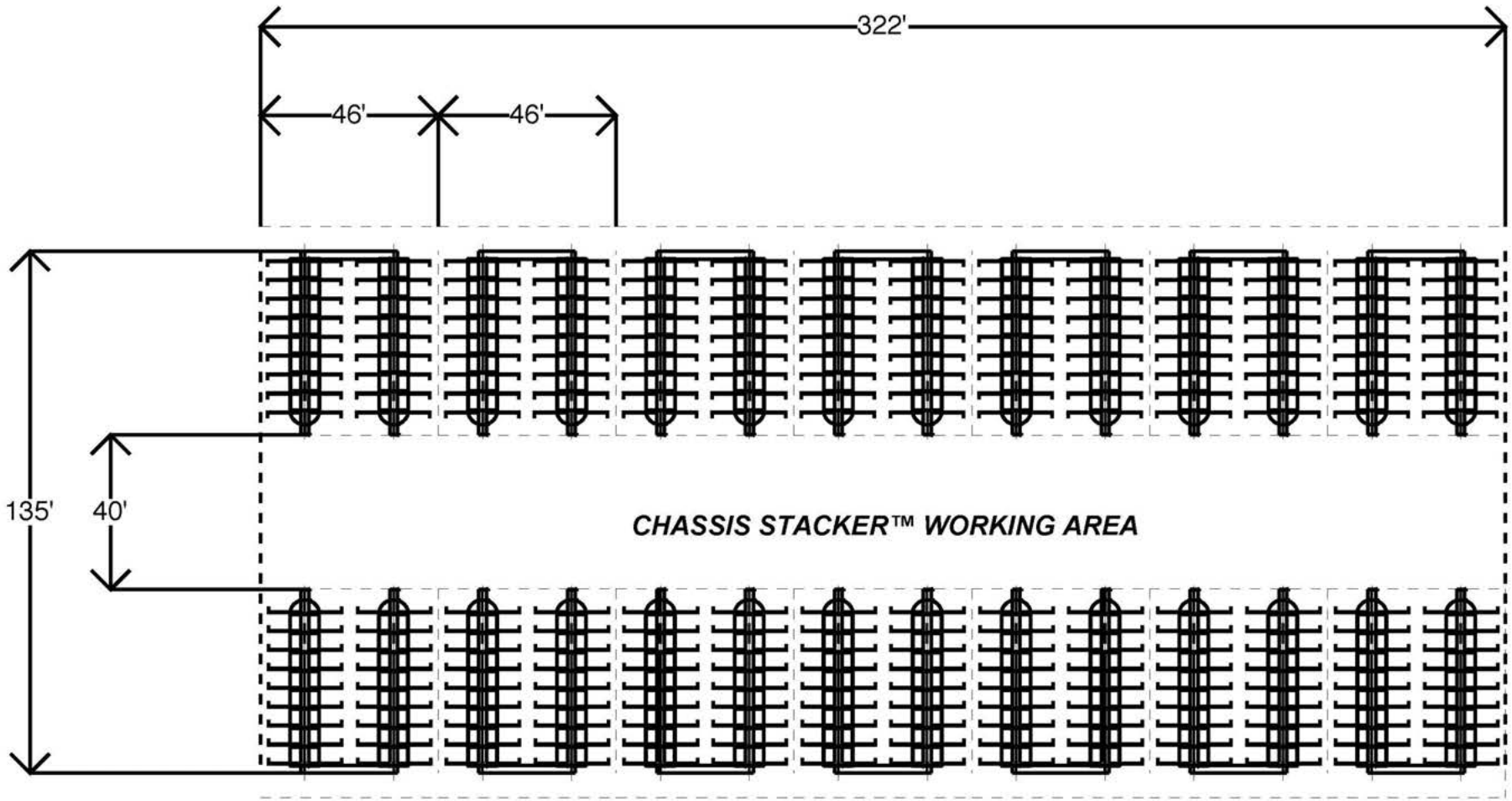
Here are some more photos and drawings of our product. I hope the Port will consider the benefits. Let me know if any interest.

Regards,
Chassis Systems, Inc.
Doug Corbett
President
503-641-0343
doug@chassissystems.com

HYUNDAI
04/11/2008

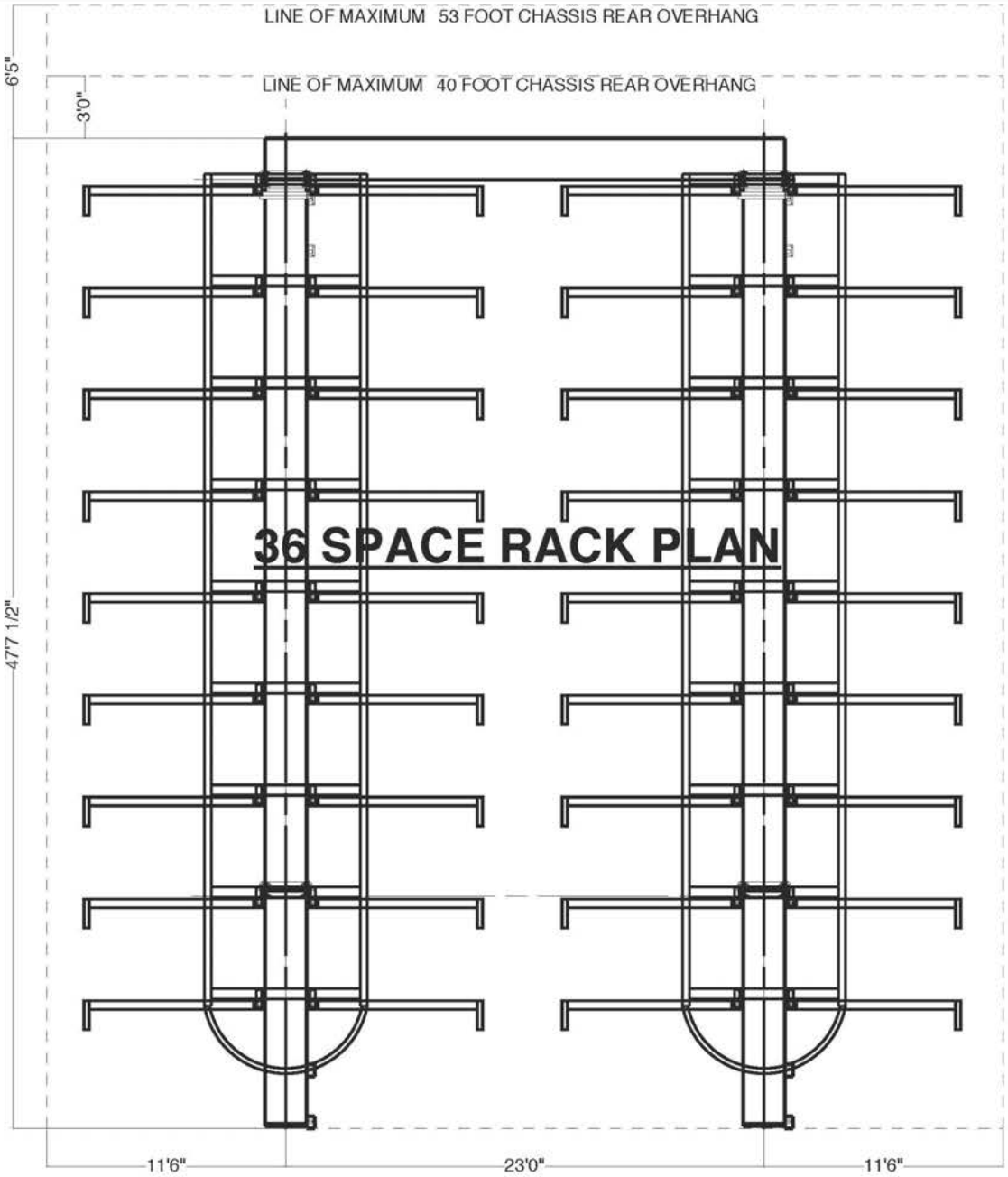
04/11/2008

MAERSK SEALAND
APMU 415218
WT 0800
TAYLOR
TAYLOR
C R
80
A B
MAERSK



135' x 322' = 43,470 sq. ft.
14 UNITS = 28 RACKTOPS = 504 CHASSIS (20-53FT)

CHASSIS SYSTEMS, INC. (503) 641-0343
www.chassissystems.com



36 SPACE RACK PLAN

DRAWN DCC 5/4/06
SCALE 1/8" = 1'-0"

CHASSIS SYSTEMS, INC. (503)641-0343 www.chassissystems.com

Public Scoping Meeting for the Terminal Island Maritime Support Facility
January 9, 2024

WEBVTT

1

00:00:14.420 --> 00:00:20.700

Nicole Enciso: Good afternoon, everyone. We'll go ahead and wait a few moments for folks to join, and then we'll get started.

2

00:00:22.600 --> 00:01:00.500

Spn Interp Eduardo Kogan: Buenas tardes a todos. Gracias por unirse a la reunion del dia de hoy.

Vamos a esperar unos minutitos para que sigan en la gente y vamos a comenzar para aquellos que necesitan interpretacion en espanol. Se va a activar una function donde van a ver dos cartelito bien pequenos en la parte baja en la parte inferior de la pantalla en la cual puede oprimir espanol o ingles. Prima espanol y van a escuchar esta presentacion simultanea en espanol tambien.

3

00:01:00.510 --> 00:01:02.870

Spn Interp Eduardo Kogan: Por favor si pueden poner en mudo o silenciar

4

00:01:02.880 --> 00:01:06.570

Spn Interp Eduardo Kogan: el audio original. Muchas gracias.

5

00:01:07.440 --> 00:01:08.340

Spn Interp Eduardo Kogan: Thank you.

6

00:01:10.810 --> 00:01:15.099

Nicole Enciso: Thank you, Eduardo. That was just giving some instructions for the Spanish Channel.

7

00:01:24.120 --> 00:01:37.450

Nicole Enciso: Since we do have Spanish translation available, those of us who would like to listen in English if you'd go ahead and click that interpretation, icon, and join the English Channel that will allow for you to hear any translation that may come through later.

8

00:01:49.640 --> 00:01:56.849

Nicole Enciso: So we will go ahead and get started with this presentation. Welcome, everyone. My name is Nicole Enciso.

9

00:01:56.920 --> 00:02:03.630

Nicole Enciso: and I'm the Marine Environmental Supervisor over the CEQA/NEPA team in the Environmental Management Division at the Port of LA.

10

00:02:04.350 --> 00:02:10.800

Nicole Enciso: This is the Terminal Island maritime support facility project notice of preparation and initial study

11

00:02:10.919 --> 00:02:14.330

Nicole Enciso: public scoping meeting. next slide.

12

00:02:19.540 --> 00:02:33.060

Nicole Enciso: Here we have a brief agenda of what we'll be going over today. The first item will be going over the California Environmental Quality Act or Ceqa process. We'll then move on to the presentation of the proposed project.

13

00:02:33.810 --> 00:02:36.790

Nicole Enciso: Then we'll move to the Nopis determinations.

14

00:02:37.240 --> 00:02:40.579

Nicole Enciso: We'll also have the opportunity for public comments.

15

00:02:40.860 --> 00:02:44.320

Nicole Enciso: And then we'll have closing remarks. Next slide

16

00:02:48.340 --> 00:02:56.430

Nicole Enciso: Again, this is the public scoping meeting for the Terminal Island maritime support facility project. Once we do open up the comment

17

00:02:56.480 --> 00:03:00.969

Nicole Enciso: Portion of this meeting, oral comments will be limited to 3 min each.

18

00:03:01.010 --> 00:03:06.580

Nicole Enciso: and Spanish interpretation is available by clicking on the interpretation icon at the bottom of the screen.

19

00:03:07.470 --> 00:03:15.600

Nicole Enciso: Written public comments for this project will be accepted via mail or email until January 22nd, 2024

20

00:03:16.590 --> 00:03:23.039

Nicole Enciso: comments should be limited to the environmental issues related to the proposed project as disclosed in the Nopis.

21

00:03:23.350 --> 00:03:27.380

Nicole Enciso: and as a reminder all comments received will be part of the public record.

22

00:03:28.720 --> 00:03:30.160

Nicole Enciso: Next slide.

23

00:03:33.310 --> 00:03:44.449

Nicole Enciso: This is an overview of the Ceqa process, and where we are today. The first step is the notice of preparation and initial study which was released on December 7th.

24

00:03:44.850 --> 00:03:58.169

Nicole Enciso: That item is out for public review and comment for a period of 45 days, and during that time we had a scoping meeting to inform the public of the proposed project, and that's where we are today.

25

00:03:58.740 --> 00:04:08.999

Nicole Enciso: Comments received will be considered when preparing the draft EIR. And once finalized, that draft EIR will be put out for public comment once more.

26

00:04:09.400 --> 00:04:12.769

Nicole Enciso: During that time we'll have another public meeting

27

00:04:12.900 --> 00:04:23.380

Nicole Enciso: to provide opportunity to hear verbally the proposed project, and provide comment. And all comments will then be considered and incorporated into the final Eir

28

00:04:23.730 --> 00:04:27.740

Nicole Enciso: before it is brought to our Board of Harbor Commissioners

29

00:04:27.970 --> 00:04:29.520

Nicole Enciso: for consideration.

30

00:04:31.410 --> 00:04:32.480

Nicole Enciso: Next slide.

31

00:04:35.870 --> 00:04:41.730

Nicole Enciso: as mentioned, the Nopis for the proposed project was released on December 7,

32

00:04:41.940 --> 00:04:43.289

Nicole Enciso: 2023.

33

00:04:44.360 --> 00:04:49.050

Nicole Enciso: The document can be found on the port's website at WWW

34

00:04:49.060 --> 00:04:52.680

Nicole Enciso: Dot, port of Los angeles.org forward slash ceqa.

35

00:04:54.000 --> 00:05:00.089

Nicole Enciso: The Harbor Department is holding this public scoping meeting to provide the public information about the proposed project.

36

00:05:00.780 --> 00:05:07.159

Nicole Enciso: offer the public an opportunity to provide input on environmental issues raised in the NOP/IS

37

00:05:07.730 --> 00:05:17.580

Nicole Enciso: and discuss potential alternatives to consider in the draft EIR. written comments will be accepted until Monday, January 22nd, 2024.

38

00:05:18.390 --> 00:05:19.320

Nicole Enciso: Next slide.

39

00:05:22.410 --> 00:05:30.819

Nicole Enciso: This slide is showing you a overview of where the proposed project is located in the context of the port of Los Angeles complex.

40

00:05:33.780 --> 00:05:34.920

Nicole Enciso: Next slide.

41

00:05:37.310 --> 00:05:41.929

Nicole Enciso: This slide is showing the draft conceptual plan for the proposed project.

42

00:05:42.100 --> 00:05:51.679

Nicole Enciso: The access roadway shown is not a part of the proposed project, and is a separate project under CEQA, but is being shown here as a potential

43

00:05:51.790 --> 00:05:54.639

Nicole Enciso: future access point for the proposed project.

44

00:05:56.090 --> 00:06:01.539

Nicole Enciso: and the proposed project also includes the office building shown at the top of the slide.

45

00:06:02.870 --> 00:06:03.850

Nicole Enciso: Next slide.

46

00:06:07.090 --> 00:06:15.570

Nicole Enciso: The project proposes to construct and operate a new chassis support facility on an 80 acre site located at 740 terminal way.

47

00:06:16.200 --> 00:06:22.540

Nicole Enciso: The facility would be a full service depot to provide storage, maintenance, and repairs of chassis.

48

00:06:22.830 --> 00:06:25.539

Nicole Enciso: refurbishment of the nearby office facility.

49

00:06:26.560 --> 00:06:41.000

Nicole Enciso: It would increase efficiency at container terminals through storing chassis at off-site adjacent properties ancillary use of this facility could also be for the storage of empty cargo containers stacked up to 5 high.

50

00:06:41.920 --> 00:06:49.109

Nicole Enciso: and would also construct electric charging infrastructure to support the energy demand of on-site equipment

51

00:06:49.130 --> 00:06:53.860

Nicole Enciso: and to meet the clean air action plan or CAAP zero emission goals by 2030

52

00:06:54.450 --> 00:06:55.430

Nicole Enciso: next slide

53

00:06:58.990 --> 00:07:05.120

Nicole Enciso: project objectives are included on this slide. But there are more in the environmental document itself.

54

00:07:05.660 --> 00:07:20.470

Nicole Enciso: These include optimizing the use of existing land to support chassis storage at the project site. Reducing container dwell time. Reducing container terminal visit time. And idling due to eliminated chassis retrieval on terminal

55

00:07:21.250 --> 00:07:23.690

Nicole Enciso: reducing inefficient chassis trips.

56

00:07:24.670 --> 00:07:32.289

Nicole Enciso: reduce double handling of empty containers at terminals in the port of LA and port of Long Beach

57

00:07:32.920 --> 00:07:38.399

Nicole Enciso: meet the CAAP's zero emission cargo handling equipment goal by January 1st, 2030,

58

00:07:38.970 --> 00:07:48.030

Nicole Enciso: and increase the efficiency of good movement in the port by providing off-terminal maritime support to help meet the current and future demands of marine terminals.

59

00:07:49.300 --> 00:07:50.330

Nicole Enciso: Next slide

60

00:07:52.840 --> 00:08:02.110

Nicole Enciso: facility construction would include modifying the interior of an approximately 2,900 square foot office building at 750 Eldridge Street.

61

00:08:02.720 --> 00:08:07.489

Nicole Enciso: and would install 2 office trailers approximately 10 foot by 40 foot.

62

00:08:07.850 --> 00:08:13.780

Nicole Enciso: 4 corrugated metal maintenance and repair facilities. a roadability canopy

63

00:08:14.170 --> 00:08:17.880

Nicole Enciso: of 16,000 square feet and 30 feet tall.

64

00:08:18.050 --> 00:08:28.759

Nicole Enciso: with a concrete foundation. 2 restroom buildings. 2 guard booths. Approximately 40 high mass light poles up to a hundred feet tall.

65

00:08:29.840 --> 00:08:33.440

Nicole Enciso: approximately 7,000 linear feet of chain link fencing

66

00:08:34.370 --> 00:08:37.310

Nicole Enciso: pave 75 acres of the 80 acre site.

67

00:08:38.900 --> 00:08:44.709

Nicole Enciso: charging and fueling infrastructure as well as storm water, drainage, and sewage systems.

68

00:08:45.770 --> 00:08:46.750

Nicole Enciso: Next slide

69

00:08:49.690 --> 00:08:58.060

Nicole Enciso: facility operations would be those of a chassis support depot, which would include storage, maintenance, and repair of chassis.

70

00:08:58.700 --> 00:09:13.940

Nicole Enciso: who would employ approximately 80 individuals. And there could be up to 4 different operators that could operate the facility at one time with up to 3,200 truck trips per day under opening day conditions in 2027

71

00:09:14.520 --> 00:09:20.550

Nicole Enciso: and up to 5,900 truck trips projected under 2046 conditions.

72

00:09:21.460 --> 00:09:26.219

Nicole Enciso: Again, ancillary use of the space could be for storage of empty containers

73

00:09:26.300 --> 00:09:29.029

Nicole Enciso: which could be stacked up to 5 containers high.

74

00:09:29.380 --> 00:09:35.139

Nicole Enciso: and a hundred percent of the yard equipment would be zero emission by January 1st, 2030.

75

00:09:35.390 --> 00:09:36.510

Nicole Enciso: Next slide.

76

00:09:39.930 --> 00:09:46.899

Nicole Enciso: This slide summarizes the CEQA issues that were determined to have no impact or less than significant impact

77

00:09:47.450 --> 00:09:50.419

Nicole Enciso: through the initial study analysis.

78

00:09:51.660 --> 00:09:55.870

Nicole Enciso: These impact areas are aesthetics.

79

00:09:55.980 --> 00:10:08.009

Nicole Enciso: agriculture and forestry resources. biological resources. cultural resources. geology and soils. hydrology and water quality

80

00:10:08.760 --> 00:10:12.920

Nicole Enciso: land use and planning. mineral resources.

81

00:10:14.050 --> 00:10:15.140

Nicole Enciso: noise

82

00:10:16.300 --> 00:10:29.570

Nicole Enciso: population and housing. public services. recreation. transportation and traffic. utilities and service systems. and wildfire.

83

00:10:30.470 --> 00:10:35.319

Nicole Enciso: These resource areas will not be evaluated further in the draft environmental impact report.

84

00:10:36.220 --> 00:10:37.169

Nicole Enciso: Next slide.

85

00:10:39.610 --> 00:10:45.239

Nicole Enciso: this slide is summarizing the CEQA issues that will be analyzed further in the draft EIR.

86

00:10:45.560 --> 00:10:54.410

Nicole Enciso: they were analyzed and determined to result in potentially significant impacts. For at least one of the significance criterion in the Ceqa checklist.

87

00:10:54.660 --> 00:11:08.330

Nicole Enciso: And those areas are air quality. energy. greenhouse gas emissions, and hazards and hazardous materials. Again, these resource areas will be analyzed in more depth in the draft EIR.

88

00:11:12.330 --> 00:11:16.510

Nicole Enciso: so we have now reached the portion of the meeting for our public comments.

89

00:11:16.840 --> 00:11:19.770

Nicole Enciso: Speakers will be given 3 min to speak.

90

00:11:20.350 --> 00:11:24.959

Nicole Enciso: If you wish to speak, please press the raise hand button to provide verbal comments.

91

00:11:25.430 --> 00:11:38.109

Nicole Enciso: Once your name is called, it will be stated that you have been unmuted to speak. Please state your first and last name clearly. spell your name for the record. and identify if you are representing an agency or organization.

92

00:11:38.930 --> 00:11:52.620

Nicole Enciso: If you have joined by dialing in and wish to speak. please raise your hand by pressing Star 9. Once it is your turn to speak. you will hear the prompt. You have been unmuted. Please unmute yourself by pressing Star 6.

93

00:11:53.200 --> 00:11:55.440

Nicole Enciso: State your first and last name clearly.

94

00:11:55.930 --> 00:11:57.449

Nicole Enciso: spell your name for the record

95

00:11:57.550 --> 00:12:01.319

Nicole Enciso: and identify. If you are representing an agency or organization.

96

00:12:03.380 --> 00:12:07.910

Nicole Enciso: I'll now hand it over to Lisa to facilitate the public comments

97

00:12:14.860 --> 00:12:20.649

Lisa Blewitt: as Nicole mentioned. If you have any comments. please raise your hand

98

00:12:22.060 --> 00:12:24.259

Lisa Blewitt: by pressing Star 9,

99

00:12:25.580 --> 00:12:30.499

Lisa Blewitt: or by using the raise hand function through zoom.

100

00:12:40.070 --> 00:12:42.440

Lisa Blewitt: We have one raised hand.

101

00:12:44.120 --> 00:12:47.689

Lisa Blewitt: I will go ahead and allow you to talk. Again,

102

00:12:48.110 --> 00:12:51.780

Lisa Blewitt: Please unmute yourself to provide your comment.

103

00:12:52.290 --> 00:13:04.300

Lisa Blewitt: state your first and last name clearly. spell your name for the record and identify If you're representing an agency or organization. The 3 minute timer

104

00:13:04.460 --> 00:13:06.679

Lisa Blewitt: will start once you begin.

105

00:13:15.290 --> 00:13:37.600

Boardroom Local 94: Hi, good afternoon. This is Marcos Holguin, M A R C O S H O L G U I N. Council for ILWU local 94 which represents the foremen at the port of La. Just a question, if the port has identified a attendant or an operator for this project yet. Thank you.

106

00:13:46.310 --> 00:13:47.480

Lisa Blewitt: Thank you.

107

00:13:58.140 --> 00:14:04.379

Lisa Blewitt: Are there any other questions or comments at this time. Please raise your hand

108

00:14:06.150 --> 00:14:09.740

Lisa Blewitt: or press 9. If you're calling in by phone

109

00:14:12.500 --> 00:14:15.440

Lisa Blewitt: doesn't look like anyone's called in by phone.

110

00:14:25.650 --> 00:14:29.699

Lisa Blewitt: We will wait for another minute or so to see if anyone

111

00:14:30.010 --> 00:14:34.379

Lisa Blewitt: has any questions or comments they would like to raise at this time.

112

00:14:38.920 --> 00:14:44.280

Lisa Blewitt: Otherwise you have the opportunity to submit comments through email

113

00:14:44.310 --> 00:14:47.920

Lisa Blewitt: or snail mail as well.

114

00:15:10.380 --> 00:15:15.070

Nicole Enciso: All right, seeing as there's no other comments, I think we can go ahead and move to the next slide.

Public Scoping Meeting for the Terminal Island Maritime Support Facility
January 9, 2024

115

00:15:20.880 --> 00:15:25.550

Nicole Enciso: We would like to thank everybody for their time today. As a reminder,

116

00:15:25.620 --> 00:15:33.429

Nicole Enciso: public review period for this project is open and we will be accepting comments until January 22nd, 2024

117

00:15:34.310 --> 00:15:40.070

Nicole Enciso: written comments can be sent via mail or email to Director of Environmental Management

118

00:15:40.210 --> 00:15:42.330

Nicole Enciso: City of Los Angeles Harbor Department

119

00:15:42.640 --> 00:15:45.140

Nicole Enciso: 425 South Palos Verdes Street.

120

00:15:45.210 --> 00:15:48.810

Nicole Enciso: San Pedro, California 90731.

121

00:15:49.250 --> 00:16:03.390

Nicole Enciso: or emailed to CEQAcomments@portlae.org. Please include the project title in the subject line, which is the Terminal Island maritime support facility project. All comments received will become part of the public record.

122

00:16:04.230 --> 00:16:08.179

Nicole Enciso: This concludes the public meeting, thank you, and have a good rest of your day.

Appendix B

Air Quality, Greenhouse Gas, and Health Risk Calculations

- Appendix B1: Air Quality and Greenhouse Gas Calculations
- Appendix B2: Health Risk Assessment

Appendix B1

Air Quality and Greenhouse Gas Calculations

Terminal Island MSF - Air Quality/GHG Emissions Summary

Construction AQ
Air Pollutant Emissions, Maximum Daily (lb/day)

Construction Emissions	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
2026	3.90	90.00	53.00	0.41	2.00	45.00	46.00	1.90	10.00	12.00
2027	17.00	87.00	51.00	0.41	1.90	45.00	46.00	1.80	10.00	12.00
2028	1.40	12.00	20.00	0.04	0.33	7.30	7.60	0.31	1.00	1.30
Maximum Daily (lb/day)	**17.00**	**90.00**	**53.00**	**0.41**	**2.00**	**45.00**	**46.00**	**1.90**	**10.00**	**12.00**

Construction AQ
Annual Rate (tons/year)

Construction Emissions	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
2026	0.30	7.00	4.00	0.03	0.15	3.40	3.50	0.14	0.79	0.93
2027	0.90	4.70	4.50	0.02	0.12	2.90	3.00	0.12	0.47	0.59
2028	0.06	0.49	0.81	< 0.005	0.01	0.29	0.31	0.01	0.04	0.05
Total Duration of Construction (tons)	**1.26**	**12.19**	**9.31**	**0.05**	**0.28**	**6.59**	**6.81**	**0.27**	**1.30**	**1.57**

Acronyms: reactive organic gases (ROG) equivalent to volatile organic compounds (VOC); nitrogen oxides (NOx); carbon monoxide (CO); sulfur dioxide (SO2).
Respirable particulate matter less than 10 micrometers (PM10); fine particulate matter less than 2.5 micrometers (PM2.5).
PM10 from exhaust (PM10E), dust (PM10D), and total (PM10T); PM2.5 from exhaust (PM2.5E), dust (PM2.5D), and total (PM2.5T).
Diesel particulate matter (DPM).

Operation AQ

Opening Year (2029)										
Operation Emissions	**ROG**	**NOx**	**CO**	**SO_2**	**PM10E**	**PM10D**	**PM10T**	**PM2.5E**	**PM2.5D**	**PM2.5T**
Worker Vehicles	0.62	0.61	7.10	0.02	0.01	1.90	1.90	0.01	0.48	0.49
Cargo-Handling Equipment	1.90	9.90	101.00	0.19	0.38	< 0.01	0.38	0.38	< 0.01	0.38
Energy and Area Sources	1.20	0.05	3.11	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Off-site, Truck Trips	0.18	32.15	5.02	0.24	0.10	8.48	8.58	0.09	1.71	1.81
On-site, Truck Trips	0.32	52.16	7.40	0.23	0.08	6.08	6.15	0.08	1.24	1.32
On-site, Idling	5.43	32.15	53.15	0.07	0.01	0.00	0.01	0.01	0.00	0.01
Maximum Daily, Opening Year (lb/day)	**9.65**	**127.02**	**176.78**	**0.75**	**0.58**	**16.45**	**17.02**	**0.57**	**3.43**	**4.00**
Annual, Opening Year (ton/year)	**1.76**	**23.18**	**32.26**	**0.14**	**0.11**	**3.00**	**3.11**	**0.10**	**0.63**	**0.73**

Operation AQ

Buildout Year (2049)										
Operation Emissions	**ROG**	**NOx**	**CO**	**SO_2**	**PM10E**	**PM10D**	**PM10T**	**PM2.5E**	**PM2.5D**	**PM2.5T**
Worker Vehicles	0.58	0.49	6.90	0.02	0.01	2.40	2.40	0.01	0.61	0.61
Cargo-Handling Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Energy and Area Sources	1.20	0.05	3.11	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Off-site, Truck Trips	0.24	41.79	11.61	0.30	0.11	15.78	15.89	0.10	3.20	3.30
On-site, Truck Trips	0.44	69.59	16.20	0.28	0.11	11.31	11.42	0.10	2.31	2.41
On-site, Idling	10.08	59.72	98.70	0.14	0.02	0.00	0.02	0.02	0.00	0.02
Maximum Daily, Buildout Year (lb/day)	**12.54**	**171.63**	**136.52**	**0.73**	**0.24**	**29.49**	**29.73**	**0.23**	**6.12**	**6.34**
Annual, Buildout Year (ton/year)	**2.29**	**31.32**	**24.92**	**0.13**	**0.04**	**5.38**	**5.43**	**0.04**	**1.12**	**1.16**

GHG Emissions (MT and MT/year)

Construction GHG	CO_2e
One-time Construction	**(MT)**
Total Duration of Construction (MT)	7,046

	CO_2e
	(MT/yr)
Amortized Construction Emissions, Annually	234.9

Operation GHG	CO_2e
Opening Year (2029)	**(MT/yr)**
Worker Vehicles	308
Cargo-Handling Equipment	2,389
Electricity Use	282
Other Energy, Area Sources	13
Off-site, Truck Trips	4,426
On-site, Truck Trips	4,201
On-site, Idling	1,545
Total, Opening Year (MT/year)	**13,163**

	CO_2e
Operation, with Amortized Construction	**(MT/yr)**
Opening Year (2029), Total Annualized (MT/year)	13,398
Opening Year (2029), without Electricity Use (MT/year)	13,116

Operation GHG	CO_2e
Buildout Year (2049)	**(MT/yr)**
Worker Vehicles	335
Cargo-Handling Equipment	0
Electricity Use	1,151
Other Energy, Area Sources	13
Off-site, Truck Trips	5,710
On-site, Truck Trips	5,316
On-site, Idling	2,870
Total, Buildout Year (MT/year)	**15,395**

	CO_2e
Operation, with Amortized Construction	**(MT/yr)**
Buildout Year (2049), Total Annualized (MT/year)	15,630
Buildout Year (2049), without Electricity Use (MT/year)	14,479

Acronyms: metric tons (MT); carbon dioxide-equivalents (CO2e).

Terminal Island MSF - Air Quality/GHG Emissions, schedule basis

Construction Activity Details (Tab 5.1 from CalEEMod Report)

Construction Schedule

Phase Name	Start Date	End Date	Days Per Week	Months, Est.	Work Days per Phase
Site Preparation	6/1/2026	1/8/2027	5	8	160
Grading	1/9/2027	6/25/2027	5	6	120
Building Construction	6/26/2027	3/31/2028	5	10	200
Substation-Electrical	4/1/2028	4/28/2028	5	1	20
Paving	6/30/2027	9/21/2027	5	3	60
Architectural Coating	10/8/2027	12/30/2027	5	3	60

(Phasing basis ~ 20 work days / month)

Terminal Island MSF - Air Quality/GHG Emissions, construction off-road equipment basis

Construction Activity Details (Tab 5.2 from CalEEMod Report)

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3	8	367	0.4
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4	8	84	0.37
Grading	Graders	Diesel	Average	1	8	148	0.41
Grading	Excavators	Diesel	Average	2	8	36	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2	8	84	0.37
Grading	Scrapers	Diesel	Average	2	8	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1	8	367	0.4
Building Construction	Forklifts	Diesel	Average	3	8	82	0.2
Building Construction	Generator Sets	Diesel	Average	1	8	14	0.74
Building Construction	Cranes	Diesel	Average	1	7	367	0.29
Building Construction	Welders	Diesel	Average	1	8	46	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3	7	84	0.37
Substation-Electrical	Forklifts	Diesel	Average	3	8	82	0.2
Substation-Electrical	Generator Sets	Diesel	Average	1	8	14	0.74
Substation-Electrical	Cranes	Diesel	Average	1	7	367	0.29
Substation-Electrical	Welders	Diesel	Average	1	8	46	0.45
Substation-Electrical	Tractors/Loaders/Backhoes	Diesel	Average	3	7	84	0.37
Substation-Electrical	Bore/Drill Rigs	Diesel	Average	1	4	83	0.5
Paving	Pavers	Diesel	Average	2	8	81	0.42
Paving	Paving Equipment	Diesel	Average	2	8	89	0.36
Paving	Rollers	Diesel	Average	2	8	36	0.38
Architectural Coating	Air Compressors	Diesel	Average	3	6	37	0.48

Terminal Island MSF - Air Quality/GHG Emissions, construction on-highway vehicles basis

Construction Activity Details (Tab 5.3 from CalEEMod Report)

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation				
Site Preparation	Worker	60	19	LDA,LDT1,LDT2
Site Preparation	Vendor	10	10	HHDT,MHDT
Site Preparation	Hauling	200	80	HHDT
Site Preparation	Onsite truck	40	4	HHDT
Grading				
Grading	Worker	60	19	LDA,LDT1,LDT2
Grading	Vendor	10	10	HHDT,MHDT
Grading	Hauling	140	50	HHDT
Grading	Onsite truck	40	4	HHDT
Building Construction				
Building Construction	Worker	120	19	LDA,LDT1,LDT2
Building Construction	Vendor	4	10	HHDT,MHDT
Building Construction	Hauling	20	20	HHDT
Building Construction	Onsite truck	10	4	HHDT
Paving				
Paving	Worker	30	19	LDA,LDT1,LDT2
Paving	Vendor	10	10	HHDT,MHDT
Paving	Hauling	20	20	HHDT
Paving	Onsite truck	10	4	HHDT
Architectural Coating				
Architectural Coating	Worker	60	19	LDA,LDT1,LDT2
Architectural Coating	Vendor	10	10	HHDT,MHDT
Architectural Coating	Hauling	20	20	HHDT
Architectural Coating	Onsite truck	10	4	HHDT
Substation-Electrical				
Substation-Electrical	Worker	30	19	LDA,LDT1,LDT2
Substation-Electrical	Vendor	10	10	HHDT,MHDT
Substation-Electrical	Hauling	20	20	HHDT
Substation-Electrical	Onsite truck	10	4	HHDT

Terminal Island MSF - Air Quality/GHG Emissions, construction subtotals
Construction Emissions Details (Tab 2.3 from CalEEMod Report)

Construction AQ - Criteria Air Pollutants

2.3 Construction Emissions by Year, with Dust Control										
Year	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max), (lb/day)										
2026	3.90	88.00	53.00	0.41	2.00	45.00	46.00	1.90	10.00	12.00
2027	5.70	52.00	40.00	0.22	1.40	32.00	34.00	1.30	5.50	6.80
2028	1.20	12.00	17.00	0.04	0.33	6.10	6.50	0.31	0.75	1.10
Daily - Winter (Max), (lb/day)										
2026	3.90	90.00	52.00	0.41	2.00	45.00	46.00	1.90	10.00	12.00
2027	17.00	87.00	51.00	0.41	1.90	45.00	46.00	1.80	10.00	12.00
2028	1.40	11.00	20.00	0.03	0.32	7.30	7.60	0.30	1.00	1.30
Average Daily (lb/day)										
2026	1.60	38.00	22.00	0.17	0.82	18.00	19.00	0.78	4.30	5.10
2027	4.90	26.00	25.00	0.10	0.67	16.00	16.00	0.63	2.60	3.20
2028	0.32	2.70	4.40	0.01	0.08	1.60	1.70	0.07	0.22	0.29
Annual (tons/year)										
2026	0.30	7.00	4.00	0.03	0.15	3.40	3.50	0.14	0.79	0.93
2027	0.90	4.70	4.50	0.02	0.12	2.90	3.00	0.12	0.47	0.59
2028	0.06	0.49	0.81	< 0.005	0.01	0.29	0.31	0.01	0.04	0.05

Construction (tons)	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Total Duration	1.26	12.19	9.31	0.05	0.28	6.59	6.81	0.27	1.30	1.57

Construction GHG - Totals

Year	$NBCO_2$	CO_2T	CH_4	N_2O	R	CO_2e
Annual						
2026	4,188	4,188	0.20	0.61	3.80	4,378
2027	2,374	2,374	0.10	0.28	1.80	2,460
2028	204	204	0.01	0.01	0.12	208

Construction (MT)	$NBCO_2$	CO_2T	CH_4	N_2O	R	CO_2e
Total Duration	6,766	6,766	0.31	0.90	5.72	7,046

Terminal Island MSF - Air Quality/GHG Emissions, operational subtotals

Operational Emissions Summary with CalEEMod Details (Tab 2.5 from CalEEMod Report)

Operational AQ, Opening Year (2029) - Worker Trips and Cargo Handling

Daily (Max) - (lb/day)	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Mobile	0.62	0.61	7.10	0.02	0.01	1.90	1.90	0.01	0.48	0.49
Area	1.20	0.03	3.10	< 0.005	0.01	0.00	0.01	< 0.005	0.00	< 0.005
Energy	< 0.005	0.02	0.01	< 0.005	< 0.005		< 0.005	< 0.005		< 0.005
Off-Road	1.90	9.90	101.00	0.19	0.38		0.38	0.38		0.38
Subtotal, Worker Trips and Yard	3.72	10.56	111.21	0.21	0.40	1.90	2.29	0.39	0.48	0.87

	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Worker Vehicles	0.62	0.61	7.10	0.02	0.01	1.90	1.90	0.01	0.48	0.49
Cargo-Handling Equipment	1.90	9.90	101.00	0.19	0.38	< 0.01	0.38	0.38	< 0.01	0.38
Energy and Area Sources	1.20	0.05	3.11	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01

Operational AQ, Buildout Year (2049) - Worker Trips and Cargo Handling

Daily (Max) - (lb/day)	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Mobile	0.58	0.49	6.90	0.02	0.01	2.40	2.40	0.01	0.61	0.61
Area	1.20	0.03	3.10	< 0.005	0.01	0.00	0.01	< 0.005	0.00	< 0.005
Energy	< 0.005	0.02	0.01	< 0.005	< 0.005		< 0.005	< 0.005		< 0.005
Off-Road	0.00	0.00	0.00	0.00	0.00		0.00	0.00		0.00
Subtotal, Worker Trips and Yard	1.78	0.54	10.01	0.02	0.02	2.40	2.41	0.01	0.61	0.61

Note: cargo handling equipment assumption is diesel in Opening Year (2029) and zero-emissions (e.g., battery electric) in Buildout Year (2049).

	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Worker Vehicles	0.58	0.49	6.90	0.02	0.01	2.40	2.40	0.01	0.61	0.61
Cargo-Handling Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Energy and Area Sources	1.20	0.05	3.11	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01

Operational GHG, Opening Year - Worker Trips and Cargo Handling

Annual (MT/year)	BCO_2	$NBCO_2$	CO_2T	CH_4	N_2O	R	CO_2e
Mobile		304	304	0.01	0.01	0.34	308
Area		1.4	1.4	< 0.005	< 0.005		1.5
Energy		283	283	0.02	< 0.005		285
Water	0.49	3.3	3.8	0.05	< 0.005		5.4
Waste	0.73	0	0.73	0.07	0		2.5
Refrig.						0.19	0.19
Off-Road		2380	2380	0.1	0.02		2,389
Subtotal GHG	1.2	2973	2974	0.3	0.0	0.5	2,992

	CO_2e
Worker Vehicles	308
Cargo-Handling Equipment	2,389
Electricity Use	282
Other Energy (natural gas), Water, Waste, Area Sources	13

Operational GHG, Buildout Year - Worker Trips and Cargo Handling

Annual (MT/year)	BCO_2	$NBCO_2$	CO_2T	CH_4	N_2O	R	CO_2e
Mobile		332	332	0.01	0.01	0.02	335
Area		1.4	1.4	< 0.005	< 0.005		1.5
Energy		1149	1149	0.08	0.01		1154
Water	0.49	3.3	3.8	0.05	< 0.005		5.4
Waste	0.73	0	0.73	0.07	0		2.5
Refrig.						0.19	0.19
Off-Road		0	0	0	0		0
Subtotal GHG	1.2	1485.0	1486.0	0.2	0.0	0.2	1,499

Note: cargo handling equipment assumption is diesel in Opening Year (2029) and zero-emissions (e.g., battery electric) in Buildout Year (2049).

	CO_2e
Worker Vehicles	335
Cargo-Handling Equipment	0
Electricity Use	1,151
Other Energy (natural gas), Water, Waste, Area Sources	13

Terminal Island MSF - Air Quality/GHG Emissions, operational subtotals

Operational Emissions - Truck Travel Details

Operational Activity Assumptions, Diverted Truck Trips - Trip Characteristics and Idling

Opening Year (2029)	Trips, one-way (trip/day)	Average Length (mi/trip)	Average Speed (mph)	VMT Change (mi/day)	Visits daily, for Idling	Idling Time (hr/visit)	Truck Idling (hr/day)
Off-site	3,682	**1.87**	30	6,885			
On-site	3,682	**1.32**	15	4,866	1,841	**0.34**	632.9
Buildout (2049)							
Off-site	6,838	**1.87**	30	12,787			
On-site	6,838	**1.32**	15	9,037	3,419	**0.34**	1,175.4

Notes:

Off-site VMT: average diverted truck trip length of 1.87 miles (POLA Goods Movement Division, spreadsheet 20230112; LAHD, 2023).

Terminal Way posted speed limit: 30 mph.

On-site speed limit: 15 mph (terminal inside gate).

Operational Activity Assumptions, Diverted Truck Circulation - Trip Lengths via Grade Separation and On-site Circulation

Segment	**Description**	feet/trip	mi/trip
Ferry/Terminal Way to "In" Gate	Inbound via Grade Separation	4,110	0.78
"In" Gate to Interior Stall	Inbound, terminal inside	2,695	0.51
Interior Stall to Roadability Canopy	Outbound, terminal inside	2,311	0.44
Roadability to "Out" Gate	Outbound, terminal inside	1,030	0.20
"Out" Gate to Ferry/Terminal Way	Outbound, via Grade Separation	3,810	0.72

On-site VMT: average length of inbound and outbound circulation (via Grade Separation and interior chassis paths; LAHD, 2025).

On-site Trip Length	feet/trip	mi/trip
Inbound Length (total)	6,805	1.29
Outbound Length (total)	7,151	1.35
Average: Inbound & Outbound	**6,978**	**1.32**

Operational Activity Assumptions, Diverted Truck Idling per Visit - Durations from Time On-site

Total Time on Terminal :	0.47	hours
On-site Travel Distance (sum of "terminal inside gate") :	1.14	miles
On-site Travel Time :	0.08	hr/visit, at 15 mph
Engine Off for Roadability Inspection :	0.05	hr/visit, for 3 minute pre-trip inspection
On-site Idling Time :	**0.34**	**hr/visit**

Notes:

Time on Terminal: 0.47 hours (28.2 min.) from POLA Emission Inventory Table 7.2, Non-Container Facility Operating Characteristics (Sept 2025).

Idling Time per Visit = Total Time on Terminal (0.47 hr) minus On-site Travel Time (terminal inside gate) minus Roadability Inspection.

Operational AQ, Truck Travel - Daily Emissions (lb/day) = (VMT Change) * (lb/VMT) from EMFAC Emissions Inventory

	ROG	NOx	CO	SO_2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Opening Year (2029)	(lb/d)	(lb/d)	(lb/d)	(lb/d)	(lb/d)	(lb/d)	(lb/d)	(lb/d)	(lb/d)	(lb/d)
Off-site, Travel	0.18	32.15	5.02	0.24	0.10	8.48	8.58	0.09	1.71	1.81
On-site, Travel	0.32	52.16	7.40	0.23	0.08	6.08	6.15	0.08	1.24	1.32
Buildout (2049)										
Off-site, Travel	0.24	41.79	11.61	0.30	0.11	15.78	15.89	0.10	3.20	3.30
On-site, Travel	0.44	69.59	16.20	0.28	0.11	11.31	11.42	0.10	2.31	2.41

Operational GHG, Truck Travel - Annual Emissions (lb/year) = 365 days/year * (VMT Change) * (lb/VMT) from EMFAC Emissions Inventory

	CO2	CH4	N2O
Opening Year (2029)	(lb/y)	(lb/y)	(lb/y)
Off-site, Travel	9.32E+06	138.77	1473.91
On-site, Travel	8.84E+06	209.61	1399.33
Buildout (2049)			
Off-site, Travel	1.20E+07	505.78	1912.74
On-site, Travel	1.12E+07	738.22	1782.99

Note: Global Warming Potentials from IPCC's (2007) Fourth Assessment Report.

GWP =	1	25	298

Opening Year (2029)	**GHG (MTCO2e/year)**
Off-site	4,426
On-site	4,201

Buildout (2049)	**GHG (MTCO2e/year)**
Off-site	5,710
On-site	5,316

Operational AQ, Truck Idling - Daily Emissions (lb/day) = (one-way trips / 2) * (Idling Time per Visit) * (g/hour) from zero-speed factors

	ROG	NOx	CO	SO_2	PM10E			PM2.5E		
Idling, Emission Factors	(g/hr)	(g/hr)	(g/hr)	(g/hr)	(g/hr)			(g/hr)		
Speed (0 mph = g/hour)	3.8895	23.0445	38.0907	0.0531	0.0069			0.0066		

Emission Factors: SPBP Emissions Inventory Methodology Report (v.5 - 2024): Table 6.3: 2023 Speed-Specific Composite Emission Factors.

	ROG	NOx	CO	SO_2	PM10E			PM2.5E		
Opening Year (2029)	(lb/d)	(lb/d)	(lb/d)	(lb/d)	(lb/d)			(lb/d)		
On-site, Idling	5.43	32.15	53.15	0.07	0.010			0.009		
Buildout (2049)										
On-site, Idling	10.08	59.72	98.70	0.14	0.018			0.017		

Operational GHG, Truck Idling - Annual Emissions (MT/year)

	CO2	CH4	N2O
Idling, Emission Factors	(g/hr)	(g/hr)	(g/hr)
Speed (0 mph = g/hour)	6405	0.2288	0.9325

Emission Factors: SPBP Emissions Inventory Methodology Report (v.5 - 2024): Table 6.3: 2023 Speed-Specific Composite Emission Factors.

	CO2	CH4	N2O
Opening Year (2029)	(MT/y)	(MT/y)	(MT/y)
On-site, Idling	1479.64	0.05	0.22
Buildout (2049)			
On-site, Idling	2747.90	0.10	0.40

Note: Global Warming Potentials from IPCC's (2007) Fourth Assessment Report.

GWP =	1	25	298

Opening Year (2029)	**GHG (MTCO2e/year)**
Idling	1,545
Buildout (2049)	**GHG (MTCO2e/year)**
Idling	2,870

Operational Emissions Details (Truck Trip Emission Factors Summary, from EMFAC2021)

Source: EMFAC2021 (v1.0.2) Emissions Inventory >> Converted to lb/VMT
Region Type: Sub-Area
Region: Los Angeles (SC)
Calendar Year: 2029, 2049
Season: Annual
Vehicle Classification: EMFAC202x Categories

Vehicle Class, Calendar Year, Speed	(lb/VMT) ROG_RUNEX	(lb/VMT) NOx_RUNEX	(lb/VMT) CO_RUNEX	(lb/VMT) SOx_RUNEX	(lb/VMT) PM10_RUNEX	(lb/VMT) PM10_PMBW	(lb/VMT) PM2.5_RUNEX	(lb/VMT) PM2.5_PMBW	(lb/VMT) CO2_RUNEX	(lb/VMT) CH4_RUNEX	(lb/VMT) N2O_RUNEX
T7 POLA Class 8, Year:2029, mph:30	2.69E-05	4.67E-03	7.29E-04	3.46E-05	1.44E-05	2.82E-04	1.38E-05	9.86E-05	3.71E+00	5.52E-05	5.86E-04
T7 POLA Class 8, Year:2029, mph:15	6.63E-05	1.07E-02	1.52E-03	4.63E-05	1.62E-05	2.99E-04	1.55E-05	1.05E-04	4.98E+00	1.18E-04	7.88E-04

Vehicle Class, Calendar Year, Speed	(lb/VMT) ROG_RUNEX	(lb/VMT) NOx_RUNEX	(lb/VMT) CO_RUNEX	(lb/VMT) SOx_RUNEX	(lb/VMT) PM10_RUNEX	(lb/VMT) PM10_PMBW	(lb/VMT) PM2.5_RUNEX	(lb/VMT) PM2.5_PMBW	(lb/VMT) CO2_RUNEX	(lb/VMT) CH4_RUNEX	(lb/VMT) N2O_RUNEX
T7 POLA Class 8, Year:2049, mph:30	1.85E-05	3.27E-03	9.08E-04	2.34E-05	8.51E-06	2.85E-04	8.13E-06	9.96E-05	2.57E+00	1.08E-04	4.10E-04
T7 POLA Class 8, Year:2049, mph:15	4.92E-05	7.70E-03	1.79E-03	3.06E-05	1.17E-05	3.02E-04	1.11E-05	1.06E-04	3.39E+00	2.24E-04	5.41E-04

For PM10D & PM2.5D: Adjust EMFAC EI by adding tire wear and road dust

Tire Wear Emission Factor (lb/VMT) - EMFAC2021 (aggregate speeds)

PM10_TW	PM2.5_TW
7.94E-05	1.98E-05

Road Dust Emission Factor (lb/VMT) - Ref prior calculations: POLA Navy Way (2022)

PM10D	PM2.5D
8.70E-04	1.31E-04

Vehicle Class, Calendar Year, Speed	(lb/VMT) PM10D	(lb/VMT) PM2.5D
T7 POLA Class 8, Year:2029, mph:30	1.23E-03	2.49E-04
T7 POLA Class 8, Year:2029, mph:15	1.25E-03	2.55E-04

Vehicle Class, Calendar Year, Speed	(lb/VMT) PM10D	(lb/VMT) PM2.5D
T7 POLA Class 8, Year:2049, mph:30	1.23E-03	2.50E-04
T7 POLA Class 8, Year:2049, mph:15	1.25E-03	2.56E-04

TIMSF - Construction Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.3. Construction Emissions by Year, Mitigated

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

3.2. Site Preparation (2026) - Mitigated

3.3. Site Preparation (2027) - Unmitigated

3.4. Site Preparation (2027) - Mitigated

3.5. Grading (2027) - Unmitigated

3.6. Grading (2027) - Mitigated

3.7. Building Construction (2027) - Unmitigated

3.8. Building Construction (2027) - Mitigated

3.9. Building Construction (2028) - Unmitigated

3.10. Building Construction (2028) - Mitigated

3.11. Substation-Electrical (2028) - Unmitigated

3.12. Substation-Electrical (2028) - Mitigated

3.13. Paving (2027) - Unmitigated

3.14. Paving (2027) - Mitigated

3.15. Architectural Coating (2027) - Unmitigated

3.16. Architectural Coating (2027) - Mitigated

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.2.2. Mitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.3.2. Mitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

8.1. Justifications

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	TIMSF - Construction
Construction Start Date	6/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.5
Precipitation (days)	7.2
Location	33.74865331181583, -118.25653116526375
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4613
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.35

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Parking Lot	80	Acre	73	75	0.00	0.00	—	—
General Light Industry	4.4	1000sqft	0.10	4,400	400	0.00	—	Welfare buildings

Enclosed Parking Structure	64	1000sqft	1.5	64,000	0.00	0.00	—	Roadability canopies

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-9	Use Dust Suppressants
Construction	C-10-A	Water Exposed Surfaces
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-13	Use Low-VOC Paints for Construction

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.2	5.7	88	53	0.41	2.0	271	273	1.9	38	40	—	60,433	60,433	2.9	8.7	127	63,236
Mit.	7.2	5.7	88	53	0.41	2.0	45	46	1.9	10	12	—	60,433	60,433	2.9	8.7	127	63,236
% Reduced	—	—	—	—	—	—	84%	83%	—	73%	69%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	17	17	90	52	0.41	2.0	271	273	1.9	38	40	—	60,398	60,398	2.9	8.7	3.3	63,078
Mit.	17	17	90	52	0.41	2.0	45	46	1.9	10	12	—	60,398	60,398	2.9	8.7	3.3	63,078
% Reduced	—	—	—	—	—	—	84%	83%	—	73%	69%	—	—	—	—	—	—	—

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.8	4.9	38	25	0.17	0.82	127	128	0.78	16	16	—	25,297	25,297	1.2	3.7	23	26,441
Mit.	5.8	4.9	38	25	0.17	0.82	18	19	0.78	4.3	5.1	—	25,297	25,297	1.2	3.7	23	26,441
% Reduced	—	—	—	—	—	—	85%	85%	—	73%	69%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.1	0.90	7.0	4.5	0.03	0.15	23	23	0.14	2.9	3.0	—	4,188	4,188	0.20	0.61	3.8	4,378
Mit.	1.1	0.90	7.0	4.5	0.03	0.15	3.4	3.5	0.14	0.79	0.93	—	4,188	4,188	0.20	0.61	3.8	4,378
% Reduced	—	—	—	—	—	—	85%	85%	—	73%	69%	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	7.2	3.9	88	53	0.41	2.0	271	273	1.9	38	40	—	60,433	60,433	2.9	8.7	127	63,236
2027	6.3	5.7	52	40	0.22	1.4	252	254	1.3	29	30	—	31,276	31,276	1.4	4.0	54	32,545
2028	1.5	1.2	12	17	0.04	0.33	60	60	0.31	6.1	6.4	—	4,726	4,726	0.20	0.31	4.8	4,828
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	7.2	3.9	90	52	0.41	2.0	271	273	1.9	38	40	—	60,398	60,398	2.9	8.7	3.3	63,078
2027	17	17	87	51	0.41	1.9	271	273	1.8	38	40	—	59,301	59,301	2.5	8.7	3.1	61,970
2028	1.8	1.4	11	20	0.03	0.32	61	61	0.30	6.4	6.7	—	5,450	5,450	0.20	0.32	0.20	5,551
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.0	1.6	38	22	0.17	0.82	111	112	0.78	16	16	—	25,297	25,297	1.2	3.7	23	26,441

2027	5.8	4.9	26	25	0.10	0.67	127	128	0.63	14	15	—	14,339	14,339	0.61	1.7	11	14,861
2028	0.40	0.32	2.7	4.4	0.01	0.08	14	14	0.07	1.4	1.5	—	1,232	1,232	0.05	0.07	0.70	1,257
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.55	0.30	7.0	4.0	0.03	0.15	20	20	0.14	2.9	3.0	—	4,188	4,188	0.20	0.61	3.8	4,378
2027	1.1	0.90	4.7	4.5	0.02	0.12	23	23	0.12	2.6	2.7	—	2,374	2,374	0.10	0.28	1.8	2,460
2028	0.07	0.06	0.49	0.81	< 0.005	0.01	2.5	2.5	0.01	0.26	0.28	—	204	204	0.01	0.01	0.12	208

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	7.2	3.9	88	53	0.41	2.0	45	46	1.9	10	12	—	60,433	60,433	2.9	8.7	127	63,236
2027	6.3	5.7	52	40	0.22	1.4	32	34	1.3	5.5	6.8	—	31,276	31,276	1.4	4.0	54	32,545
2028	1.5	1.2	12	17	0.04	0.33	6.1	6.5	0.31	0.75	1.1	—	4,726	4,726	0.20	0.31	4.8	4,828
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	7.2	3.9	90	52	0.41	2.0	45	46	1.9	10	12	—	60,398	60,398	2.9	8.7	3.3	63,078
2027	17	17	87	51	0.41	1.9	45	46	1.8	10	12	—	59,301	59,301	2.5	8.7	3.1	61,970
2028	1.8	1.4	11	20	0.03	0.32	7.3	7.6	0.30	1.0	1.3	—	5,450	5,450	0.20	0.32	0.20	5,551
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.0	1.6	38	22	0.17	0.82	18	19	0.78	4.3	5.1	—	25,297	25,297	1.2	3.7	23	26,441
2027	5.8	4.9	26	25	0.10	0.67	16	16	0.63	2.6	3.2	—	14,339	14,339	0.61	1.7	11	14,861
2028	0.40	0.32	2.7	4.4	0.01	0.08	1.6	1.7	0.07	0.22	0.29	—	1,232	1,232	0.05	0.07	0.70	1,257
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.55	0.30	7.0	4.0	0.03	0.15	3.4	3.5	0.14	0.79	0.93	—	4,188	4,188	0.20	0.61	3.8	4,378
2027	1.1	0.90	4.7	4.5	0.02	0.12	2.9	3.0	0.12	0.47	0.59	—	2,374	2,374	0.10	0.28	1.8	2,460

2028	0.07	0.06	0.49	0.81	< 0.005	0.01	0.29	0.31	0.01	0.04	0.05	—	204	204	0.01	0.01	0.12	208

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	20	20	—	10	10	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.60	< 0.005	0.01	236	236	0.01	24	24	—	598	598	0.05	0.10	1.2	629
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	20	20	—	10	10	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.61	< 0.005	0.01	236	236	0.01	24	24	—	599	599	0.05	0.10	0.03	629

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.6	1.3	12	12	0.02	0.52	—	0.52	0.48	—	0.48	—	2,219	2,219	0.09	0.02	—	2,226
Dust From Material Movement	—	—	—	—	—	—	8.2	8.2	—	4.2	4.2	—	—	—	—	—	—	—
Onsite truck	0.03	0.01	0.48	0.25	< 0.005	< 0.005	97	97	< 0.005	9.7	9.7	—	251	251	0.02	0.04	0.22	263
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.24	2.2	2.2	< 0.005	0.09	—	0.09	0.09	—	0.09	—	367	367	0.01	< 0.005	—	369
Dust From Material Movement	—	—	—	—	—	—	1.5	1.5	—	0.77	0.77	—	—	—	—	—	—	—
Onsite truck	0.01	< 0.005	0.09	0.05	< 0.005	< 0.005	18	18	< 0.005	1.8	1.8	—	41	41	< 0.005	0.01	0.04	44
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.22	0.23	3.9	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	813	813	0.03	0.03	2.8	825
Vendor	0.02	0.01	0.34	0.17	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	312	312	0.01	0.04	0.84	326
Hauling	3.1	0.48	57	19	0.36	0.71	15	16	0.71	4.1	4.8	—	53,413	53,413	2.6	8.5	122	56,140
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.22	0.26	3.3	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	771	771	0.04	0.03	0.07	780
Vendor	0.02	0.01	0.36	0.17	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	312	312	0.01	0.04	0.02	326

Hauling	3.1	0.47	59	19	0.36	0.71	15	16	0.71	4.1	4.8	—	53,419	53,419	2.6	8.5	3.2	56,027
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.12	1.4	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	328	328	0.01	0.01	0.50	332
Vendor	0.01	< 0.005	0.15	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	131	131	0.01	0.02	0.15	136
Hauling	1.3	0.20	25	8.1	0.15	0.30	6.2	6.5	0.30	1.7	2.0	—	22,370	22,370	1.1	3.6	22	23,483
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.26	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	54	54	< 0.005	< 0.005	0.08	55
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	22	22	< 0.005	< 0.005	0.03	23
Hauling	0.24	0.04	4.6	1.5	0.03	0.05	1.1	1.2	0.05	0.31	0.36	—	3,704	3,704	0.18	0.59	3.6	3,888

3.2. Site Preparation (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	7.7	7.7	—	3.9	3.9	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.60	< 0.005	0.01	21	21	0.01	2.1	2.1	—	598	598	0.05	0.10	1.2	629
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	3.7	3.1	29	29	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	7.7	7.7	—	3.9	3.9	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.61	< 0.005	0.01	21	21	0.01	2.1	2.1	—	599	599	0.05	0.10	0.03	629
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.6	1.3	12	12	0.02	0.52	—	0.52	0.48	—	0.48	—	2,219	2,219	0.09	0.02	—	2,226
Dust From Material Movement	—	—	—	—	—	—	3.2	3.2	—	1.7	1.7	—	—	—	—	—	—	—
Onsite truck	0.03	0.01	0.48	0.25	< 0.005	< 0.005	8.7	8.7	< 0.005	0.87	0.87	—	251	251	0.02	0.04	0.22	263
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.24	2.2	2.2	< 0.005	0.09	—	0.09	0.09	—	0.09	—	367	367	0.01	< 0.005	—	369
Dust From Material Movement	—	—	—	—	—	—	0.59	0.59	—	0.30	0.30	—	—	—	—	—	—	—
Onsite truck	0.01	< 0.005	0.09	0.05	< 0.005	< 0.005	1.6	1.6	< 0.005	0.16	0.16	—	41	41	< 0.005	0.01	0.04	44
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.22	0.23	3.9	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	813	813	0.03	0.03	2.8	825

Vendor	0.02	0.01	0.34	0.17	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	312	312	0.01	0.04	0.84	326
Hauling	3.1	0.48	57	19	0.36	0.71	15	16	0.71	4.1	4.8	—	53,413	53,413	2.6	8.5	122	56,140
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.22	0.26	3.3	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	771	771	0.04	0.03	0.07	780
Vendor	0.02	0.01	0.36	0.17	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	312	312	0.01	0.04	0.02	326
Hauling	3.1	0.47	59	19	0.36	0.71	15	16	0.71	4.1	4.8	—	53,419	53,419	2.6	8.5	3.2	56,027
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.12	1.4	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	328	328	0.01	0.01	0.50	332
Vendor	0.01	< 0.005	0.15	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	131	131	0.01	0.02	0.15	136
Hauling	1.3	0.20	25	8.1	0.15	0.30	6.2	6.5	0.30	1.7	2.0	—	22,370	22,370	1.1	3.6	22	23,483
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.26	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	54	54	< 0.005	< 0.005	0.08	55
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	22	22	< 0.005	< 0.005	0.03	23
Hauling	0.24	0.04	4.6	1.5	0.03	0.05	1.1	1.2	0.05	0.31	0.36	—	3,704	3,704	0.18	0.59	3.6	3,888

3.3. Site Preparation (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.6	3.1	28	28	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316

Dust From Material Movement	—	—	—	—	—	—	20	20	—	10	10	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.60	< 0.005	0.01	236	236	0.01	24	24	—	587	587	0.05	0.10	0.03	617
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.44	0.44	< 0.005	0.02	—	0.02	0.02	—	0.02	—	83	83	< 0.005	< 0.005	—	83
Dust From Material Movement	—	—	—	—	—	—	0.31	0.31	—	0.16	0.16	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	3.6	3.6	< 0.005	0.36	0.36	—	9.2	9.2	< 0.005	< 0.005	0.01	9.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14	14	< 0.005	< 0.005	—	14
Dust From Material Movement	—	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.66	0.66	< 0.005	0.07	0.07	—	1.5	1.5	< 0.005	< 0.005	< 0.005	1.6
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.21	0.26	3.1	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	756	756	0.01	0.03	0.06	765

Vendor	0.02	0.01	0.34	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.02	319
Hauling	3.1	0.46	57	19	0.36	0.71	15	16	0.71	4.1	4.8	—	52,354	52,354	2.2	8.5	2.9	54,953
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12	12	< 0.005	< 0.005	0.02	12
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.8	4.8	< 0.005	< 0.005	0.01	5.0
Hauling	0.05	0.01	0.91	0.29	0.01	0.01	0.23	0.24	0.01	0.06	0.07	—	820	820	0.04	0.13	0.77	861
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.0	2.0	< 0.005	< 0.005	< 0.005	2.0
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.79	0.79	< 0.005	< 0.005	< 0.005	0.83
Hauling	0.01	< 0.005	0.17	0.05	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	136	136	0.01	0.02	0.13	143

3.4. Site Preparation (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.6	3.1	28	28	0.05	1.2	—	1.2	1.1	—	1.1	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	7.7	7.7	—	3.9	3.9	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.60	< 0.005	0.01	21	21	0.01	2.1	2.1	—	587	587	0.05	0.10	0.03	617

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.44	0.44	< 0.005	0.02	—	0.02	0.02	—	0.02	—	83	83	< 0.005	< 0.005	—	83
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.32	0.32	< 0.005	0.03	0.03	—	9.2	9.2	< 0.005	< 0.005	0.01	9.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14	14	< 0.005	< 0.005	—	14
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	—	1.5	1.5	< 0.005	< 0.005	< 0.005	1.6
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.21	0.26	3.1	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	756	756	0.01	0.03	0.06	765
Vendor	0.02	0.01	0.34	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.02	319
Hauling	3.1	0.46	57	19	0.36	0.71	15	16	0.71	4.1	4.8	—	52,354	52,354	2.2	8.5	2.9	54,953
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12	12	< 0.005	< 0.005	0.02	12

Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.8	4.8	< 0.005	< 0.005	0.01	5.0
Hauling	0.05	0.01	0.91	0.29	0.01	0.01	0.23	0.24	0.01	0.06	0.07	—	820	820	0.04	0.13	0.77	861
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.0	2.0	< 0.005	< 0.005	< 0.005	2.0
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.79	0.79	< 0.005	< 0.005	< 0.005	0.83
Hauling	0.01	< 0.005	0.17	0.05	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	136	136	0.01	0.02	0.13	143

3.5. Grading (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.5	2.9	26	27	0.06	1.0	—	1.0	0.96	—	0.96	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.4	9.4	—	3.7	3.7	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.59	< 0.005	0.01	236	236	0.01	24	24	—	586	586	0.05	0.10	1.1	617
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.5	2.9	26	27	0.06	1.0	—	1.0	0.96	—	0.96	—	6,598	6,598	0.27	0.05	—	6,621

Dust From Material Movement	—	—	—	—	—	—	9.4	9.4	—	3.7	3.7	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.60	< 0.005	0.01	236	236	0.01	24	24	—	587	587	0.05	0.10	0.03	617
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.97	8.4	9.0	0.02	0.34	—	0.34	0.32	—	0.32	—	2,169	2,169	0.09	0.02	—	2,177
Dust From Material Movement	—	—	—	—	—	—	3.1	3.1	—	1.2	1.2	—	—	—	—	—	—	—
Onsite truck	0.03	0.01	0.37	0.20	< 0.005	< 0.005	76	76	< 0.005	7.6	7.6	—	193	193	0.02	0.03	0.16	203
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.18	1.5	1.6	< 0.005	0.06	—	0.06	0.06	—	0.06	—	359	359	0.01	< 0.005	—	360
Dust From Material Movement	—	—	—	—	—	—	0.56	0.56	—	0.22	0.22	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	14	14	< 0.005	1.4	1.4	—	32	32	< 0.005	0.01	0.03	34
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.21	0.21	3.6	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	797	797	0.03	0.03	2.5	809
Vendor	0.02	0.01	0.33	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.80	319
Hauling	1.4	0.24	25	8.7	0.16	0.31	6.5	6.8	0.31	1.8	2.1	—	22,989	22,989	1.0	3.7	50	24,179

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.21	0.26	3.1	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	756	756	0.01	0.03	0.06	765
Vendor	0.02	0.01	0.34	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.02	319
Hauling	1.4	0.23	26	8.8	0.16	0.31	6.5	6.8	0.31	1.8	2.1	—	22,993	22,993	1.0	3.7	1.3	24,135
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.09	1.1	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	252	252	< 0.005	0.01	0.35	255
Vendor	0.01	< 0.005	0.11	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	101	101	< 0.005	0.01	0.11	105
Hauling	0.47	0.08	8.6	2.9	0.05	0.10	2.1	2.2	0.10	0.58	0.68	—	7,559	7,559	0.33	1.2	7.1	7,940
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.02	0.19	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	42	42	< 0.005	< 0.005	0.06	42
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	17	17	< 0.005	< 0.005	0.02	17
Hauling	0.09	0.01	1.6	0.53	0.01	0.02	0.39	0.41	0.02	0.11	0.12	—	1,251	1,251	0.06	0.20	1.2	1,315

3.6. Grading (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.5	2.9	26	27	0.06	1.0	—	1.0	0.96	—	0.96	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.7	3.7	—	1.4	1.4	—	—	—	—	—	—	—

Onsite truck	0.08	0.03	1.1	0.59	< 0.005	0.01	21	21	0.01	2.1	2.1	—	586	586	0.05	0.10	1.1	617
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.5	2.9	26	27	0.06	1.0	—	1.0	0.96	—	0.96	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.7	3.7	—	1.4	1.4	—	—	—	—	—	—	—
Onsite truck	0.08	0.03	1.1	0.60	< 0.005	0.01	21	21	0.01	2.1	2.1	—	587	587	0.05	0.10	0.03	617
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.97	8.4	9.0	0.02	0.34	—	0.34	0.32	—	0.32	—	2,169	2,169	0.09	0.02	—	2,177
Dust From Material Movement	—	—	—	—	—	—	1.2	1.2	—	0.47	0.47	—	—	—	—	—	—	—
Onsite truck	0.03	0.01	0.37	0.20	< 0.005	< 0.005	6.8	6.8	< 0.005	0.68	0.69	—	193	193	0.02	0.03	0.16	203
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.18	1.5	1.6	< 0.005	0.06	—	0.06	0.06	—	0.06	—	359	359	0.01	< 0.005	—	360
Dust From Material Movement	—	—	—	—	—	—	0.22	0.22	—	0.09	0.09	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	1.2	1.2	< 0.005	0.12	0.13	—	32	32	< 0.005	0.01	0.03	34

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.21	0.21	3.6	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	797	797	0.03	0.03	2.5	809
Vendor	0.02	0.01	0.33	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.80	319
Hauling	1.4	0.24	25	8.7	0.16	0.31	6.5	6.8	0.31	1.8	2.1	—	22,989	22,989	1.0	3.7	50	24,179
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.21	0.26	3.1	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	756	756	0.01	0.03	0.06	765
Vendor	0.02	0.01	0.34	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.02	319
Hauling	1.4	0.23	26	8.8	0.16	0.31	6.5	6.8	0.31	1.8	2.1	—	22,993	22,993	1.0	3.7	1.3	24,135
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.09	1.1	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	252	252	< 0.005	0.01	0.35	255
Vendor	0.01	< 0.005	0.11	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	101	101	< 0.005	0.01	0.11	105
Hauling	0.47	0.08	8.6	2.9	0.05	0.10	2.1	2.2	0.10	0.58	0.68	—	7,559	7,559	0.33	1.2	7.1	7,940
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.02	0.19	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	42	42	< 0.005	< 0.005	0.06	42
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	17	17	< 0.005	< 0.005	0.02	17
Hauling	0.09	0.01	1.6	0.53	0.01	0.02	0.39	0.41	0.02	0.11	0.12	—	1,251	1,251	0.06	0.20	1.2	1,315

3.7. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.02	0.01	0.27	0.15	< 0.005	< 0.005	59	59	< 0.005	5.9	5.9	—	147	147	0.01	0.02	0.28	154
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.02	0.01	0.28	0.15	< 0.005	< 0.005	59	59	< 0.005	5.9	5.9	—	147	147	0.01	0.02	0.01	154
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.46	0.38	3.5	4.8	0.01	0.12	—	0.12	0.11	—	0.11	—	887	887	0.04	0.01	—	890
Onsite truck	0.01	< 0.005	0.10	0.06	< 0.005	< 0.005	21	21	< 0.005	2.1	2.1	—	54	54	< 0.005	0.01	0.05	57
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.63	0.87	< 0.005	0.02	—	0.02	0.02	—	0.02	—	147	147	0.01	< 0.005	—	147
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	3.9	3.9	< 0.005	0.39	0.39	—	9.0	9.0	< 0.005	< 0.005	0.01	9.4
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.48	0.43	0.41	7.2	0.00	0.00	1.6	1.6	0.00	0.37	0.37	—	1,595	1,595	0.07	0.06	5.0	1,618
Vendor	0.01	< 0.005	0.13	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	122	122	0.01	0.02	0.32	128
Hauling	0.10	0.02	1.6	0.63	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,333	1,333	0.07	0.22	2.8	1,403

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.48	0.42	0.52	6.1	0.00	0.00	1.6	1.6	0.00	0.37	0.37	—	1,512	1,512	0.02	0.06	0.13	1,529
Vendor	0.01	< 0.005	0.14	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	122	122	0.01	0.02	0.01	128
Hauling	0.10	0.02	1.6	0.63	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,334	1,334	0.07	0.22	0.07	1,401
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.18	0.15	0.19	2.4	0.00	0.00	0.58	0.58	0.00	0.14	0.14	—	567	567	0.01	0.02	0.79	575
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45	45	< 0.005	0.01	0.05	47
Hauling	0.04	0.01	0.62	0.23	< 0.005	0.01	0.14	0.14	0.01	0.04	0.04	—	493	493	0.02	0.08	0.45	518
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.43	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	94	94	< 0.005	< 0.005	0.13	95
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.5	7.5	< 0.005	< 0.005	0.01	7.8
Hauling	0.01	< 0.005	0.11	0.04	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	82	82	< 0.005	0.01	0.08	86

3.8. Building Construction (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.02	0.01	0.27	0.15	< 0.005	< 0.005	5.3	5.3	< 0.005	0.53	0.53	—	147	147	0.01	0.02	0.28	154
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	1.2	1.0	9.4	13	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.02	0.01	0.28	0.15	< 0.005	< 0.005	5.3	5.3	< 0.005	0.53	0.53	—	147	147	0.01	0.02	0.01	154
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.46	0.38	3.5	4.8	0.01	0.12	—	0.12	0.11	—	0.11	—	887	887	0.04	0.01	—	890
Onsite truck	0.01	< 0.005	0.10	0.06	< 0.005	< 0.005	1.9	1.9	< 0.005	0.19	0.19	—	54	54	< 0.005	0.01	0.05	57
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.08	0.07	0.63	0.87	< 0.005	0.02	—	0.02	0.02	—	0.02	—	147	147	0.01	< 0.005	—	147
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.35	0.35	< 0.005	0.04	0.04	—	9.0	9.0	< 0.005	< 0.005	0.01	9.4
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.48	0.43	0.41	7.2	0.00	0.00	1.6	1.6	0.00	0.37	0.37	—	1,595	1,595	0.07	0.06	5.0	1,618
Vendor	0.01	< 0.005	0.13	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	122	122	0.01	0.02	0.32	128
Hauling	0.10	0.02	1.6	0.63	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,333	1,333	0.07	0.22	2.8	1,403
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.48	0.42	0.52	6.1	0.00	0.00	1.6	1.6	0.00	0.37	0.37	—	1,512	1,512	0.02	0.06	0.13	1,529
Vendor	0.01	< 0.005	0.14	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	122	122	0.01	0.02	0.01	128
Hauling	0.10	0.02	1.6	0.63	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,334	1,334	0.07	0.22	0.07	1,401
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.18	0.15	0.19	2.4	0.00	0.00	0.58	0.58	0.00	0.14	0.14	—	567	567	0.01	0.02	0.79	575
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	45	45	< 0.005	0.01	0.05	47
Hauling	0.04	0.01	0.62	0.23	< 0.005	0.01	0.14	0.14	0.01	0.04	0.04	—	493	493	0.02	0.08	0.45	518
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.43	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	94	94	< 0.005	< 0.005	0.13	95
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.5	7.5	< 0.005	< 0.005	0.01	7.8
Hauling	0.01	< 0.005	0.11	0.04	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	82	82	< 0.005	0.01	0.08	86

3.9. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.99	8.9	13	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.02	0.01	0.27	0.15	< 0.005	< 0.005	59	59	< 0.005	5.9	5.9	—	144	144	0.01	0.02	0.01	151
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.18	1.6	2.3	< 0.005	0.05	—	0.05	0.05	—	0.05	—	427	427	0.02	< 0.005	—	428
Onsite truck	< 0.005	< 0.005	0.05	0.03	< 0.005	< 0.005	10	10	< 0.005	1.0	1.0	—	26	26	< 0.005	< 0.005	0.02	27
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.04	0.03	0.29	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01	—	71	71	< 0.005	< 0.005	—	71
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	1.9	1.9	< 0.005	0.19	0.19	—	4.2	4.2	< 0.005	< 0.005	< 0.005	4.4
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.46	0.41	0.47	5.8	0.00	0.00	1.6	1.6	0.00	0.37	0.37	—	1,485	1,485	0.02	0.06	0.12	1,502
Vendor	0.01	< 0.005	0.13	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	120	120	< 0.005	0.02	0.01	125
Hauling	0.09	0.02	1.6	0.62	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,304	1,304	0.07	0.21	0.07	1,368
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.08	1.1	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	268	268	< 0.005	0.01	0.34	272
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21	21	< 0.005	< 0.005	0.02	22
Hauling	0.02	< 0.005	0.29	0.11	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	232	232	0.01	0.04	0.20	244
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.02	0.20	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	44	44	< 0.005	< 0.005	0.06	45
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	38	38	< 0.005	0.01	0.03	40

3.10. Building Construction (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.99	8.9	13	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.02	0.01	0.27	0.15	< 0.005	< 0.005	5.3	5.3	< 0.005	0.53	0.53	—	144	144	0.01	0.02	0.01	151
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.18	1.6	2.3	< 0.005	0.05	—	0.05	0.05	—	0.05	—	427	427	0.02	< 0.005	—	428
Onsite truck	< 0.005	< 0.005	0.05	0.03	< 0.005	< 0.005	0.92	0.92	< 0.005	0.09	0.09	—	26	26	< 0.005	< 0.005	0.02	27
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01	—	71	71	< 0.005	< 0.005	—	71
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.17	0.17	< 0.005	0.02	0.02	—	4.2	4.2	< 0.005	< 0.005	< 0.005	4.4
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.46	0.41	0.47	5.8	0.00	0.00	1.6	1.6	0.00	0.37	0.37	—	1,485	1,485	0.02	0.06	0.12	1,502
Vendor	0.01	< 0.005	0.13	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	120	120	< 0.005	0.02	0.01	125
Hauling	0.09	0.02	1.6	0.62	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,304	1,304	0.07	0.21	0.07	1,368
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.08	0.07	0.08	1.1	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	268	268	< 0.005	0.01	0.34	272
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21	21	< 0.005	< 0.005	0.02	22
Hauling	0.02	< 0.005	0.29	0.11	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	232	232	0.01	0.04	0.20	244
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.02	0.20	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	44	44	< 0.005	< 0.005	0.06	45
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	38	38	< 0.005	0.01	0.03	40

3.11. Substation-Electrical (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.5	14	0.03	0.31	—	0.31	0.29	—	0.29	—	2,589	2,589	0.11	0.02	—	2,598
Onsite truck	0.02	0.01	0.26	0.15	< 0.005	< 0.005	59	59	< 0.005	5.9	5.9	—	143	143	0.01	0.02	0.26	151
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.52	0.77	< 0.005	0.02	—	0.02	0.02	—	0.02	—	142	142	0.01	< 0.005	—	142
Onsite truck	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	3.2	3.2	< 0.005	0.32	0.32	—	7.9	7.9	< 0.005	< 0.005	0.01	8.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.01	0.01	0.10	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23	23	< 0.005	< 0.005	—	24
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.58	0.58	< 0.005	0.06	0.06	—	1.3	1.3	< 0.005	< 0.005	< 0.005	1.4
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.10	0.10	1.7	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	392	392	< 0.005	0.01	1.1	397
Vendor	0.02	0.01	0.31	0.15	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	299	299	0.01	0.04	0.76	312
Hauling	0.09	0.02	1.5	0.61	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,304	1,304	0.07	0.21	2.6	1,370
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21	21	< 0.005	< 0.005	0.03	21
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	16	16	< 0.005	< 0.005	0.02	17
Hauling	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	71	71	< 0.005	0.01	0.06	75
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.4	3.4	< 0.005	< 0.005	< 0.005	3.5
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.7	2.7	< 0.005	< 0.005	< 0.005	2.8
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12	12	< 0.005	< 0.005	0.01	12

3.12. Substation-Electrical (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	1.2	1.0	9.5	14	0.03	0.31	—	0.31	0.29	—	0.29	—	2,589	2,589	0.11	0.02	—	2,598
Onsite truck	0.02	0.01	0.26	0.15	< 0.005	< 0.005	5.3	5.3	< 0.005	0.53	0.53	—	143	143	0.01	0.02	0.26	151
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.07	0.06	0.52	0.77	< 0.005	0.02	—	0.02	0.02	—	0.02	—	142	142	0.01	< 0.005	—	142
Onsite truck	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	0.28	0.28	< 0.005	0.03	0.03	—	7.9	7.9	< 0.005	< 0.005	0.01	8.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.01	0.01	0.10	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23	23	< 0.005	< 0.005	—	24
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	1.3	1.3	< 0.005	< 0.005	< 0.005	1.4
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.10	0.10	1.7	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	392	392	< 0.005	0.01	1.1	397
Vendor	0.02	0.01	0.31	0.15	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	299	299	0.01	0.04	0.76	312
Hauling	0.09	0.02	1.5	0.61	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,304	1,304	0.07	0.21	2.6	1,370
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21	21	< 0.005	< 0.005	0.03	21

Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	16	16	< 0.005	< 0.005	0.02	17
Hauling	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	71	71	< 0.005	0.01	0.06	75
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.4	3.4	< 0.005	< 0.005	< 0.005	3.5
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.7	2.7	< 0.005	< 0.005	< 0.005	2.8
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12	12	< 0.005	< 0.005	0.01	12

3.13. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.9	10.0	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	3.3	3.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.02	0.01	0.27	0.15	< 0.005	< 0.005	59	59	< 0.005	5.9	5.9	—	147	147	0.01	0.02	0.28	154
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.1	1.6	< 0.005	0.05	—	0.05	0.05	—	0.05	—	248	248	0.01	< 0.005	—	249
Paving	0.53	0.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	9.5	9.5	< 0.005	0.95	0.95	—	24	24	< 0.005	< 0.005	0.02	25

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.21	0.30	< 0.005	0.01	—	0.01	0.01	—	0.01	—	41	41	< 0.005	< 0.005	—	41
Paving	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	1.7	1.7	< 0.005	0.17	0.17	—	4.0	4.0	< 0.005	< 0.005	< 0.005	4.2
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.21	0.21	3.6	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	797	797	0.03	0.03	2.5	809
Vendor	0.02	0.01	0.33	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.80	319
Hauling	0.10	0.02	1.6	0.63	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,333	1,333	0.07	0.22	2.8	1,403
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.04	0.53	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	126	126	< 0.005	< 0.005	0.18	128
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	50	50	< 0.005	0.01	0.06	52
Hauling	0.02	< 0.005	0.27	0.10	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	219	219	0.01	0.04	0.20	230
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21	21	< 0.005	< 0.005	0.03	21
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.3	8.3	< 0.005	< 0.005	0.01	8.7
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36	36	< 0.005	0.01	0.03	38

3.14. Paving (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.9	10.0	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	3.3	3.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.02	0.01	0.27	0.15	< 0.005	< 0.005	5.3	5.3	< 0.005	0.53	0.53	—	147	147	0.01	0.02	0.28	154
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.1	1.6	< 0.005	0.05	—	0.05	0.05	—	0.05	—	248	248	0.01	< 0.005	—	249
Paving	0.53	0.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.85	0.85	< 0.005	0.09	0.09	—	24	24	< 0.005	< 0.005	0.02	25
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.21	0.30	< 0.005	0.01	—	0.01	0.01	—	0.01	—	41	41	< 0.005	< 0.005	—	41
Paving	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.16	0.16	< 0.005	0.02	0.02	—	4.0	4.0	< 0.005	< 0.005	< 0.005	4.2
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.24	0.21	0.21	3.6	0.00	0.00	0.78	0.78	0.00	0.18	0.18	—	797	797	0.03	0.03	2.5	809
Vendor	0.02	0.01	0.33	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.80	319
Hauling	0.10	0.02	1.6	0.63	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,333	1,333	0.07	0.22	2.8	1,403
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.04	0.53	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	126	126	< 0.005	< 0.005	0.18	128
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	50	50	< 0.005	0.01	0.06	52
Hauling	0.02	< 0.005	0.27	0.10	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	219	219	0.01	0.04	0.20	230
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21	21	< 0.005	< 0.005	0.03	21
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.3	8.3	< 0.005	< 0.005	0.01	8.7
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36	36	< 0.005	0.01	0.03	38

3.15. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.41	0.34	2.5	3.4	0.01	0.06	—	0.06	0.05	—	0.05	—	401	401	0.02	< 0.005	—	402

Architectural Coating	15	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.02	0.01	0.28	0.15	< 0.005	< 0.005	59	59	< 0.005	5.9	5.9	—	147	147	0.01	0.02	0.01	154
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.41	0.55	< 0.005	0.01	—	0.01	0.01	—	0.01	—	66	66	< 0.005	< 0.005	—	66
Architectural Coatings	2.4	2.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	9.5	9.5	< 0.005	0.95	0.95	—	24	24	< 0.005	< 0.005	0.02	25
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11	11	< 0.005	< 0.005	—	11
Architectural Coatings	0.44	0.44	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	1.7	1.7	< 0.005	0.17	0.17	—	4.0	4.0	< 0.005	< 0.005	< 0.005	4.2
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.10	0.13	1.5	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	378	378	0.01	0.01	0.03	382
Vendor	0.02	0.01	0.34	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.02	319

Hauling	0.10	0.02	1.6	0.63	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,334	1,334	0.07	0.22	0.07	1,401
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.26	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	63	63	< 0.005	< 0.005	0.09	64
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	50	50	< 0.005	0.01	0.06	52
Hauling	0.02	< 0.005	0.27	0.10	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	219	219	0.01	0.04	0.20	230
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10	10	< 0.005	< 0.005	0.01	11
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.3	8.3	< 0.005	< 0.005	0.01	8.7
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36	36	< 0.005	0.01	0.03	38

3.16. Architectural Coating (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.41	0.34	2.5	3.4	0.01	0.06	—	0.06	0.05	—	0.05	—	401	401	0.02	< 0.005	—	402
Architectural Coatings	15	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.02	0.01	0.28	0.15	< 0.005	< 0.005	5.3	5.3	< 0.005	0.53	0.53	—	147	147	0.01	0.02	0.01	154
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.07	0.06	0.41	0.55	< 0.005	0.01	—	0.01	0.01	—	0.01	—	66	66	< 0.005	< 0.005	—	66
Architectural Coatings	2.4	2.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.85	0.85	< 0.005	0.09	0.09	—	24	24	< 0.005	< 0.005	0.02	25
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11	11	< 0.005	< 0.005	—	11
Architectural Coatings	0.44	0.44	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.16	0.16	< 0.005	0.02	0.02	—	4.0	4.0	< 0.005	< 0.005	< 0.005	4.2
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.10	0.13	1.5	0.00	0.00	0.39	0.39	0.00	0.09	0.09	—	378	378	0.01	0.01	0.03	382
Vendor	0.02	0.01	0.34	0.16	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	306	306	0.01	0.04	0.02	319
Hauling	0.10	0.02	1.6	0.63	0.01	0.02	0.37	0.39	0.02	0.10	0.12	—	1,334	1,334	0.07	0.22	0.07	1,401
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.26	0.00	0.00	0.06	0.06	0.00	0.02	0.02	—	63	63	< 0.005	< 0.005	0.09	64
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	50	50	< 0.005	0.01	0.06	52
Hauling	0.02	< 0.005	0.27	0.10	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	219	219	0.01	0.04	0.20	230
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10	10	< 0.005	< 0.005	0.01	11
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.3	8.3	< 0.005	< 0.005	0.01	8.7
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36	36	< 0.005	0.01	0.03	38

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	6/1/2026	1/8/2027	5.0	160	—
Grading	Grading	1/9/2027	6/25/2027	5.0	120	—
Building Construction	Building Construction	6/26/2027	3/31/2028	5.0	200	—
Substation-Electrical	Building Construction	4/1/2028	4/28/2028	5.0	20	—
Paving	Paving	6/30/2027	9/21/2027	5.0	60	—
Architectural Coating	Architectural Coating	10/8/2027	12/30/2027	5.0	60	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.0	8.0	84	0.37
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41
Grading	Excavators	Diesel	Average	2.0	8.0	36	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.0	8.0	84	0.37
Grading	Scrapers	Diesel	Average	2.0	8.0	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Building Construction	Forklifts	Diesel	Average	3.0	8.0	82	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.0	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.0	46	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.0	7.0	84	0.37
Substation-Electrical	Forklifts	Diesel	Average	3.0	8.0	82	0.20
Substation-Electrical	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Substation-Electrical	Cranes	Diesel	Average	1.00	7.0	367	0.29
Substation-Electrical	Welders	Diesel	Average	1.00	8.0	46	0.45
Substation-Electrical	Tractors/Loaders/Backhoes	Diesel	Average	3.0	7.0	84	0.37
Substation-Electrical	Bore/Drill Rigs	Diesel	Average	1.00	4.0	83	0.50
Paving	Pavers	Diesel	Average	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	8.0	36	0.38

Architectural Coating	Air Compressors	Diesel	Average	3.0	6.0	37	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.0	8.0	84	0.37
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41
Grading	Excavators	Diesel	Average	2.0	8.0	36	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.0	8.0	84	0.37
Grading	Scrapers	Diesel	Average	2.0	8.0	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Building Construction	Forklifts	Diesel	Average	3.0	8.0	82	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.0	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.0	46	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.0	7.0	84	0.37
Substation-Electrical	Forklifts	Diesel	Average	3.0	8.0	82	0.20
Substation-Electrical	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Substation-Electrical	Cranes	Diesel	Average	1.00	7.0	367	0.29
Substation-Electrical	Welders	Diesel	Average	1.00	8.0	46	0.45
Substation-Electrical	Tractors/Loaders/Backhoes	Diesel	Average	3.0	7.0	84	0.37
Substation-Electrical	Bore/Drill Rigs	Diesel	Average	1.00	4.0	83	0.50
Paving	Pavers	Diesel	Average	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	8.0	36	0.38

Architectural Coating	Air Compressors	Diesel	Average	3.0	6.0	37	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	Worker	60	19	LDA,LDT1,LDT2
Site Preparation	Vendor	10.0	10	HHDT,MHDT
Site Preparation	Hauling	200	80	HHDT
Site Preparation	Onsite truck	40	4.0	HHDT
Grading	Worker	60	19	LDA,LDT1,LDT2
Grading	Vendor	10.0	10	HHDT,MHDT
Grading	Hauling	140	50	HHDT
Grading	Onsite truck	40	4.0	HHDT
Building Construction	Worker	120	19	LDA,LDT1,LDT2
Building Construction	Vendor	4.0	10	HHDT,MHDT
Building Construction	Hauling	20	20	HHDT
Building Construction	Onsite truck	10.0	4.0	HHDT
Substation-Electrical	Worker	30	19	LDA,LDT1,LDT2
Substation-Electrical	Vendor	10.0	10	HHDT,MHDT
Substation-Electrical	Hauling	20	20	HHDT
Substation-Electrical	Onsite truck	10.0	4.0	HHDT
Paving	Worker	60	19	LDA,LDT1,LDT2
Paving	Vendor	10.0	10	HHDT,MHDT
Paving	Hauling	20	20	HHDT
Paving	Onsite truck	10.0	4.0	HHDT
Architectural Coating	Worker	30	19	LDA,LDT1,LDT2
Architectural Coating	Vendor	10.0	10	HHDT,MHDT

Architectural Coating	Hauling	20	20	HHDT
Architectural Coating	Onsite truck	10.0	4.0	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	Worker	60	19	LDA,LDT1,LDT2
Site Preparation	Vendor	10.0	10	HHDT,MHDT
Site Preparation	Hauling	200	80	HHDT
Site Preparation	Onsite truck	40	4.0	HHDT
Grading	Worker	60	19	LDA,LDT1,LDT2
Grading	Vendor	10.0	10	HHDT,MHDT
Grading	Hauling	140	50	HHDT
Grading	Onsite truck	40	4.0	HHDT
Building Construction	Worker	120	19	LDA,LDT1,LDT2
Building Construction	Vendor	4.0	10	HHDT,MHDT
Building Construction	Hauling	20	20	HHDT
Building Construction	Onsite truck	10.0	4.0	HHDT
Substation-Electrical	Worker	30	19	LDA,LDT1,LDT2
Substation-Electrical	Vendor	10.0	10	HHDT,MHDT
Substation-Electrical	Hauling	20	20	HHDT
Substation-Electrical	Onsite truck	10.0	4.0	HHDT
Paving	Worker	60	19	LDA,LDT1,LDT2
Paving	Vendor	10.0	10	HHDT,MHDT
Paving	Hauling	20	20	HHDT
Paving	Onsite truck	10.0	4.0	HHDT
Architectural Coating	Worker	30	19	LDA,LDT1,LDT2
Architectural Coating	Vendor	10.0	10	HHDT,MHDT
Architectural Coating	Hauling	20	20	HHDT

Architectural Coating	Onsite truck	10.0	4.0	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	0.00	0.00	190,793

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	60,000	—	240	0.00	0.00
Grading	—	270,000	468	0.00	0.00
Paving	0.00	0.00	0.00	0.00	74

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Parking Lot	73	100%
Paving	General Light Industry	0.00	0%
Paving	Enclosed Parking Structure	1.5	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	690	0.05	0.01
2027	0.00	690	0.05	0.01
2028	0.00	690	0.05	0.01

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.8	annual days of extreme heat
Extreme Precipitation	4.3	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	17
AQ-PM	68
AQ-DPM	100
Drinking Water	42
Lead Risk Housing	—
Pesticides	0.00
Toxic Releases	94
Traffic	64
Effect Indicators	—
CleanUp Sites	100
Groundwater	100
Haz Waste Facilities/Generators	99
Impaired Water Bodies	98
Solid Waste	97
Sensitive Population	—
Asthma	93
Cardio-vascular	62
Low Birth Weights	—
Socioeconomic Factor Indicators	—
Education	34
Housing	—
Linguistic	—

Poverty	—
Unemployment	—

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	—
Employed	—
Median HI	—
Education	—
Bachelor's or higher	—
High school enrollment	—
Preschool enrollment	—
Transportation	—
Auto Access	—
Active commuting	—
Social	—
2-parent households	—
Voting	—
Neighborhood	—
Alcohol availability	—
Park access	—
Retail density	—
Supermarket access	—
Tree canopy	—
Housing	—
Homeownership	—

Housing habitability	—
Low-inc homeowner severe housing cost burden	—
Low-inc renter severe housing cost burden	—
Uncrowded housing	—
Health Outcomes	—
Insured adults	—
Arthritis	77.8
Asthma ER Admissions	13.7
High Blood Pressure	49.4
Cancer (excluding skin)	49.7
Asthma	98.6
Coronary Heart Disease	25.9
Chronic Obstructive Pulmonary Disease	62.6
Diagnosed Diabetes	47.0
Life Expectancy at Birth	0.0
Cognitively Disabled	99.8
Physically Disabled	99.8
Heart Attack ER Admissions	32.2
Mental Health Not Good	71.0
Chronic Kidney Disease	64.9
Obesity	35.5
Pedestrian Injuries	0.0
Physical Health Not Good	61.7
Stroke	58.2
Health Risk Behaviors	—
Binge Drinking	1.0
Current Smoker	35.6
No Leisure Time for Physical Activity	70.6

Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	38.0
Children	99.4
Elderly	83.1
English Speaking	0.0
Foreign-born	0.0
Outdoor Workers	98.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.2
Traffic Density	0.0
Traffic Access	23.0
Other Indices	—
Hardship	0.0
Other Decision Support	—
2016 Voting	0.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	—
Healthy Places Index Score for Project Location (b)	—
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Characteristics: Project Details	POLA Terminal Island MSF - Construction Only
Land Use	80 acre site, 73 acres paved asphalt, with new construction of four canopies and welfare facilities.
Construction: Construction Phases	Approx. 24-mo construction schedule. Substation added July 2024.
Construction: Off-Road Equipment	Fleet forecast updated July 2024. Tracked dozers or excavators may be alternatives.
Construction: Dust From Material Movement	Regrade 60,000 cy and export 270,000 cy of material.
Construction: Trips and VMT	Site preparation includes up to 100 round-trip trucks or 200 one-way HHDT trips daily for material export. Site prep one-way hauling trip lengths based on mix of destinations: (20 percent x 200 miles one-way to Buttonwillow or Kettleman Hills) + (80 percent x 50 miles to non-hazardous disposal site) = 80 miles average. Peak days of up to 60 workers or 120 one-way worker trips daily.
Construction: Architectural Coatings	80 acre site, 73 paved asphalt - 6% of paved area may be coated.

TIMSF - Opening Year 2029 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

2.6. Operations Emissions by Sector, Mitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.1.2. Mitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.2. Electricity Emissions By Land Use - Mitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.2.4. Natural Gas Emissions By Land Use - Mitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.3.2. Mitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.4.2. Mitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.5.2. Mitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.6.2. Mitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.7.2. Mitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.8.2. Mitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.9.2. Mitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.9.2. Mitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.10.4. Landscape Equipment - Mitigated

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.11.2. Mitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.12.2. Mitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.13.2. Mitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.14.2. Mitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

8.1. Justifications

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	TIMSF - Opening Year 2029
Operational Year	2029
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.5
Precipitation (days)	7.2
Location	33.74865331181583, -118.25653116526375
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4613
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.35

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Other Asphalt Surfaces	80	Acre	73	0.00	0.00	0.00	—	—

General Light Industry	4.4	1000sqft	0.10	4,400	0.00	0.00	—	Welfare buildings
General Office Building	2.9	1000sqft	0.07	2,900	400	0.00	—	750 Eldridge existing
Enclosed Parking Structure	64	1000sqft	1.5	64,000	0.00	0.00	—	Roadability canopies

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-9	Use Dust Suppressants
Construction	C-10-A	Water Exposed Surfaces
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.9	3.7	11	111	0.21	0.40	1.9	2.3	0.40	0.48	0.88	7.3	23,909	23,917	1.8	0.26	6.1	24,044
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.3	3.2	11	107	0.21	0.39	1.9	2.3	0.39	0.48	0.88	7.3	23,814	23,821	1.8	0.26	1.3	23,944
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.1	3.0	7.7	80	0.15	0.29	1.8	2.1	0.29	0.46	0.75	7.3	17,957	17,964	1.5	0.21	3.2	18,068

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.56	0.54	1.4	15	0.03	0.05	0.33	0.38	0.05	0.08	0.14	1.2	2,973	2,974	0.25	0.03	0.53	2,991

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.71	0.62	0.56	7.1	0.02	0.01	1.9	1.9	0.01	0.48	0.49	—	1,980	1,980	0.08	0.07	5.0	2,008
Area	1.2	1.2	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1,712	1,712	0.12	0.02	—	1,720
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	1.9	1.9	9.9	101	0.19	0.38	—	0.38	0.38	—	0.38	—	20,184	20,184	0.82	0.16	—	20,254
Total	3.9	3.7	11	111	0.21	0.40	1.9	2.3	0.40	0.48	0.88	7.3	23,909	23,917	1.8	0.26	6.1	24,044
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.70	0.62	0.61	6.4	0.02	0.01	1.9	1.9	0.01	0.48	0.49	—	1,898	1,898	0.08	0.07	0.13	1,921
Area	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1,712	1,712	0.12	0.02	—	1,720
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	1.9	1.9	9.9	101	0.19	0.38	—	0.38	0.38	—	0.38	—	20,184	20,184	0.82	0.16	—	20,254
Total	3.3	3.2	11	107	0.21	0.39	1.9	2.3	0.39	0.48	0.88	7.3	23,814	23,821	1.8	0.26	1.3	23,944

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.67	0.59	0.59	6.3	0.02	0.01	1.8	1.8	0.01	0.46	0.47	—	1,838	1,838	0.08	0.07	2.1	1,863
Area	1.1	1.0	0.02	2.1	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.7	8.7	< 0.005	< 0.005	—	8.8
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1,712	1,712	0.12	0.02	—	1,720
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	1.4	1.4	7.1	72	0.13	0.27	—	0.27	0.27	—	0.27	—	14,378	14,378	0.58	0.12	—	14,427
Total	3.1	3.0	7.7	80	0.15	0.29	1.8	2.1	0.29	0.46	0.75	7.3	17,957	17,964	1.5	0.21	3.2	18,068
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.12	0.11	0.11	1.2	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	304	304	0.01	0.01	0.34	308
Area	0.19	0.19	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	283	283	0.02	< 0.005	—	285
Water	—	—	—	—	—	—	—	—	—	—	—	0.49	3.3	3.8	0.05	< 0.005	—	5.4
Waste	—	—	—	—	—	—	—	—	—	—	—	0.73	0.00	0.73	0.07	0.00	—	2.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Off-Road	0.25	0.25	1.3	13	0.02	0.05	—	0.05	0.05	—	0.05	—	2,380	2,380	0.10	0.02	—	2,389
Total	0.56	0.54	1.4	15	0.03	0.05	0.33	0.38	0.05	0.08	0.14	1.2	2,973	2,974	0.25	0.03	0.53	2,991

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.71	0.62	0.56	7.1	0.02	0.01	1.9	1.9	0.01	0.48	0.49	—	1,980	1,980	0.08	0.07	5.0	2,008
Area	1.2	1.2	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13

Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1,712	1,712	0.12	0.02	—	1,720
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	1.9	1.9	9.9	101	0.19	0.38	—	0.38	0.38	—	0.38	—	20,184	20,184	0.82	0.16	—	20,254
Total	3.9	3.7	11	111	0.21	0.40	1.9	2.3	0.40	0.48	0.88	7.3	23,909	23,917	1.8	0.26	6.1	24,044
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.70	0.62	0.61	6.4	0.02	0.01	1.9	1.9	0.01	0.48	0.49	—	1,898	1,898	0.08	0.07	0.13	1,921
Area	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1,712	1,712	0.12	0.02	—	1,720
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	1.9	1.9	9.9	101	0.19	0.38	—	0.38	0.38	—	0.38	—	20,184	20,184	0.82	0.16	—	20,254
Total	3.3	3.2	11	107	0.21	0.39	1.9	2.3	0.39	0.48	0.88	7.3	23,814	23,821	1.8	0.26	1.3	23,944
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.67	0.59	0.59	6.3	0.02	0.01	1.8	1.8	0.01	0.46	0.47	—	1,838	1,838	0.08	0.07	2.1	1,863
Area	1.1	1.0	0.02	2.1	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.7	8.7	< 0.005	< 0.005	—	8.8
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1,712	1,712	0.12	0.02	—	1,720
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	1.4	1.4	7.1	72	0.13	0.27	—	0.27	0.27	—	0.27	—	14,378	14,378	0.58	0.12	—	14,427
Total	3.1	3.0	7.7	80	0.15	0.29	1.8	2.1	0.29	0.46	0.75	7.3	17,957	17,964	1.5	0.21	3.2	18,068
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	0.12	0.11	0.11	1.2	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	304	304	0.01	0.01	0.34	308
Area	0.19	0.19	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	283	283	0.02	< 0.005	—	285
Water	—	—	—	—	—	—	—	—	—	—	—	0.49	3.3	3.8	0.05	< 0.005	—	5.4
Waste	—	—	—	—	—	—	—	—	—	—	—	0.73	0.00	0.73	0.07	0.00	—	2.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Off-Road	0.25	0.25	1.3	13	0.02	0.05	—	0.05	0.05	—	0.05	—	2,380	2,380	0.10	0.02	—	2,389
Total	0.56	0.54	1.4	15	0.03	0.05	0.33	0.38	0.05	0.08	0.14	1.2	2,973	2,974	0.25	0.03	0.53	2,991

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.59	0.52	0.46	5.9	0.02	0.01	1.6	1.6	0.01	0.40	0.41	—	1,633	1,633	0.06	0.06	4.1	1,656
General Office Building	0.11	0.10	0.09	1.2	< 0.005	< 0.005	0.33	0.34	< 0.005	0.08	0.09	—	348	348	0.01	0.01	0.88	352

Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.71	0.62	0.56	7.1	0.02	0.01	1.9	1.9	0.01	0.48	0.49	—	1,980	1,980	0.08	0.07	5.0	2,008
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.59	0.52	0.51	5.3	0.02	0.01	1.6	1.6	0.01	0.40	0.41	—	1,565	1,565	0.07	0.06	0.11	1,584
General Office Building	0.11	0.10	0.10	1.1	< 0.005	< 0.005	0.33	0.34	< 0.005	0.08	0.09	—	333	333	0.01	0.01	0.02	337
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.70	0.62	0.61	6.4	0.02	0.01	1.9	1.9	0.01	0.48	0.49	—	1,898	1,898	0.08	0.07	0.13	1,921
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.11	0.09	0.09	1.00	< 0.005	< 0.005	0.28	0.29	< 0.005	0.07	0.07	—	262	262	0.01	0.01	0.29	266
General Office Building	0.02	0.01	0.01	0.16	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	42	42	< 0.005	< 0.005	0.05	43
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.12	0.11	0.11	1.2	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	304	304	0.01	0.01	0.34	308

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.59	0.52	0.46	5.9	0.02	0.01	1.6	1.6	0.01	0.40	0.41	—	1,633	1,633	0.06	0.06	4.1	1,656
General Office Building	0.11	0.10	0.09	1.2	< 0.005	< 0.005	0.33	0.34	< 0.005	0.08	0.09	—	348	348	0.01	0.01	0.88	352
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.71	0.62	0.56	7.1	0.02	0.01	1.9	1.9	0.01	0.48	0.49	—	1,980	1,980	0.08	0.07	5.0	2,008
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.59	0.52	0.51	5.3	0.02	0.01	1.6	1.6	0.01	0.40	0.41	—	1,565	1,565	0.07	0.06	0.11	1,584
General Office Building	0.11	0.10	0.10	1.1	< 0.005	< 0.005	0.33	0.34	< 0.005	0.08	0.09	—	333	333	0.01	0.01	0.02	337

Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.70	0.62	0.61	6.4	0.02	0.01	1.9	1.9	0.01	0.48	0.49	—	1,898	1,898	0.08	0.07	0.13	1,921
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.11	0.09	0.09	1.00	< 0.005	< 0.005	0.28	0.29	< 0.005	0.07	0.07	—	262	262	0.01	0.01	0.29	266
General Office Building	0.02	0.01	0.01	0.16	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	42	42	< 0.005	< 0.005	0.05	43
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.12	0.11	0.11	1.2	< 0.005	< 0.005	0.33	0.33	< 0.005	0.08	0.09	—	304	304	0.01	0.01	0.34	308

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	1,182	1,182	0.08	0.01	—	1,188
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	424	424	0.03	< 0.005	—	426
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,693	1,693	0.12	0.02	—	1,701
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	1,182	1,182	0.08	0.01	—	1,188
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	424	424	0.03	< 0.005	—	426
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,693	1,693	0.12	0.02	—	1,701
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	196	196	0.01	< 0.005	—	197

General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	14	14	< 0.005	< 0.005	—	15
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	70	70	< 0.005	< 0.005	—	71
Total	—	—	—	—	—	—	—	—	—	—	—	—	280	280	0.02	< 0.005	—	282

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	1,182	1,182	0.08	0.01	—	1,188
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	424	424	0.03	< 0.005	—	426
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,693	1,693	0.12	0.02	—	1,701
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	1,182	1,182	0.08	0.01	—	1,188
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	424	424	0.03	< 0.005	—	426
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,693	1,693	0.12	0.02	—	1,701
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	196	196	0.01	< 0.005	—	197
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	14	14	< 0.005	< 0.005	—	15
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	70	70	< 0.005	< 0.005	—	71
Total	—	—	—	—	—	—	—	—	—	—	—	—	280	280	0.02	< 0.005	—	282

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.1	3.1	< 0.005	< 0.005	—	3.1
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.1	3.1	< 0.005	< 0.005	—	3.1

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.1	3.1	< 0.005	< 0.005	—	3.1
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.1	3.1	< 0.005	< 0.005	—	3.1

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.55	0.51	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Total	1.2	1.2	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	0.07	0.06	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5
Total	0.19	0.19	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.55	0.51	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Total	1.2	1.2	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consum Products	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	0.06	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5
Total	0.19	0.19	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.9	13	15	0.20	< 0.005	—	22
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.99	6.7	7.7	0.10	< 0.005	—	11
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.9	13	15	0.20	< 0.005	—	22
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.99	6.7	7.7	0.10	< 0.005	—	11
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	0.32	2.2	2.5	0.03	< 0.005	—	3.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.16	1.1	1.3	0.02	< 0.005	—	1.8
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.49	3.3	3.8	0.05	< 0.005	—	5.4

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.9	13	15	0.20	< 0.005	—	22
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.99	6.7	7.7	0.10	< 0.005	—	11
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.9	13	15	0.20	< 0.005	—	22
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.99	6.7	7.7	0.10	< 0.005	—	11
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	0.32	2.2	2.5	0.03	< 0.005	—	3.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.16	1.1	1.3	0.02	< 0.005	—	1.8
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.49	3.3	3.8	0.05	< 0.005	—	5.4

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.5	0.00	1.5	0.15	0.00	—	5.1

Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.5	0.00	1.5	0.15	0.00	—	5.1
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	0.49	0.00	0.49	0.05	0.00	—	1.7
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.24	0.00	0.24	0.02	0.00	—	0.84
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.73	0.00	0.73	0.07	0.00	—	2.5

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.5	0.00	1.5	0.15	0.00	—	5.1
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.5	0.00	1.5	0.15	0.00	—	5.1

Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	0.49	0.00	0.49	0.05	0.00	—	1.7
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.24	0.00	0.24	0.02	0.00	—	0.84
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.73	0.00	0.73	0.07	0.00	—	2.5

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1

General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1

General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	1.3	1.3	6.8	68	0.13	0.26	—	0.26	0.26	—	0.26	—	13,865	13,865	0.56	0.11	—	13,913

Forklifts	0.54	0.54	2.8	28	0.05	0.11	—	0.11	0.11	—	0.11	—	5,739	5,739	0.23	0.05	—	5,759
Tractors/ Loaders/ Backhoes	0.05	0.05	0.29	4.1	0.01	0.01	—	0.01	0.01	—	0.01	—	580	580	0.02	< 0.005	—	582
Total	1.9	1.9	9.9	101	0.19	0.38	—	0.38	0.38	—	0.38	—	20,184	20,184	0.82	0.16	—	20,254
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	1.3	1.3	6.8	68	0.13	0.26	—	0.26	0.26	—	0.26	—	13,865	13,865	0.56	0.11	—	13,913
Forklifts	0.54	0.54	2.8	28	0.05	0.11	—	0.11	0.11	—	0.11	—	5,739	5,739	0.23	0.05	—	5,759
Tractors/ Loaders/ Backhoes	0.05	0.05	0.29	4.1	0.01	0.01	—	0.01	0.01	—	0.01	—	580	580	0.02	< 0.005	—	582
Total	1.9	1.9	9.9	101	0.19	0.38	—	0.38	0.38	—	0.38	—	20,184	20,184	0.82	0.16	—	20,254
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	0.17	0.17	0.89	8.9	0.02	0.03	—	0.03	0.03	—	0.03	—	1,635	1,635	0.07	0.01	—	1,641
Forklifts	0.07	0.07	0.37	3.7	0.01	0.01	—	0.01	0.01	—	0.01	—	677	677	0.03	0.01	—	679
Tractors/ Loaders/ Backhoes	0.01	0.01	0.04	0.53	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	68	68	< 0.005	< 0.005	—	69
Total	0.25	0.25	1.3	13	0.02	0.05	—	0.05	0.05	—	0.05	—	2,380	2,380	0.10	0.02	—	2,389

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	1.3	1.3	6.8	68	0.13	0.26	—	0.26	0.26	—	0.26	—	13,865	13,865	0.56	0.11	—	13,913

Forklifts	0.54	0.54	2.8	28	0.05	0.11	—	0.11	0.11	—	0.11	—	5,739	5,739	0.23	0.05	—	5,759
Tractors/ Loaders/ Backhoes	0.05	0.05	0.29	4.1	0.01	0.01	—	0.01	0.01	—	0.01	—	580	580	0.02	< 0.005	—	582
Total	1.9	1.9	9.9	101	0.19	0.38	—	0.38	0.38	—	0.38	—	20,184	20,184	0.82	0.16	—	20,254
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	1.3	1.3	6.8	68	0.13	0.26	—	0.26	0.26	—	0.26	—	13,865	13,865	0.56	0.11	—	13,913
Forklifts	0.54	0.54	2.8	28	0.05	0.11	—	0.11	0.11	—	0.11	—	5,739	5,739	0.23	0.05	—	5,759
Tractors/ Loaders/ Backhoes	0.05	0.05	0.29	4.1	0.01	0.01	—	0.01	0.01	—	0.01	—	580	580	0.02	< 0.005	—	582
Total	1.9	1.9	9.9	101	0.19	0.38	—	0.38	0.38	—	0.38	—	20,184	20,184	0.82	0.16	—	20,254
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	0.17	0.17	0.89	8.9	0.02	0.03	—	0.03	0.03	—	0.03	—	1,635	1,635	0.07	0.01	—	1,641
Forklifts	0.07	0.07	0.37	3.7	0.01	0.01	—	0.01	0.01	—	0.01	—	677	677	0.03	0.01	—	679
Tractors/ Loaders/ Backhoes	0.01	0.01	0.04	0.53	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	68	68	< 0.005	< 0.005	—	69
Total	0.25	0.25	1.3	13	0.02	0.05	—	0.05	0.05	—	0.05	—	2,380	2,380	0.10	0.02	—	2,389

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	160	160	160	58,458	2,208	2,208	2,208	805,816
General Office Building	28	6.4	2.0	7,804	471	107	34	130,189
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	160	160	160	58,458	2,208	2,208	2,208	805,816
General Office Building	28	6.4	2.0	7,804	471	107	34	130,189

Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Other Asphalt Surfaces	Wood Fireplaces	0	0
Other Asphalt Surfaces	Gas Fireplaces	0	0
Other Asphalt Surfaces	Propane Fireplaces	0	0
Other Asphalt Surfaces	Electric Fireplaces	0	0
Other Asphalt Surfaces	No Fireplaces	0	0
Other Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Pellet Wood Stoves	0	0
General Light Industry	Wood Fireplaces	0	0
General Light Industry	Gas Fireplaces	0	0
General Light Industry	Propane Fireplaces	0	0
General Light Industry	Electric Fireplaces	0	0
General Light Industry	No Fireplaces	0	0
General Light Industry	Conventional Wood Stoves	0	0
General Light Industry	Catalytic Wood Stoves	0	0
General Light Industry	Non-Catalytic Wood Stoves	0	0
General Light Industry	Pellet Wood Stoves	0	0
General Office Building	Wood Fireplaces	0	0
General Office Building	Gas Fireplaces	0	0
General Office Building	Propane Fireplaces	0	0
General Office Building	Electric Fireplaces	0	0

General Office Building	No Fireplaces	0	0
General Office Building	Conventional Wood Stoves	0	0
General Office Building	Catalytic Wood Stoves	0	0
General Office Building	Non-Catalytic Wood Stoves	0	0
General Office Building	Pellet Wood Stoves	0	0
Enclosed Parking Structure	Wood Fireplaces	0	0
Enclosed Parking Structure	Gas Fireplaces	0	0
Enclosed Parking Structure	Propane Fireplaces	0	0
Enclosed Parking Structure	Electric Fireplaces	0	0
Enclosed Parking Structure	No Fireplaces	0	0
Enclosed Parking Structure	Conventional Wood Stoves	0	0
Enclosed Parking Structure	Catalytic Wood Stoves	0	0
Enclosed Parking Structure	Non-Catalytic Wood Stoves	0	0
Enclosed Parking Structure	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	0.00	0.00	13,830	3,970	194,633

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value

Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Other Asphalt Surfaces	0.00	690	0.0489	0.0069	0.00
General Light Industry	625,000	690	0.0489	0.0069	0.00
General Office Building	46,193	690	0.0489	0.0069	58,266
Enclosed Parking Structure	224,092	690	0.0489	0.0069	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Other Asphalt Surfaces	0.00	690	0.0489	0.0069	0.00
General Light Industry	625,000	690	0.0489	0.0069	0.00
General Office Building	46,193	690	0.0489	0.0069	58,266
Enclosed Parking Structure	224,092	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Other Asphalt Surfaces	0.00	0.00
General Light Industry	1,017,500	0.00
General Office Building	515,428	5,610

Enclosed Parking Structure	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Other Asphalt Surfaces	0.00	0.00
General Light Industry	1,017,500	0.00
General Office Building	515,428	5,610
Enclosed Parking Structure	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Other Asphalt Surfaces	0.00	0.00
General Light Industry	5.5	0.00
General Office Building	2.7	0.00
Enclosed Parking Structure	0.00	0.00

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Other Asphalt Surfaces	0.00	0.00
General Light Industry	5.5	0.00
General Office Building	2.7	0.00
Enclosed Parking Structure	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
General Light Industry	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.0	4.0	18
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18

5.14.2. Mitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
General Light Industry	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.0	4.0	18
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Cranes	Diesel	Tier 4 Final	14	8.0	367	0.29
Forklifts	Diesel	Tier 4 Final	14	8.0	220	0.20
Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.0	8.0	84	0.37

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Cranes	Diesel	Tier 4 Final	14	8.0	367	0.29
Forklifts	Diesel	Tier 4 Final	14	8.0	220	0.20
Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.0	8.0	84	0.37

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.8	annual days of extreme heat
Extreme Precipitation	4.3	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	17
AQ-PM	68
AQ-DPM	100
Drinking Water	42
Lead Risk Housing	—
Pesticides	0.00
Toxic Releases	94
Traffic	64
Effect Indicators	—
CleanUp Sites	100
Groundwater	100
Haz Waste Facilities/Generators	99
Impaired Water Bodies	98
Solid Waste	97
Sensitive Population	—
Asthma	93
Cardio-vascular	62
Low Birth Weights	—

Socioeconomic Factor Indicators	—
Education	34
Housing	—
Linguistic	—
Poverty	—
Unemployment	—

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	—
Employed	—
Median HI	—
Education	—
Bachelor's or higher	—
High school enrollment	—
Preschool enrollment	—
Transportation	—
Auto Access	—
Active commuting	—
Social	—
2-parent households	—
Voting	—
Neighborhood	—
Alcohol availability	—
Park access	—
Retail density	—

Supermarket access	—
Tree canopy	—
Housing	—
Homeownership	—
Housing habitability	—
Low-inc homeowner severe housing cost burden	—
Low-inc renter severe housing cost burden	—
Uncrowded housing	—
Health Outcomes	—
Insured adults	—
Arthritis	77.8
Asthma ER Admissions	13.7
High Blood Pressure	49.4
Cancer (excluding skin)	49.7
Asthma	98.6
Coronary Heart Disease	25.9
Chronic Obstructive Pulmonary Disease	62.6
Diagnosed Diabetes	47.0
Life Expectancy at Birth	0.0
Cognitively Disabled	99.8
Physically Disabled	99.8
Heart Attack ER Admissions	32.2
Mental Health Not Good	71.0
Chronic Kidney Disease	64.9
Obesity	35.5
Pedestrian Injuries	0.0
Physical Health Not Good	61.7
Stroke	58.2

Health Risk Behaviors	—
Binge Drinking	1.0
Current Smoker	35.6
No Leisure Time for Physical Activity	70.6
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	38.0
Children	99.4
Elderly	83.1
English Speaking	0.0
Foreign-born	0.0
Outdoor Workers	98.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.2
Traffic Density	0.0
Traffic Access	23.0
Other Indices	—
Hardship	0.0
Other Decision Support	—
2016 Voting	0.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	—
Healthy Places Index Score for Project Location (b)	—
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Characteristics: Project Details	Operations run only - opening year (2029), includes employees as worker trips. Separate spreadsheet for HHDT.
Land Use	80 acre site, 73 paved asphalt, with up to four canopies and welfare facilities - plus existing office building.
Construction: Construction Phases	24 mo schedule
Construction: Dust From Material Movement	regrade for new underground utilities export approximately 270,000 CY over two phases
Construction: Trips and VMT	construction workforce up to 60 workers, Dec 2023 NOP-IS, construction hauling trips reflect defaults
Construction: On-Road Fugitive Dust	onsite travel is 50 percent paved, existing unbound crushed miscellaneous base, Dec 2023 NOP-IS
Operations: Vehicle Data	Opening Year - 160 daily worker trips for 80 employees at CalEEMod default trip length.
Operations: Fleet Mix	Default fleet mix for light industry and office uses.
Operations: Energy Use	Electricity-only for MSF in light industry - estimated by CalEEMod default mix of light ind electricity and natural gas plus electricity of parking area. Electricity and natural gas for office.
Operations: Off-Road Equipment	Opening year scenario - Diesel Tier 4 Final or CNG off-road equipment - 14 x 30,000 lb cranes. 14 x 10,000 lb forklifts. 2 x UTRs.

TIMSF - Buildout Year 2049 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

2.6. Operations Emissions by Sector, Mitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.1.2. Mitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.2. Electricity Emissions By Land Use - Mitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.2.4. Natural Gas Emissions By Land Use - Mitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.3.2. Mitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.4.2. Mitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.5.2. Mitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.6.2. Mitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.7.2. Mitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.8.2. Mitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.9.2. Mitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.9.2. Mitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.10.4. Landscape Equipment - Mitigated

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.11.2. Mitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.12.2. Mitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.13.2. Mitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.14.2. Mitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

8.1. Justifications

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	TIMSF - Buildout Year 2049
Operational Year	2049
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.5
Precipitation (days)	7.2
Location	33.74865331181583, -118.25653116526375
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4613
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.35

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Other Asphalt Surfaces	80	Acre	73	0.00	0.00	0.00	—	—

General Light Industry	4.4	1000sqft	0.10	4,400	0.00	0.00	—	Welfare buildings
General Office Building	2.9	1000sqft	0.07	2,900	400	0.00	—	750 Eldridge existing
Enclosed Parking Structure	64	1000sqft	1.5	64,000	0.00	0.00	—	Roadability canopies

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-9	Use Dust Suppressants
Construction	C-10-A	Water Exposed Surfaces
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.9	1.8	0.49	10	0.02	0.01	2.4	2.4	0.01	0.61	0.62	7.3	11,221	11,228	1.4	0.17	1.5	11,316
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.3	1.3	0.50	6.2	0.02	0.01	2.4	2.4	0.01	0.61	0.62	7.3	11,119	11,127	1.4	0.17	1.2	11,215
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.7	1.6	0.51	8.3	0.02	0.01	2.3	2.3	0.01	0.58	0.59	7.3	8,971	8,978	1.3	0.15	1.3	9,055

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.31	0.29	0.09	1.5	< 0.005	< 0.005	0.42	0.42	< 0.005	0.11	0.11	1.2	1,485	1,486	0.21	0.02	0.21	1,499

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.65	0.58	0.44	6.9	0.02	0.01	2.4	2.4	0.01	0.61	0.61	—	2,138	2,138	0.06	0.07	0.32	2,161
Area	1.2	1.2	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9,051	9,051	0.64	0.09	—	9,094
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	1.9	1.8	0.49	10	0.02	0.01	2.4	2.4	0.01	0.61	0.62	7.3	11,221	11,228	1.4	0.17	1.5	11,316
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.65	0.58	0.49	6.2	0.02	0.01	2.4	2.4	0.01	0.61	0.61	—	2,049	2,049	0.06	0.07	0.01	2,072
Area	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9,051	9,051	0.64	0.09	—	9,094
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	1.3	1.3	0.50	6.2	0.02	0.01	2.4	2.4	0.01	0.61	0.62	7.3	11,119	11,127	1.4	0.17	1.2	11,215

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.63	0.56	0.47	6.2	0.02	0.01	2.3	2.3	0.01	0.58	0.59	—	2,002	2,002	0.06	0.07	0.13	2,025
Area	1.1	1.0	0.02	2.1	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.7	8.7	< 0.005	< 0.005	—	8.8
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6,940	6,940	0.49	0.07	—	6,972
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	1.7	1.6	0.51	8.3	0.02	0.01	2.3	2.3	0.01	0.58	0.59	7.3	8,971	8,978	1.3	0.15	1.3	9,055
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.11	0.10	0.09	1.1	< 0.005	< 0.005	0.42	0.42	< 0.005	0.11	0.11	—	332	332	0.01	0.01	0.02	335
Area	0.19	0.19	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1,149	1,149	0.08	0.01	—	1,154
Water	—	—	—	—	—	—	—	—	—	—	—	0.49	3.3	3.8	0.05	< 0.005	—	5.4
Waste	—	—	—	—	—	—	—	—	—	—	—	0.73	0.00	0.73	0.07	0.00	—	2.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Off-Road	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.31	0.29	0.09	1.5	< 0.005	< 0.005	0.42	0.42	< 0.005	0.11	0.11	1.2	1,485	1,486	0.21	0.02	0.21	1,499

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.65	0.58	0.44	6.9	0.02	0.01	2.4	2.4	0.01	0.61	0.61	—	2,138	2,138	0.06	0.07	0.32	2,161
Area	1.2	1.2	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13

Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9,051	9,051	0.64	0.09	—	9,094
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	1.9	1.8	0.49	10	0.02	0.01	2.4	2.4	0.01	0.61	0.62	7.3	11,221	11,228	1.4	0.17	1.5	11,316
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.65	0.58	0.49	6.2	0.02	0.01	2.4	2.4	0.01	0.61	0.61	—	2,049	2,049	0.06	0.07	0.01	2,072
Area	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9,051	9,051	0.64	0.09	—	9,094
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	1.3	1.3	0.50	6.2	0.02	0.01	2.4	2.4	0.01	0.61	0.62	7.3	11,119	11,127	1.4	0.17	1.2	11,215
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.63	0.56	0.47	6.2	0.02	0.01	2.3	2.3	0.01	0.58	0.59	—	2,002	2,002	0.06	0.07	0.13	2,025
Area	1.1	1.0	0.02	2.1	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.7	8.7	< 0.005	< 0.005	—	8.8
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6,940	6,940	0.49	0.07	—	6,972
Water	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Waste	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Off-Road	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	1.7	1.6	0.51	8.3	0.02	0.01	2.3	2.3	0.01	0.58	0.59	7.3	8,971	8,978	1.3	0.15	1.3	9,055
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	0.11	0.10	0.09	1.1	< 0.005	< 0.005	0.42	0.42	< 0.005	0.11	0.11	—	332	332	0.01	0.01	0.02	335
Area	0.19	0.19	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1,149	1,149	0.08	0.01	—	1,154
Water	—	—	—	—	—	—	—	—	—	—	—	0.49	3.3	3.8	0.05	< 0.005	—	5.4
Waste	—	—	—	—	—	—	—	—	—	—	—	0.73	0.00	0.73	0.07	0.00	—	2.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
Off-Road	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.31	0.29	0.09	1.5	< 0.005	< 0.005	0.42	0.42	< 0.005	0.11	0.11	1.2	1,485	1,486	0.21	0.02	0.21	1,499

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.57	0.51	0.39	5.9	0.02	0.01	2.1	2.1	0.01	0.52	0.53	—	1,839	1,839	0.05	0.06	0.27	1,859
General Office Building	0.08	0.07	0.06	0.95	< 0.005	< 0.005	0.33	0.34	< 0.005	0.08	0.09	—	299	299	0.01	0.01	0.04	302

Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.65	0.58	0.44	6.9	0.02	0.01	2.4	2.4	0.01	0.61	0.61	—	2,138	2,138	0.06	0.07	0.32	2,161
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.57	0.51	0.42	5.3	0.02	0.01	2.1	2.1	0.01	0.52	0.53	—	1,763	1,763	0.05	0.06	0.01	1,783
General Office Building	0.08	0.07	0.07	0.85	< 0.005	< 0.005	0.33	0.34	< 0.005	0.08	0.09	—	286	286	0.01	0.01	< 0.005	289
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.65	0.58	0.49	6.2	0.02	0.01	2.4	2.4	0.01	0.61	0.61	—	2,049	2,049	0.06	0.07	0.01	2,072
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.10	0.09	0.08	1.0	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	—	295	295	0.01	0.01	0.02	299
General Office Building	0.01	0.01	0.01	0.12	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	36	36	< 0.005	< 0.005	< 0.005	37
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.11	0.10	0.09	1.1	< 0.005	< 0.005	0.42	0.42	< 0.005	0.11	0.11	—	332	332	0.01	0.01	0.02	335

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.57	0.51	0.39	5.9	0.02	0.01	2.1	2.1	0.01	0.52	0.53	—	1,839	1,839	0.05	0.06	0.27	1,859
General Office Building	0.08	0.07	0.06	0.95	< 0.005	< 0.005	0.33	0.34	< 0.005	0.08	0.09	—	299	299	0.01	0.01	0.04	302
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.65	0.58	0.44	6.9	0.02	0.01	2.4	2.4	0.01	0.61	0.61	—	2,138	2,138	0.06	0.07	0.32	2,161
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.57	0.51	0.42	5.3	0.02	0.01	2.1	2.1	0.01	0.52	0.53	—	1,763	1,763	0.05	0.06	0.01	1,783
General Office Building	0.08	0.07	0.07	0.85	< 0.005	< 0.005	0.33	0.34	< 0.005	0.08	0.09	—	286	286	0.01	0.01	< 0.005	289

Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.65	0.58	0.49	6.2	0.02	0.01	2.4	2.4	0.01	0.61	0.61	—	2,049	2,049	0.06	0.07	0.01	2,072
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	0.10	0.09	0.08	1.0	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	—	295	295	0.01	0.01	0.02	299
General Office Building	0.01	0.01	0.01	0.12	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	36	36	< 0.005	< 0.005	< 0.005	37
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.11	0.10	0.09	1.1	< 0.005	< 0.005	0.42	0.42	< 0.005	0.11	0.11	—	332	332	0.01	0.01	0.02	335

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	1,182	1,182	0.08	0.01	—	1,188
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	424	424	0.03	< 0.005	—	426
undefined	—	—	—	—	—	—	—	—	—	—	—	—	7,339	7,339	0.52	0.07	—	7,373
Total	—	—	—	—	—	—	—	—	—	—	—	—	9,032	9,032	0.64	0.09	—	9,075
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	1,182	1,182	0.08	0.01	—	1,188
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	424	424	0.03	< 0.005	—	426
undefined	—	—	—	—	—	—	—	—	—	—	—	—	7,339	7,339	0.52	0.07	—	7,373
Total	—	—	—	—	—	—	—	—	—	—	—	—	9,032	9,032	0.64	0.09	—	9,075
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	196	196	0.01	< 0.005	—	197
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	14	14	< 0.005	< 0.005	—	15
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	70	70	< 0.005	< 0.005	—	71
undefined	—	—	—	—	—	—	—	—	—	—	—	—	865	865	0.06	0.01	—	870
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,146	1,146	0.08	0.01	—	1,151

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	1,182	1,182	0.08	0.01	—	1,188
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	424	424	0.03	< 0.005	—	426
undefined	—	—	—	—	—	—	—	—	—	—	—	—	7,339	7,339	0.52	0.07	—	7,373

Total	—	—	—	—	—	—	—	—	—	—	—	—	9,032	9,032	0.64	0.09	—	9,075
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	1,182	1,182	0.08	0.01	—	1,188
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	87	87	0.01	< 0.005	—	88
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	424	424	0.03	< 0.005	—	426
undefined	—	—	—	—	—	—	—	—	—	—	—	—	7,339	7,339	0.52	0.07	—	7,373
Total	—	—	—	—	—	—	—	—	—	—	—	—	9,032	9,032	0.64	0.09	—	9,075
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	196	196	0.01	< 0.005	—	197
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	14	14	< 0.005	< 0.005	—	15
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	70	70	< 0.005	< 0.005	—	71
undefined	—	—	—	—	—	—	—	—	—	—	—	—	865	865	0.06	0.01	—	870
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,146	1,146	0.08	0.01	—	1,151

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19

Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.1	3.1	< 0.005	< 0.005	—	3.1
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.1	3.1	< 0.005	< 0.005	—	3.1

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
General Office Building	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.1	3.1	< 0.005	< 0.005	—	3.1

Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.1	3.1	< 0.005	< 0.005	—	3.1

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.55	0.51	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Total	1.2	1.2	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coating	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	0.06	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5
Total	0.19	0.19	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape Equipment	0.55	0.51	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Total	1.2	1.2	0.03	3.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13	13	< 0.005	< 0.005	—	13
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.68	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	0.06	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5
Total	0.19	0.19	< 0.005	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.4	1.4	< 0.005	< 0.005	—	1.5

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.9	13	15	0.20	< 0.005	—	22
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.99	6.7	7.7	0.10	< 0.005	—	11
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.9	13	15	0.20	< 0.005	—	22
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.99	6.7	7.7	0.10	< 0.005	—	11
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	0.32	2.2	2.5	0.03	< 0.005	—	3.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.16	1.1	1.3	0.02	< 0.005	—	1.8
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.49	3.3	3.8	0.05	< 0.005	—	5.4

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.9	13	15	0.20	< 0.005	—	22
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.99	6.7	7.7	0.10	< 0.005	—	11
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	1.9	13	15	0.20	< 0.005	—	22
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.99	6.7	7.7	0.10	< 0.005	—	11
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.9	20	23	0.30	0.01	—	32
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	0.32	2.2	2.5	0.03	< 0.005	—	3.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.16	1.1	1.3	0.02	< 0.005	—	1.8
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.49	3.3	3.8	0.05	< 0.005	—	5.4

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.5	0.00	1.5	0.15	0.00	—	5.1
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.5	0.00	1.5	0.15	0.00	—	5.1
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	0.49	0.00	0.49	0.05	0.00	—	1.7
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.24	0.00	0.24	0.02	0.00	—	0.84
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.73	0.00	0.73	0.07	0.00	—	2.5

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.5	0.00	1.5	0.15	0.00	—	5.1
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	2.9	0.00	2.9	0.29	0.00	—	10
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.5	0.00	1.5	0.15	0.00	—	5.1
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.4	0.00	4.4	0.44	0.00	—	15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	0.49	0.00	0.49	0.05	0.00	—	1.7
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.24	0.00	0.24	0.02	0.00	—	0.84
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.73	0.00	0.73	0.07	0.00	—	2.5

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.1	1.1
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.2	1.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Light Industry	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Forklifts	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Tractors/ Loaders/ Backhoes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Forklifts	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Tractors/ Loaders/ Backhoes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Forklifts	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Tractors/ Loaders/ Backhoes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Forklifts	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Tractors/ Loaders/ Backhoes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Forklifts	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Tractors/ Loaders/ Backhoes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Forklifts	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Tractors/ Loaders/ Backhoes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	210	210	210	76,654	2,895	2,895	2,895	1,056,638
General Office Building	28	6.4	2.0	7,804	471	107	34	130,189
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
General Light Industry	210	210	210	76,654	2,895	2,895	2,895	1,056,638
General Office Building	28	6.4	2.0	7,804	471	107	34	130,189
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Other Asphalt Surfaces	Wood Fireplaces	0	0
Other Asphalt Surfaces	Gas Fireplaces	0	0
Other Asphalt Surfaces	Propane Fireplaces	0	0
Other Asphalt Surfaces	Electric Fireplaces	0	0
Other Asphalt Surfaces	No Fireplaces	0	0
Other Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Pellet Wood Stoves	0	0
General Light Industry	Wood Fireplaces	0	0
General Light Industry	Gas Fireplaces	0	0
General Light Industry	Propane Fireplaces	0	0
General Light Industry	Electric Fireplaces	0	0
General Light Industry	No Fireplaces	0	0
General Light Industry	Conventional Wood Stoves	0	0
General Light Industry	Catalytic Wood Stoves	0	0
General Light Industry	Non-Catalytic Wood Stoves	0	0

General Light Industry	Pellet Wood Stoves	0	0
General Office Building	Wood Fireplaces	0	0
General Office Building	Gas Fireplaces	0	0
General Office Building	Propane Fireplaces	0	0
General Office Building	Electric Fireplaces	0	0
General Office Building	No Fireplaces	0	0
General Office Building	Conventional Wood Stoves	0	0
General Office Building	Catalytic Wood Stoves	0	0
General Office Building	Non-Catalytic Wood Stoves	0	0
General Office Building	Pellet Wood Stoves	0	0
Enclosed Parking Structure	Wood Fireplaces	0	0
Enclosed Parking Structure	Gas Fireplaces	0	0
Enclosed Parking Structure	Propane Fireplaces	0	0
Enclosed Parking Structure	Electric Fireplaces	0	0
Enclosed Parking Structure	No Fireplaces	0	0
Enclosed Parking Structure	Conventional Wood Stoves	0	0
Enclosed Parking Structure	Catalytic Wood Stoves	0	0
Enclosed Parking Structure	Non-Catalytic Wood Stoves	0	0
Enclosed Parking Structure	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	0.00	0.00	13,830	3,970	194,633

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00

Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Other Asphalt Surfaces	0.00	690	0.0489	0.0069	0.00
General Light Industry	625,000	690	0.0489	0.0069	0.00
General Office Building	46,193	690	0.0489	0.0069	58,266
Enclosed Parking Structure	224,092	690	0.0489	0.0069	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Other Asphalt Surfaces	0.00	690	0.0489	0.0069	0.00
General Light Industry	625,000	690	0.0489	0.0069	0.00
General Office Building	46,193	690	0.0489	0.0069	58,266
Enclosed Parking Structure	224,092	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Other Asphalt Surfaces	0.00	0.00
General Light Industry	1,017,500	0.00
General Office Building	515,428	5,610
Enclosed Parking Structure	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Other Asphalt Surfaces	0.00	0.00
General Light Industry	1,017,500	0.00
General Office Building	515,428	5,610
Enclosed Parking Structure	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Other Asphalt Surfaces	0.00	0.00
General Light Industry	5.5	0.00
General Office Building	2.7	0.00
Enclosed Parking Structure	0.00	0.00

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Other Asphalt Surfaces	0.00	0.00
General Light Industry	5.5	0.00
General Office Building	2.7	0.00

Enclosed Parking Structure	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
General Light Industry	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.0	4.0	18
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18

5.14.2. Mitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
General Light Industry	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.0	4.0	18
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Cranes	Electric	Average	14	8.0	367	0.29
Forklifts	Electric	Average	14	8.0	82	0.20

Tractors/Loaders/Backhoes	Electric	Average	2.0	8.0	84	0.37

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Cranes	Electric	Average	14	8.0	367	0.29
Forklifts	Electric	Average	14	8.0	82	0.20
Tractors/Loaders/Backhoes	Electric	Average	2.0	8.0	84	0.37

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.8	annual days of extreme heat
Extreme Precipitation	4.3	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	17
AQ-PM	68
AQ-DPM	100
Drinking Water	42
Lead Risk Housing	—
Pesticides	0.00
Toxic Releases	94
Traffic	64
Effect Indicators	—
CleanUp Sites	100
Groundwater	100
Haz Waste Facilities/Generators	99
Impaired Water Bodies	98
Solid Waste	97

Sensitive Population	—
Asthma	93
Cardio-vascular	62
Low Birth Weights	—
Socioeconomic Factor Indicators	—
Education	34
Housing	—
Linguistic	—
Poverty	—
Unemployment	—

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	—
Employed	—
Median HI	—
Education	—
Bachelor's or higher	—
High school enrollment	—
Preschool enrollment	—
Transportation	—
Auto Access	—
Active commuting	—
Social	—
2-parent households	—
Voting	—

Neighborhood	—
Alcohol availability	—
Park access	—
Retail density	—
Supermarket access	—
Tree canopy	—
Housing	—
Homeownership	—
Housing habitability	—
Low-inc homeowner severe housing cost burden	—
Low-inc renter severe housing cost burden	—
Uncrowded housing	—
Health Outcomes	—
Insured adults	—
Arthritis	77.8
Asthma ER Admissions	13.7
High Blood Pressure	49.4
Cancer (excluding skin)	49.7
Asthma	98.6
Coronary Heart Disease	25.9
Chronic Obstructive Pulmonary Disease	62.6
Diagnosed Diabetes	47.0
Life Expectancy at Birth	0.0
Cognitively Disabled	99.8
Physically Disabled	99.8
Heart Attack ER Admissions	32.2
Mental Health Not Good	71.0
Chronic Kidney Disease	64.9

Obesity	35.5
Pedestrian Injuries	0.0
Physical Health Not Good	61.7
Stroke	58.2
Health Risk Behaviors	—
Binge Drinking	1.0
Current Smoker	35.6
No Leisure Time for Physical Activity	70.6
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	38.0
Children	99.4
Elderly	83.1
English Speaking	0.0
Foreign-born	0.0
Outdoor Workers	98.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.2
Traffic Density	0.0
Traffic Access	23.0
Other Indices	—
Hardship	0.0
Other Decision Support	—
2016 Voting	0.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	—

Healthy Places Index Score for Project Location (b)	—
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Characteristics: Project Details	Operations run only - at buildout (2049), includes employees as worker trips. Separate spreadsheet for HHDT.
Land Use	80 acre site, 73 paved asphalt, with up to four canopies and welfare facilities - plus existing office building.
Construction: Construction Phases	24 mo schedule
Construction: Dust From Material Movement	regrade for new underground utilities export approximately 270,000 CY over two phases
Construction: Trips and VMT	construction workforce up to 60 workers, Dec 2023 NOP-IS, construction hauling trips reflect defaults
Construction: On-Road Fugitive Dust	onsite travel is 50 percent paved, existing unbound crushed miscellaneous base, Dec 2023 NOP-IS
Operations: Vehicle Data	Buildout Year - 210 daily worker trips for 105 employees at CalEEMod default trip length.
Operations: Fleet Mix	Default fleet mix for light industry and office uses.

Operations: Energy Use	Electricity-only for MSF in light industry - estimated by CalEEMod default mix of light ind electricity and natural gas plus electricity of parking area. Electricity and natural gas for office.
Operations: Off-Road Equipment	Buildout year scenario - all Zero-Emissions off-road equipment - 14 x 30,000 lb cranes. 14 x 10,000 lb forklifts. 2 x UTRs.

Appendix B2
Health Risk Assessment

Terminal Is. MSF - AERMOD Input / Settings

Source Type = AREA Configuration

Scenario : onsite DPM during construction represented by one AREA source

1	# of AREA sources in model			
72	acres for on-site truck idling and HDT movement			
72	acre per AREA	Rel Height (cen)	SyInit	SzInit
291384	m sq.	(m)	(m)	(m)
539.80	(m) side of square per VOL or AREA	4	125.53	1.86
		(12-ft tailpipe		(6-ft vert mix tailpipes

539.80 (m) side of square per VOL or AREA
125.53 sigma-y max
[for VOL Source: sigma-y < (dist vol.center-to-ambient) / 2.15 factor]

[Ref: SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (2003)
[On-site truck activity as AREA sources width = actual plus 3 meter wake each side, release Ht = 4 m for Szinit = 1.86 (ARB 2006 Ports DPM Study)
[Option: Use of volume sources for mobile configurations (SCAQMD, 2003), construction spread & overlapping to make roadway segments (EPA 2015 Transp Conformity Gude Appxs).

AERMOD Input / Output Summary

Source Type = AREA Configuration

Modeled Emission Rates	**DPM (ton/year)**
Construction Emissions, year 1	0.15
Construction Emissions, year 2	0.12
Operation Emissions, opening year	0.11

Modeled Emission Rates	**Q, DPM (g/s)**
Construction Emissions, year 1	0.0043151
Construction Emissions, year 2	0.0034521
Operation Emissions, opening year	0.0031644

**AERMOD Input >>>>

Initial Screening, Operation-phase Results

Summary Annual Average Concentration (DPM)

	Initial Screening Annual (DPM)	
	Residential (ug/m3)	Worker (ug/m3)
	0.00061	0.01637

Initial Screening (DPM)

Risk Assessment (SCAQMD 2017), Screening, Maximum Individual Cancer Risk (DPM)

		Residential	Worker	
	Inhalation Cancer Potency (CP) Factor [(mg/kg-day)^-1] :	1.1	1.1	Ref 1.
	SCAQMD Table 4.1_ or 4.2_ = CEF (unitless) :	677.4	55.86	Ref 2.
For MICR from CEFr, per SCAQMD Risk Assessment Procedures for Rules 1401 et al	MICR :	4.57E-07	1.01E-06	
MICR = Cancer Potency (CP) x Dose (D) x 10-6	*^^^^ CEF's for lifetime exposure - not scaled to short-term construction*			
or, MICR = CP x concentration x CEFr x MPr x 10^-6				
where MPr = 1.0 for multi-pathway exposure, as only DPM				
CEFr or CEFw = Combined Exposure Factor, residential or worker				

Screen for Info Only, using pre-OEHHA 2015 and DPM unit risk factor

		Residential	Worker	
Cancer risk w/o age-specific sensitivity factors (pre-OEHHA 2015)	Inhalation Unit Risk Factor [(ug/m3)^-1] :	3.00E-04	3.00E-04	Ref 1.
For comparison with results per Hot Spots program	Cancer Risk w/o worker adjustment, DBR, or ASF's :	1.84E-07	4.91E-06	
Age sensitivity factors (ASFs) take into account the increased sensitivity to carcinogens during early-in-life exposure (OEHHA 2015)				

		Residential	Worker	
Chronic, non-cancer health effects	Reference Exposure Level (REL), Chronic Inhalation [ug/m3] :	5.00E+00	5.00E+00	Ref 1.
	Chronic Hazard Index :	0.000122778	0.003273238	

Ref 1: OEHHA, 2023 - Table 1. CONSOLIDATED TABLE OF OEHHA/ARB APPROVED RISK ASSESSMENT HEALTH VALUES

Ref 2: SCAQMD, 2017 - Table 4.1 D (resid.) or Table 4.2 D (worker) in SCAQMD PERMIT APPLICATION PACKAGE "N" for use in conjunction with Risk Assessment Procedures (Version 8.1).

Screening Level (SCAQMD, 2017), Cancer Burden Estimate

			2.25	km - radius of zone of impact, where > 1 in one million
Default worst-case population density	7,000 ppl/km2		15.9043	km2 - area of zone, where > 1 in one million
	4.57E-07 MICR	Cancer Burden :	0.051	= MICR * total residential population in the zone

Ref: SCAQMD, 2017 - "INSTRUCTIONS FOR CALCULATING CANCER BURDEN" in RISK ASSESSMENT PROCEDURES for Rules 1401, 1401.1 and 212 (Version 8.1).

Health Risk Assessment, Results Summary

Exposure Period and Intake Rate Scenarios for Use in HARP2 RAST

Residential, Cancer - 30 yr. "RMP Using the Derived Method" w/ SCAQMD mandatory minimum pathways
Residential, Non-cancer - "OEHHA Derived Method"
Worker, Cancer - 25 yr. "OEHHA Derived Method"
Worker, Non-cancer - "OEHHA Derived Method"
Ref: SCAQMD, 2024. "AB 2588 and Rule 1402 Supplemental Guidelines" (September 2024, Table 7).

		Residential	Worker
Exposure Scenarios		**DPM**	**DPM**
ages : years		(ug/m3)	(ug/m3)
3rd trim - one	Construction Emissions, year 1	0.00084	0.02232
one - two	Construction Emissions, year 2	0.00067	0.01785
3 to end of exposure	Operation Emissions, opening year	0.00061	0.01637

Summary HARP, Ouput from RAST (Cancer Risk)

INDEX	GRP1	POLID	POLABBREV	CONC	RISK_SUM	SCENARIO	DETAILS	INH_RISK
*HARP - HRACalc v22118 12/22/2025 12:17:04 PM - Cancer Risk - Input File: C:\B_disp\3571.5-laxt\rast-dpm\Resid_y0_HRAInput.hra								
1	Resid_y0	9901	DieselExhPM	0.00084	1.4939E-07	1YrCancerRMP_InhSoilDermMMilkCrops_FAH16to70	*	1.4939E-07
*HARP - HRACalc v22118 12/22/2025 12:19:07 PM - Cancer Risk - Input File: C:\B_disp\3571.5-laxt\rast-dpm\Resid_y1_HRAInput.hra								
1	Resid_y1	9901	DieselExhPM	6.70E-04	1.1005E-07	1YrCancerRMP_InhSoilDermMMilkCrops_FAH16to70	*	1.1005E-07
*HARP - HRACalc v22118 12/22/2025 12:20:23 PM - Cancer Risk - Input File: C:\B_disp\3571.5-laxt\rast-dpm\Resid_y2_HRAInput.hra								
1	Resid_y2	9901	DieselExhPM	6.10E-04	2.4534E-07	28YrCancerRMP_InhSoilDermMMilkCrops_FAH16to70	*	2.4534E-07

Residential, Total Cancer Risk
5.0478E-07

*HARP - HRACalc v22118 12/22/2025 12:29:59 PM - Cancer Risk - Input File: C:\B_disp\3571.5-laxt\rast-dpm\Worker_HRAInput.hra								
INDEX	GRP1	POLID	POLABBREV	CONC	RISK_SUM	SCENARIO	DETAILS	INH_RISK
1	Worker	9901	DieselExhPM	0.02232	1.3814E-06	25YrCancerDerived_InhSoilDermMMilkCrops	*	1.3814E-06

Summary HARP, Ouput from RAST (Non-cancer Chronic Risk)

*HARP - HRACalc v22118 12/22/2025 12:17:04 PM - Chronic Risk - Input File: C:\B_disp\3571.5-laxt\rast-dpm\Resid_y0_HRAInput.hra						
INDEX	GRP1	POLID	POLABBREV	CONC	SCENARIO	RESP
1	Resid_y0	9901	DieselExhPM	0.00084	NonCancerChronicDerived_InhSoilDermMMilkCrops	0.000168

*HARP - HRACalc v22118 12/22/2025 12:29:59 PM - Chronic Risk - Input File: C:\B_disp\3571.5-laxt\rast-dpm\Worker_HRAInput.hra						
INDEX	GRP1	POLID	POLABBREV	CONC	SCENARIO	RESP
1	Worker	9901	DieselExhPM	0.02232	NonCancerChronicDerived_InhSoilDermMMilkCrops	0.004464

Appendix C

California Coastal Act Consistency Analysis

TERMINAL ISLAND MARITIME SUPPORT FACILITY
California Coastal Act Consistency Analysis

Introduction

The California Coastal Act (CCA) established the California Coastal Commission (CCC) and created a State and local government partnership to ensure that public concerns regarding coastal development are addressed. The CCC has regulatory jurisdiction over the coastal zone, which extends seaward to the State's outer limit of jurisdiction (three nautical miles), including offshore islands, and inland generally 1,000 yards from the mean high tide line of the sea. Most of the Port of Los Angeles (POLA) is located within the coastal zone.

To enforce the CCA, local governments in coastal areas are required to develop Local Coastal Programs (LCPs) as part of their general plans. LCPs serve as local governments' land use plans, zoning ordinances, zoning district maps, and identify specific requirements for development within the coastal zone. The CCA provides rules for California ports outlined in Chapter 8 (Sections 30700-30721). A Port Master Plan (PMP) carries out the provisions of Chapter 8 of the CCA. The CCC originally certified the Port of Los Angeles Master Plan (POLA PMP) in 1980. The PMP establishes policies and guidelines to direct the future development of the POLA. The POLA PMP is designed to better promote and safely accommodate foreign and domestic waterborne commerce, navigation, and fisheries in the national, state, and local public interests. The POLA PMP also provides for public recreation facilities and visitor serving areas to facilitate public access to the waterfront and better integrate the Port with the surrounding community, consistent with the State Tidelands Trust.

CCA Consistency Analysis

Chapter 3 of the CCA identifies a number of planning and management policies for the preservation of coastal resources, with specific articles pertaining to general standards, public access, recreation, the marine environment, land resources, development and industry, and sea level rise. The relevant policies from Chapter 3 (Sections 30210-30270) and their relationship to the Proposed Project are discussed below.

Section 30211. Development not to interfere with access

Section 30211 of the CCA prevents development from interfering with public access to the sea where acquired through use or legislation; including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

The Proposed Project would not be sited on an existing beach, nor would it preclude public access to the sea. As such, the Proposed Project would be consistent with Section 30211 of the CCA.

Section 30231. Biological productivity; water quality

Section 30231 of the CCA stipulates that biological productivity and water quality should be maintained or restored, thereby:

> *…minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

Ground--disturbing construction activities would not occur in close proximity to the water as the Project site is separated by the railroad tracks and Terminal Way (approximately 400 feet). Additionally, the Proposed Project would be subject to the requirements of the National Pollutant Discharge Elimination System (NPDES) Stormwater Program, which include obtaining coverage under the General Permit for Discharges of Stormwater

Associated with Construction Activity and the development and implementation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP). Construction and operations may involve a slight increase of runoff and/or interference with surface waterflow due to the addition of new impervious areas; however, the existing storm drain system would convey flows off site, and the Proposed Project may install a Low-Impact-Development-compliant drainage system or alternative artificial infiltration drainage system that would ensure additional flow capacity and proper conveyance of surface runoff. The Proposed Project would not deplete ground water supplies, discourage waste water reclamation, or infringe upon vegetation buffer areas or natural streams. Therefore, the Proposed Project is consistent with Section 30231 of the CCA.

Section 30232. Oil and hazardous substance spills

Section 30232 of the CCA mandates that protection against spills must be provided for any development involving the transport or use of oil or hazardous substances; and, if accidental spills do occur, that effective containment and cleanup procedures be provided.

The Proposed Project would involve limited transport, storage, use, and disposal of oil and hazardous substances during construction and operation. When not in use, these substances would be stored in an appropriate manner to prevent spills as required by State and local regulations. Additionally, standard best management practices and the Project-specific SWPPP would be implemented to minimize the risk of spills and contain and clean up any accidental spills that may occur. Mobile fuel service trucks would provide diesel and propane for on-site yard equipment during operations until 100 percent of yard equipment is transitioned to zero-emissions by January 1, 2030 per Project Feature (PF) AQ-1 (*Zero-Emission Operational Equipment*); all cargo-handling equipment would be zero-emission at the start of operations per mitigation measure (MM) AQ-1 (*Zero-Emission Cargo-Handling Equipment*). Mobile fuel service trucks would comply with all applicable regulations, including the US Environmental Protection Agency Spill Prevention, Control, and Countermeasure Regulation and the California Code of Regulations for hazardous materials management. The transport of diesel fuel to the Project site would comply with all applicable regulations regarding the shipment of hazardous materials on California highways and roads to ensure safe handling and minimize the likelihood of hazardous releases from transportation. As such, the Proposed Project is consistent with Section 30232 of the CCA.

Section 30240. Environmentally sensitive habitat areas; adjacent developments

Section 30240 of the CCA requires the protection of environmentally sensitive habitat areas (ESHAs), stipulating that development in areas adjacent to ESHAs must be sited and designed to avoid negative impacts. ESHAs are areas that contain plants, animals, or habitats that are either rare or especially valuable because of their special nature or role in an ecosystem, and which could be easily disturbed or degraded by human activities and developments.

While it is in the coastal zone, the Project site and adjacent areas are heavily disturbed, with container storage activities having occurred at the site as recently as 2023 and do not contain ESHAs. No sensitive wildlife or vegetation communities were identified on the Project site according to the Terrestrial Biological Characterization Survey completed for the Proposed Project (LAHD, 2023a). Therefore, the Proposed Project would be consistent with Section 30240 of the CCA. The nearest ESHA, eelgrass, is approximately 400 feet east of the Project site in Seaplane Lagoon, separated by the existing railroad tracks (LAHD, 2018a). There is no site drainage towards Seaplane Lagoon.

Section 30244. Archaeological or paleontological resources

Section 30244 of the CCA requires mitigation measures for development that would adversely impact archaeological or paleontological resources.

The Proposed Project is sited in the northern portion of Terminal Island, an artificial landform composed of harbor dredged material and industrial-grade fill. Background archival research did not identify the presence of any historically eligible, listed, or unique archaeological resources on or near the Project site (LAHD, 2023b). As such, the Proposed Project would not impact archaeological or paleontological resources and is thus consistent with Section 30244 of the CCA.

Section 30250. Location; existing developed area

Section 30250 of the CCA mandates that new residential, commercial, or industrial development be located within, contiguous with, or in close proximity to existing developed areas where it will not have significant adverse effects on coastal resources.

As mentioned above, the Proposed Project would be located on harbor dredged material and artificial fill at a site that has been used for container storage purposes as recently as 2023, would not prevent public access to the coast, and would implement a variety of measures to prevent runoff and spills of hazardous materials into harbor waters. Thus, the Proposed Project is consistent with Section 30250 of the CCA.

Section 30253. Minimization of adverse impacts

Section 30253 of the CCA establishes the following five requirements for new development:

(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

(c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.

(d) Minimize energy consumption and vehicle miles traveled.

(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

The Proposed Project is not sited in proximity to a known earthquake fault (closest is Palos Verdes Fault 0.5 mile away), is on flat ground that is not susceptible to landslides, and would incorporate modern engineering and safety standards in the Project design, thereby minimizing the risk of geologic hazard. The Project site is not located within a Federal Emergency Management Agency (FEMA) Flood Hazard Zone, and the Proposed Project would grade the site to generally match surrounding grades and install drainage systems, minimizing the risk of flood hazard. The Project site is not located in a CAL FIRE Fire Hazard Severity Zone (CAL FIRE, 2026). Prior to and during construction, coordination with the City of Los Angeles Fire Department (LAFD) would ensure that access for emergency service vehicles would be maintained, and that all relevant City of Los Angeles Municipal Code (LAMC) sections regarding fire safety would be followed, during construction activities. During operations, on-site fire hydrants would provide water for fire suppression and ongoing coordination would be maintained with the LAFD regarding testing and maintenance of fire prevention infrastructure as outlined in the LAMC, minimizing risk of fire hazard.

Project construction would comply with the NPDES Stormwater Program and a Project-specific SWPPP, minimizing the risk of erosion during construction. Additionally, incorporation of modern standard engineering and safety standards in Project design and compliance with Los Angeles Harbor Department (LAHD) engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse geological effects. The Project site is not on a bluff or cliff requiring protective devices.

Final Environmental Impact Report (EIR) Sections 3.1, *Air Quality*, and 3.3, *Greenhouse Gas Emissions* evaluated the Proposed Project's consistency with a variety of requirements imposed by the South Coast Air Quality Management District and California Air Resources Board. The Final EIR analysis found that the Proposed Project would not conflict with or obstruct implementation of an applicable air quality plan or plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Final EIR Section 3.2, Energy evaluated the Proposed Project's potential to result in significant environmental impacts due to wasteful, inefficient, or unnecessary energy consumption. The Final EIR analysis found that the Proposed Project would not result in wasteful or inefficient energy consumption, and included Project Feature (PF) AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) to reduce impacts related to air pollutant emissions by requiring zero-emission yard and cargo-handling equipment during operations. In addition, as discussed in the Notice of Preparation/Initial Study (Section 5.17, *Transportation*) the Proposed Project would generate 11.0 daily work VMT per employee, which is below the Los Angeles Department of Transportation's Transportation Assessment Guidelines threshold of 12.3 daily work VMT per employee for the Harbor Area Planning Commission area.

The Project site is within Planning Area 3 of the PMP, which primarily supports container operations and other industrial activities. No special communities or neighborhoods are present on Terminal Island. As such, the Proposed Project would be consistent with Section 30253 of the CCA.

Section 30255. Priority of coastal-dependent developments

Section 30255 of the CCA requires that coastal-dependent developments have priority over other developments near the shoreline and shall not be sited in a wetland. Coastal-related developments shall be located within reasonable proximity to the coastal-dependent uses they support.

The Proposed Project would provide an off-terminal chassis support facility that would increase the overall efficiency of goods movement within the Port. As such, the Proposed Project is a coastal-related development located within reasonable proximity to the coastal-dependent goods movement uses of the Port. The Proposed Project is not located in a wetland. Accordingly, the Proposed Project is consistent with Section 30255 of the CCA.

Section 30270. Sea level rise

Section 30270 of the CCA requires that sea level rise be taken into account in the planning and management of coastal resources.

The Proposed Project is sited adjacent to, but not directly bordering, the harbor waters at the POLA. Existing cargo rail tracks, as well as Terminal Way, an existing road, run along the southern and eastern borders of the Project site, separating it from the coastal edge of Terminal Island. The Sea Level Rise Adaptation Study prepared by LAHD evaluates the potential for adverse effects on coastal resources and surrounding communities stemming from sea level rise (SLR). The study found that SLR alone would not cause permanent inundation or shoreline overtopping at the Project site (LAHD, 2018b). However, the study found that SLR could, in combination with storm tide conditions, temporarily flood low lying areas within the Project site and access routes surrounding the site, inundating the Project site and temporarily interrupting Project operations. As such, the Project would operate under various contingency and emergency prevention and response plans that would mandate shutdown of infrastructure such as gas lines and electrical facilities in anticipation of flooding. These plans would minimize risk of gas line rupture and electrical hazard in an SLR flooding scenario. Although site access could be blocked by SLR flood conditions, vehicle movement would be able to resume within a matter of hours once flood waters have receded. Accordingly, SLR does not pose a substantial structural risk to the Proposed Project. Additionally, the Proposed Project would not include the storage or use of hazardous materials in quantities that would cause an adverse effect to nearby facilities or

communities if released during SLR flood conditions. Thus, the Proposed Project would be consistent with Section 30270 of the CCA.

Additionally, Chapter 8 of the CCA recognizes California ports, including POLA, as primary economic and coastal resources that are essential elements of the national maritime industry (Section 30701[a]). CCA Article 2 of Chapter 8 establishes policies governing port operations, including the protection of commercial fishing within port areas, diking, filling, and dredging, and tanker terminals (Sections 30702-30707). These policies are listed below, and their relationship to the Proposed Project are discussed.

Section 30702. Public Policy

~~The Proposed Project would develop a chassis support facility providing services such as chassis storage/ support and wheeled empty container storage for marine terminals across the POLA.~~ Section 30702 of the CCA states:

> *…the policies of the state with respect to providing for port-related developments consistent with coastal protection in the port areas to which this chapter applies, which require no commission permit after certification of a port master plan and which, except as provided in Section 30715, are not appealable to the commission after certification of a master plan, are set forth in this chapter.*

The Proposed Project would develop a chassis support facility providing services such as chassis storage/ support and wheeled empty container storage for marine terminals across the POLA. The proposed improvements at the existing site are not among the appealable project categories in Section 30715 of Chapter 8 of the CCA (see discussion of Section 30715 that follows). As such, the Proposed Project would be consistent with Section 30702 of the CCA.

Section 30703. Protection of Commercial Fishing Harbor Space

Section 30703 of the CCA states that ports shall not eliminate or reduce existing commercial fishing harbor space, unless the demand for commercial fishing facilities no longer exists or adequate space has been provided. Proposed recreational boating facilities within port areas shall, to the extent feasible, be designed and located in such fashion as not to interfere with the needs of the commercial fishing industry.

The Proposed Project does not involve the elimination, reduction, or use of existing commercial fishing space or recreational boating facilities. Therefore, the Proposed Project is consistent with Section 30703 of the CCA.

Section 30705. Diking, Filling, or Dredging Water Areas

Section 30705 states that diking, filling, and dredging may occur when consistent with the certified PMP for a variety of purposes including the construction and modification of facilities required for the safety and accommodation of the vessels served by the port, the construction and modification of commercial fishing and recreational boating facilities, public service purposes involving utilities, mineral extraction, and nature study.

The Proposed Project does not involve the diking, filling, or dredging of water areas. As such, the Proposed Project would be consistent with Section 30705.

Section 30706. Fill

Section 30706 contains four conditions that govern fill:

> *(a) The water area to be filled shall be the minimum necessary to achieve the purpose of the fill.*
>
> *(b) The nature, location, and extent of any fill, including the disposal of dredge spoils within an area designated for fill, shall minimize harmful effects to coastal resources, such as water quality, fish or wildlife resources, recreational resources, or sand transport systems, and shall minimize reductions of the volume, surface area, or circulation of water.*
>
> *(c) The fill is constructed in accordance with sound safety standards which will afford reasonable protection to persons and property against the hazards of unstable geologic or soil conditions or of flood or storm waters.*
>
> *(d) The fill is consistent with navigational safety.*

The Proposed Project does not involve the fill of water areas and would thus be consistent with the conditions listed under Section 30706 of the CCA.

Section 30707. Tanker Terminals

Section 30707 contains four conditions that govern tanker terminals:

> *(a) Minimize the total volume of oil spilled.*
>
> *(b) Minimize the risk of collision from movement of other vessels.*
>
> *(c) Have ready access to the most effective feasible oil spill containment and recovery equipment.*
>
> *(d) Have onshore deballasting facilities to receive any fouled ballast water from tankers where operationally or legally required.*

The Proposed Project would not involve the development of a new or expansion of an existing tanker terminal and would not involve the use of vessels; therefore, the Proposed Project would not conflict with Section 30707 of the CCA.

Section 30708. Location, Design and Construction of Port-related Developments

All port-related developments shall be located, designed, and constructed so as to:

> *a) Minimize substantial adverse environmental impacts.*

The California Environmental Quality Act (CEQA) requires LAHD, as the CEQA Lead Agency, to evaluate and disclose the potential environmental impacts of the Proposed Project and propose feasible alternatives or mitigation measures that avoid, eliminate, or reduce Project-related environmental impacts. Section 2, *Project Description*, describes in detail the history of the site and existing setting. A detailed discussion of the Project's characteristics is provided in Section 2.5, including a description of the Proposed Project's construction activities, equipment, schedule, and design.

Section 3, *Environmental Analysis*, provides detailed discussion of the environmental analyses and significance impacts for each environmental resource area evaluated for the Proposed Project. EIR Section 3.1, *Air Quality and Health Risk*, identifies a significant and unavoidable impact stemming from operational emissions of NOx exceeding South Coast Air Quality Management District (SCAQMD) peak day regional emissions

threshold for both the opening year (2029~~7~~) and buildout year (2049~~6~~) conditions. While it is possible that statutes such as the California Air Resources Board Advanced Clean Trucks and Advanced Clean Fleets regulations may result in accelerated conversion from traditional gas engine trucks to electric or other zero-emission models, it is currently unknown to what degree this conversion would affect the operations of the Proposed Project. To reduce operational NO_X emissions, ~~Project Feature (~~PF~~)~~ AQ-1 (*Zero-Emissions Operational Equipment*) would require a 100 percent transition to zero-emissions equipment by January 1, 2030, and any non-conforming equipment would be a breach of the Permit/Lease. Additionally, ~~mitigation measure (~~MM~~)~~ AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would require zero emission off-road cargo-handling equipment to be utilized at the start of Project operations. However, mitigation of operational NO_X emissions may have limited feasibility depending on Tenant capabilities, and NO_X emissions may still be significant until January 1, 2030. As such, NO_X impacts are determined to be significant and unavoidable even with implementation of all feasible mitigation.

EIR Section 3.3, *GHG Emissions*, discusses the Project's potentially significant impact from the generation of GHG emissions during construction and operations. MM GHG-1 (*GHG Reduction Offsets*) would require that future tenant(s) of the Maritime Support Facility and/or LAHD purchase and retire carbon offsets equivalent to Project GHG emissions that occur in excess of LAHD's annual threshold of 10,000 metric tons carbon dioxide equivalent ($MTCO_2e$). With mitigation, impacts from the generation of GHG emissions during construction and operations would be less than significant.

EIR Section 3.4, *Hazards and Hazardous Materials*, discusses the Project's potentially significant impacts from contaminated soil, groundwater, and soil vapor. MM HAZ-1 (*Characterize Soil, Soil Vapor, and Groundw ~~W~~ater Contamination*) would have requirements for soil and groundwater testing, handling, storage, transport, and disposal, and outlines procedures for vapor sampling and determining the need for a vapor intrusion mitigation system. With mitigation, impacts from contaminated soil, groundwater, and soil vapor would be less than significant.

b) Minimize potential traffic conflicts between vessels

The Project site is located on Terminal Island. Vessel trips would not be generated during construction or operation of the Terminal Island Maritime Support Facility Project. Construction equipment and materials would be transported via regional and local roadways. During Project operations, the new grade separation (not part of the Proposed Project) on the western end of the site would serve as the access point for the chassis support facility. As such, construction and operational activities would not result in traffic conflicts between vessels. The Proposed Project would be consistent with CCA Section 30708(b).

c) Give highest priority to the use of existing land space within harbors for port purposes, including, but not limited to, navigational facilities, shipping industries, and necessary support and access facilities.

The proposed chassis support facility would fall under the category of support facilities, as it would provide a storage yard for chassis and wheeled empty containers that would increase the efficiency of overall Port operations. Moreover, while the Project site was formerly used as an empty container storage yard as recently as 2023, it is currently vacant. Because the Proposed Project would utilize existing land space within the harbor for port purposes, it would be consistent with CCA Section 30708(c).

d) Provide for other beneficial uses consistent with the public trust, including, but not limited to, recreation and wildlife habitat uses, to the extent feasible.

The Project site is located in Planning Area 3 – Terminal Island. This planning area is the largest in the Port, consisting of approximately 1,940 acres and more than 9.5 miles of usable waterfront, and is primarily

focused on container operations. The Project site has been unoccupied and vacated since mid-2023 and has not been operated by any entity. The Proposed Project would increase the efficiency of container operations by providing a chassis and wheeled empty container storage yard. As required under CCA Section 30708(c), the highest priority is given to the use of existing land space for port purposes such as the Proposed Project, which would use the land for the shipping industry and support facilities. The Proposed Project would be consistent with CCA Section 30708(d).

e) Encourage rail service to port areas and multi-company use of facilities.

Rail service is not needed for the Proposed Project; all construction materials and site access during operations would be autos (cars, trucks). However, Project operations would involve the storage of chassis and wheeled empty containers by one or multiple tenants, which would satisfy the goal of multi-company use of facilities. The Proposed Project operations would not impact the rail operations surrounding the site, keeping intact the rail service tracks that facilitate cargo movement port-wide. Therefore, the Proposed Project would be consistent with CCA Section 30708(e).

Appealable Approvals

A Coastal Development Permit (CDP) is required for development within the coastal zone and would be subject to review and approval by the Board of Harbor Commissioners. Once a PMP has been certified, the port governing body has the authority to issue a CDP for any development found consistent with the certified PMP. The Board of Harbor Commissioners has the ability and the responsibility to amend the PMP as needed; however, any PMP amendment must be certified by the CCC (CCA Section 30716(a)).

Approval of any of the following categories of development may be appealed to the CCC.

Section 30715. Permit Authority; Appealable Approvals

Chapter 8, Section 30715(a) of the CCA states that the following categories of development may be appealable to the CCC:

(1) Developments for the storage, transmission, and processing of liquefied natural gas and crude oil in such quantities as would have a significant impact upon the oil and gas supply of the state or nation or both the state and nation.

The Proposed Project does not involve development for the storage, transmission, or processing of liquefied natural gas in any quantity. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(1).

(2) Waste water treatment facilities, except for those facilities which process waste water discharged incidental to normal port activities or by vessels.

The Proposed Project is not a waste water treatment facility. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(2).

(3) Roads or highways which are not principally for internal circulation within the port boundaries.

The Proposed Project does not involve the construction or modification of roads or highways which are not principally for internal circulation within port boundaries. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(3).

(4) Office and residential buildings not principally devoted to the administration of activities within the port; hotels, motels, and shopping facilities not principally devoted to the sale of commercial goods utilized for water-oriented purposes; commercial fishing facilities; and recreational small craft marina related facilities.

The Proposed Project does not involve the construction of office and residential buildings not principally devoted to the administration of activities within the Port; hotels, motels, and shopping facilities not principally devoted to the sale of commercial goods utilized for water-oriented purposes; commercial fishing facilities; or recreational small craft marina related facilities. The Proposed Project would modify the interior of approximately 2,900 square feet of office space that would be principally devoted to the administration of the chassis support facility. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(4).

(5) Oil refineries.

The Proposed Project would involve the construction and operation of a chassis support facility. The Proposed Project does not include the construction and operation of a new oil refinery. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(5).

(6) Petrochemical production plants.

The Proposed Project would involve the construction and operation of a chassis support facility. The Proposed Project does not include the construction and operation of a new petrochemical production plant. Therefore, the Proposed Project is not appealable under Coastal Act Section 30715(a)(6).

Section 30715.5. Finding of Conformity

Section 30715.5 states that:

> *No developments within the area covered by the certified port master plan shall be approved by the port governing body unless it finds that the proposed development conforms with such certified plan.*

Section 2.4.2, *Project Site and Surrounding Uses*, discusses the Proposed Project's conformity with the PMP, noting that the Proposed Project would require a PMP amendment to update the land use designation of Maritime Support (23.6 acres), Liquid Bulk (53.3 acres), and Container (12.3 acres) to a dual designation of Container and Maritime Support for the area within "the loop"~~(full 89.2 acres)~~. The Board of Harbor Commissioners must determine that the Proposed Project aligns with the PMP prior to Project approval. Current ~~L~~land uses of the Project site and surrounding parcels are shown in Figure 1. The revised PMP designations are shown in Figure 2.

Figure 1. ~~Zoning~~ PMP Land Use Designations ~~Near~~ at the Project Site

Note: Boundaries and associated acreages presented are approximate and based on a conceptual design only.

Figure 2. Proposed PMP Land Use Designations at the Project Site – NEW

Note: Boundaries and associated acreages presented are approximate and based on a conceptual design only.

REFERENCES

CAL FIRE. 2026. Fire Hazard Severity Zone Viewer. Accessed April 10, 2026. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9.

LAHD (Los Angeles Harbor Department). 2018a. Port Master Plan. September. Figure 10, Biological Resources. Accessed April 29, 2026. https://kentico.portoflosangeles.org/getmedia/adf788d8-74e3-4fc3-b774-c6090264f8b9/port-master-plan-updatewith-no-29_9-20-2018.

____. 2018b. Port of Los Angeles Sea Level Rise Adaptation Study. Final Draft. 10 September. Accessed April 29, 2026. https://kentico.portoflosangeles.org/getmedia/29acdb3a-c9a1-4e9c-a233-0a4e74438a3c/2018_Sea_Level_Rise_Adaptation_Study.

____. 2023a. Port of Los Angeles Terrestrial Biological Characterization Survey – LAXT Loop. Prepared by Rincon Consultants, Inc. April. Updated September 2023.

____. 2023b. Notice of Preparation/Initial Study for the Terminal Island Maritime Support Facility Project. Accessed April 1, 2026. https://kentico.portoflosangeles.org/getmedia/67c8f994-b90c-49b7-a41f-8344faf9de5e/Maritime-Support-Facility-NOP-IS.

Appendix D

Soil Management Plan

SOIL MANAGEMENT PLAN

Terminal Island Maritime Support Facility (TIMSF) & Grade Separation (TIGS)

Terminal Island, California

Project Information	
Client	City of Los Angeles Harbor Department
Division	Environmental Management Division (EMD)
Address	425 South Palos Verdes Street, San Pedro, CA 90731
Project Directive	#1
Agreement Number	25-10184
APP Number	221020-521 H

Document Information	
Prepared By	Pacific Edge Engineering, Inc.
Address	26431 Crown Valley Parkway, Suite 270, Mission Viejo, CA 92691
Principal Engineer	Craig A. Stolz, P.E.
Document Status	FINAL
Date	May 1, 2026

TABLE OF CONTENTS

1.0 Professional Certification 1
2.0 Introduction 2
2.1 Objectives 2
3.0 Site Background 3
3.1 Site Location and Description 3
3.2 Site History 3
3.3 Environmental Investigations 4
3.3.1 Phase II Site Investigation (SCS Engineers, 1991) 4
3.3.2 Phase I Assessment (Shaefer Dixon Associates, 1992) 4
3.3.3 Soil and Groundwater Investigation (Geofon, Inc., 1993) 4
3.3.4 Baseline Site Characterization (Shaefer Dixon Associates, 1993) 4
3.3.5 Soil Characterization Report (Tetra Tech, 1995) 4
3.3.6 Environmental Baseline Study – Surface Soils (Tetra Tech, 1998) 5
3.3.7 Site Characterization (The Source Group, Inc., 2005 and 2006) 5
3.3.8 Baseline Environmental Site Characterization (Locus, 2011) 5
3.3.9 Environmental Baseline Investigation (Pacific Edge, 2017) 5
3.3.10 Stockpile Assessments (Leighton Associates and Pacific Edge, 2022–2025) 5
3.3.11 Environmental Assessment (Pacific Edge, 2025) 5
3.3.12 Pre-Construction Waste Characterization Soil Sampling (Ninyo & Moore, 2026) 6
3.3.13 PFAS Sampling at TIMSF (Parsons, 2026) 6
3.3.14 PFAS Sampling at TIGS (Parsons, 2026) 6
3.3.15 Environmental Assessment Addendum (Pacific Edge, 2026) 6
3.4 Contaminants of Concern 7
3.5 Recommended Soil Disposal Classification 8
3.6 Non-Reuse Soil 8
4.0 Planned Construction Activities 10
4.1 Areas of Special Handling 10
5.0 Project Responsibilities and Training Requirements 11
5.1 Harbor Department 11
5.2 General Contractor 11
5.3 Training and Other Regulatory Requirements 11
5.4 Harbor Department Notifications 12
6.0 Health and Safety Plan 13
7.0 General Requirements 14

7.1 SMP Limitations 14
7.2 Site Control 14
7.3 Dust and Air Pollution Control 14
SCAQMD Rule 1466 – Particulate (PM10) Control 14
SCAQMD Rule 1166 – VOC-Contaminated Soil Control 15
7.4 Stormwater Control 16
7.5 Soil Stockpiling and Staging 16
7.6 Soil Sampling and Analysis 17
Sample Collection Procedure 17
Analytical Methods 18
STLC and TCLP Trigger Thresholds 18
7.7 Liquid Waste Sampling and Analysis 18
7.8 Decontamination Procedures 19
7.9 Vehicle Decontamination 19
7.10 Sampling Equipment Decontamination 19
8.0 Waste Management Requirements 21
8.1 Waste Classification 21
8.2 Waste Disposal 21
8.2.1 Soil Waste 22
8.2.2 Liquid Waste 22
8.2.3 Solid Waste 23
8.3 Waste Documentation 23
9.0 Other Pollution Prevention and Control Measures 24
9.1 Material and Equipment Staging Area 24
9.2 Truck Loading Procedures 24
9.3 Equipment Refueling and Maintenance 24
10.0 Backfill Material Requirements 26
11.0 References 27

FIGURES

Figure 1 Site Plan
Figure 2 Boring Locations of Known Non-Reuse Soil

TABLES

Table 1 TPH in Soil Summary
Table 2 Metals in Soil Summary
Table 3 Detected Organochlorine Pesticides in Soil Summary
Table 4 PCBs in Soil Summary
Table 5 Detected VOCs in Soil Summary

Table 6 Detected SVOCs in Soil Summary
Table 7 PAHs in Soil Summary
Table 8 PFAS in Soil Summary

APPENDICES

Appendix A 2026 Environmental Assessment Addendum, 2025 Environmental Assessment Report and 2017 Environmental Baseline Report (Pacific Edge)
Appendix B 2026 Pre-Construction Sampling Report for TIGS (Ninyo & Moore)
Appendix C 2026 PFAS Sampling Reports for TIMSF & TIGS (Parsons)
Appendix D SCAQMD Rules 1166, 1466, and 403
Appendix E Harbor Department Environmental Guidance for Industrial Fill Material – December 2021 and DTSC's Information Advisory: Clean Imported Fill – 2001
Appendix F PFAS Sampling Guidelines

1.0 Professional Certification

Pacific Edge Engineering, Inc., under the professional supervision of Craig A. Stolz, has prepared this Soil Management Plan (SMP), dated May 1, 2026 for the Terminal Island Maritime Support Facility (TIMSF) and Terminal Island Rail System Grade Separation (TIGS) located in Terminal Island, California. The findings, conclusions, specifications, and/or professional opinions presented in this report have been prepared in accordance with generally accepted professional engineering practice, and within the scope of the project. There is no other warranty, either expressed or implied.

Craig A. Stolz
P.E. No. C049756
Principal Engineer
Pacific Edge Engineering, Inc.

2.0 Introduction

This Soil Management Plan (SMP) has been prepared by Pacific Edge Engineering, Inc. (Pacific Edge) on behalf of the City of Los Angeles Harbor Department (Harbor Department) Environmental Management Division (EMD) for the Terminal Island Maritime Support Facility (TIMSF) and Terminal Island Rail System Grade Separation (TIGS), located at the former Los Angeles Exchange Terminal (LAXT) Loop in Terminal Island, California (the Site).

The TIMSF portion of the Site (LAXT Loop) will be redeveloped into a container storage and transfer support facility. The proposed redevelopment plan includes construction of a maintenance building, roadability building, office building, stand-alone restroom buildings, underground utilities, guard shacks, and stormwater infrastructure. Redevelopment will include, but is not limited to, soil excavation, stockpiling, sampling, and characterization for on-site reuse or off-site disposal, and management of groundwater that may be encountered during construction. The TIGS portion of the Site will be redeveloped to reconfigure the existing at-grade railroad tracks crossing.

2.1 Objectives

This SMP establishes the procedures, requirements, and responsibilities necessary to manage soils and generated wastes in a manner protective of human health and the environment throughout the TIMSF and TIGS redevelopment. Specifically, the SMP is designed to:

- Protect human health and the environment through proper management of soils encountered during construction.
- Identify known contamination based on previous investigations and Harbor Department records.
- Establish procedures for excavation, handling, and segregation of soil to prevent cross-contamination between clean and impacted materials.
- Define protocols for on-site stockpiling, covering, labeling, and sampling of soils.
- Determine appropriate disposition of excavated soil, including on-site reuse or disposal at a permitted, Harbor Department-approved facility.
- Ensure all waste generated during construction is properly documented and disposed of in compliance with applicable regulations.
- Prevent migration of impacted soil or contaminants through implementation of dust control, stormwater best management practices (BMPs), erosion control, and spill prevention measures consistent with Port requirements.
- Protect workers and the public by ensuring compliance with applicable Cal/OSHA requirements, including appropriate personal protective equipment (PPE) and health and safety procedures.

3.0 Site Background

3.1 Site Location and Description

The Site is located on Terminal Island, California, within the Port of Los Angeles. Terminal Island consists of land created through hydraulic fill placement and/or imported soil materials. The Site is approximately 88 acres in size, loop-shaped, and is bounded by railroad tracks along its perimeter. The Site Plan is presented on **Figure 1**.

The Site is currently unoccupied, with two portable aboveground guard shacks located near the former truck queuing stations in the southwest portion of the property. The southern approximately half of the Site is surfaced with crushed miscellaneous base (CMB) material.

Four soil stockpiles are present at the north end of the Site:

Stockpile	Estimated Volume / Source
North Stockpile	~110,641 cy – various unknown Port sources
Pier 400 Stockpile	~9,436 cy – Pier 400 (assigned to another Port property; will not be used at the Site)
SR47 Stockpile	~2,696 cy – Pier 400
West Harbor Development Stockpile	~7,500 cy – West Harbor (previously known as Port's O'Call redevelopment project)

3.2 Site History

The Site has undergone numerous changes in industrial land use since its initial development. Key historical phases are summarized below:

Period	Land Use / Activity
1928	Allen Field – California's first combined land-and-sea airport; single oil-surfaced runway, pier, and seaplane runway.
1935	U.S. Navy assumed the Site (Reeves Field – 30-year lease). Improvements included new runways, hangars, support buildings, seaplane lagoon and ramp, underground storage tanks (USTs), and aviation fuel pipelines.
1947	Aviation fuel pipelines deactivated and abandoned in place.
1970s	Portions leased to LAPD (training) and City of Los Angeles (sewage-sludge drying).
1977–1980	Reeves Field and all supporting structures demolished and removed. All USTs removed except one 85-gallon fuel oil tank (T-16) in the former runway area.
Mid-1980s – Early 1990s	Extensive fill importation; paved automobile storage lots constructed in northern and central portions. Southern portion leased for petroleum coke storage; western portion for container refurbishing.

Period	Land Use / Activity
1993–1995	Northern area used as vehicle handling facility; southwestern corner used for petroleum coke storage and Harbor Department dredge material storage. In 1995, ~330,000 cy of imported fill was stored for the Seaside Avenue/Navy Way Grade Separation project.
1994–1997	LAXT Dry Bulk Handling Facility constructed and commissioned; operations included coal and petroleum coke storage, blending, and ship loading via conveyor to the Near Berth Storage Area.
2008–2010	LAXT operations scaled back and fully demolished.
2010–2025	Site remained as unoccupied dirt lot, periodically used for container trailer staging; two portable guard shacks remain.

3.3 Environmental Investigations

A series of environmental investigations have been conducted at the Site to screen soil, soil vapor, and groundwater conditions. Investigations are summarized chronologically below.

3.3.1 Phase II Site Investigation (SCS Engineers, 1991)

Soil and groundwater samples collected along the Terminal Way expansion project corridor detected total petroleum hydrocarbons (TPH) at concentrations up to 6,660 mg/kg, attributed to petroleum coke. Low toluene concentrations were identified in soil and groundwater; trichloroethene (TCE) was detected in one groundwater monitoring well.

3.3.2 Phase I Assessment (Shaefer Dixon Associates, 1992)

Potential on-site contamination sources were identified, including dredged fill, abandoned fuel pipelines, historic USTs, former Reeves Field buildings, and a former container refurbishing area. Although USTs were removed during prior demolition activities, one fuel oil tank may have remained in place.

3.3.3 Soil and Groundwater Investigation (Geofon, Inc., 1993)

Sampling at the former Railway Car Dump area in the northeast portion of the Site detected TPH up to 100 mg/kg, trace volatile organic compounds (VOCs), and organochlorine pesticides; metals were within background levels. Groundwater contained mercury and selenium at concentrations slightly above NPDES discharge requirements.

3.3.4 Baseline Site Characterization (Shaefer Dixon Associates, 1993)

Sampling of fill and hydraulic soils detected TPH up to 16,000 mg/kg in stained surface soils at the Container Refurbishing Area; concentrations were generally low elsewhere across the Site. Groundwater did not exhibit obvious contaminant plumes, and metals were within regulatory thresholds.

3.3.5 Soil Characterization Report (Tetra Tech, 1995)

Testing of approximately 330,000 cy of imported fill soil found no compounds of concern. The soil was approved for use in construction.

3.3.6 Environmental Baseline Study – Surface Soils (Tetra Tech, 1998)

Surficial soil samples contained low TPH concentrations (165–527 mg/kg), polycyclic aromatic hydrocarbons (PAHs) associated with petroleum coke, and one low-level polychlorinated biphenyls (PCBs) detection. Metals were consistent with regional background concentrations; overall risk was considered low.

3.3.7 Site Characterization (The Source Group, Inc., 2005 and 2006)

Soil samples collected during LAXT operations detected TPH up to 1,300 mg/kg; PAHs were present in approximately 15% of samples, with some carcinogenic PAHs exceeding EPA industrial Preliminary Remedial Goals (PRGs). Metals were within background levels.

3.3.8 Baseline Environmental Site Characterization (Locus, 2011)

Post-demolition sampling detected TPH up to 8,700 mg/kg, trace VOCs, and low-level pesticides; metals were within background. No significant PAHs, PCBs, or semi-volatile organic compounds (SVOCs) were detected. Groundwater results indicated only limited low-level VOCs and TPH.

3.3.9 Environmental Baseline Investigation (Pacific Edge, 2017)

Soil, groundwater, and vapor samples detected TPH, metals, and occasional VOCs; few results exceeded industrial screening values and overall health risk was considered low. A 2024 data review indicated that additional soil gas testing may be warranted for future buildings in light of updated DTSC guidance. A 2025 review confirmed that all detected contaminant concentrations in soil were below state and federal hazardous waste threshold values.

3.3.10 Stockpile Assessments (Leighton Associates and Pacific Edge, 2022–2025)

Stockpiles currently present at the Site (**Section 3.1**) were sampled and determined to be suitable for reuse at the Site. The Pier 400 Stockpile (~9,436 cy) has been assigned to another Port property and will not be incorporated into the TIMSF redevelopment.

3.3.11 Environmental Assessment (Pacific Edge, 2025)

The 2025 Environmental Assessment was conducted to identify potential waste categories for upcoming TIMSF construction and to evaluate whether chemical concentrations in soil could pose a health risk for the intended/planned industrial site use. The assessment focused on in-place stored fill (~73,000 cy), CMB material, proposed storm drain filtration areas, and proposed building locations. A total of 84 soil borings were advanced, 195 soil samples were collected, 17 soil vapor probes were installed and sampled beneath proposed building locations, and 5 grab-groundwater samples were collected from proposed storm drain filtration areas.

Key findings include:

- Diesel Range Organics (DRO) in soil and CMB exceeded the San Francisco Bay RWQCB Environmental Screening Level (ESL) for a construction worker in 11 samples.
- Soluble lead exceeded the California hazardous waste threshold in one soil sample.
- DRO and nickel exceeded the ESL for direct exposure in one grab-groundwater sample.

- Benzene and/or Gasoline Range Organics (GRO) in soil vapor exceeded the commercial/industrial screening level (using DTSC-recommended attenuation factor of 0.03) at the planned maintenance building, office building, and a restroom building.

3.3.12 Pre-Construction Waste Characterization Soil Sampling (Ninyo & Moore, 2026)

This assessment was conducted within the proposed TIGS project area, which is part of the TIMSF redevelopment plan, and the purpose was to identify potential waste classifications.

A total of 11 borings were advanced and 34 soil samples were collected. Ninyo & Moore concluded that soil excavated within the TIGS area should be classified as non-hazardous.

3.3.13 PFAS Sampling at TIMSF (Parsons, 2026)

In January 2026, Parsons completed a screening for per- and polyfluoroalkyl substance (PFAS) in soil and groundwater within the proposed TIMSF project area. Parsons' investigation comprised 14 borings and 42 soil samples collected at discrete depth intervals within the identified areas of potential PFAS release. All Parsons borings were located immediately adjacent to Pacific Edge 2025 environmental assessment borings and assigned the same boring identification numbers.

PFAS were detected in most samples. PFAS detections in soil were limited to perfluorohexanesulfonic acid (PFHxS), perfluorooctanesulfonic acid (PFOS), perfluorohexanoic acid (PFHxA) and perfluorooctanoic acid (PFOA). Of the detected compounds, only PFOA was reported at concentrations exceeding the USEPA Regional Screening Level (RSL) for Industrial Soil of 0.078 µg/kg.

One groundwater sample was collected from a temporary well installed at boring FB13 contained multiple PFAS compounds exceeding applicable SFRWQCB Environmental Screening Levels (ESLs), including PFDA, PFHxS, PFNA, PFOS, and PFOA.

3.3.14 PFAS Sampling at TIGS (Parsons, 2026)

In January 2026, Parsons completed PFAS soil sampling within the proposed TIGS project area. Parsons' investigation comprised three borings and 12 samples collected at discrete depth intervals. All Parsons borings were located immediately adjacent to Ninyo & Moore pre-construction waste characterization borings and assigned the same boring identification numbers.

PFAS were detected in most samples. PFAS detections were limited to perfluorooctanesulfonic acid (PFOS), perfluorohexanesulfonic acid (PFHxS), perfluorohexanoic acid (PFHxA), perfluorooctanoic acid (PFOA), perfluoropentanoic acid (PFPeA), and perfluoropentanesulfonic acid (PFPeS).

Of the compounds detected, only PFOA was reported at concentrations exceeding the applicable USEPA Regional Screening Level (RSL) for Industrial Soil (0.078 µg/kg). No other PFAS analytes exceeded applicable screening criteria in the soil samples evaluated.

3.3.15 Environmental Assessment Addendum (Pacific Edge, 2026)

Pacific Edge prepared an addendum to the 2025 Environmental Assessment Report. The purpose of this addendum was to supplement Pacific Edge's previous assessment at the TIMSF with recently completed PFAS soil and groundwater sampling data collected by Parsons.

3.4 Contaminants of Concern

Contaminants of Concern (COCs) have been identified based on the following primary assessment documents:

- Pacific Edge's 2025 Environmental Assessment and Addendum, and 2017 Environmental Baseline Report (**Appendix A**)
- Ninyo & Moore's 2026 Pre-Construction Soil Sampling Report (**Appendix B**)
- Parsons' 2026 PFAS Sampling at TIMSF (**Appendix C**)
- Parsons' 2026 PFAS Sampling at TIGS (**Appendix C**)

These reports represent current Site conditions. Other historical environmental reports referenced herein are available through the Harbor Department's Environmental Management Division (EMD). COCs are defined as constituents that exceed a regulatory commercial/industrial screening level, a hazardous waste threshold, or the Harbor Department's Environmental Guidance For Industrial Fill Material criteria in any of the above assessments.

Medium	COC Category	Specific Constituents
Soil / CMB	TPH	DRO and Total TPH (C6–C44)
	VOCs	Benzene, chloroform, TCE, toluene
	Title 22 Metals	Arsenic, barium, chromium, copper, lead, molybdenum, selenium
	Organochlorine Pesticides	Aldrin, chlordane, dieldrin, DDD, DDE, DDT
	PCBs	Aroclor-1248, Aroclor-1254, Aroclor-1260
	SVOCs	Polycyclic aromatic hydrocarbons (PAHs)
	PFAS	Perfluorooctanesulfonic acid (PFOS), Perfluorohexanesulfonic acid (PFHxS), Perfluorohexanoic acid (PFHxA), Perfluorooctanoic acid (PFOA), Perfluoropentanoic acid (PFPeA), and Perfluoropentanesulfonic acid (PFPeS)
Groundwater	TPH	DRO
	Title 22 Metals	Nickel
	PFAS	PFOS, PFHxS, PFOA, Perfluorodecanoic acid (PFDA), and Perfluorononanoic acid (PFNA)
Soil Vapor	TPH	GRO
	VOCs	Benzene, ethylbenzene, xylenes, 1,2,4-TMB, cis-1,2-DCE, dichlorodifluoromethane, isopropylbenzene, p-isopropyltoluene, sec-butylbenzene, PCE, toluene, 1,1,1-TCA, TCE

3.5 Recommended Soil Disposal Classification

Tables 1 through 8 summarize all soil analytical data within TIMSF and TIGS areas. On these tables, soil data is compared to applicable hazardous waste thresholds, regulatory screening levels, and the Harbor Department's industrial fill guidance. Data from the screenings generally indicate that soils taken off-site would be classified as non-hazardous, with the exception of soil at and in the vicinity of boring FB22, which is classified as California Non-RCRA Hazardous due to soluble lead concentrations exceeding the STLC threshold. However, as described in **Section 3.6**, waste characterization sampling is required prior to disposal.

Tables 1 through 8 use the following color classification system:

Map Color	Classification	Description
Black	CA Non-RCRA Hazardous	Soil at/near boring FB22 only – exceeds soluble lead hazardous waste threshold (STLC)
Red	Non-Hazardous – Exceeds Industrial Screening	Exceeds regulatory commercial/industrial screening level
Orange	Non-Hazardous – Exceeds Residential Screening	Exceeds residential screening level but ≤ industrial screening level
Yellow	Non-Hazardous – Exceeds HD industrial guidance	Exceeds Harbor Department industrial guidance but ≤ residential screening level
Green	Non-Hazardous – Meets All Criteria	Below Harbor Department industrial guidance criteria and all regulatory screening levels; suitable for on-site reuse

3.6 Non-Reuse Soil

On **Figure 2**, borings locations are color-coded per the classification system above. Soil exceeding a hazardous waste threshold or a regulatory industrial screening level must not be reused at TIMSF and TIGS (or at any other Port property) and must be properly disposed.

Based on current analytical data, soil at boring FB22 (at any depth) must be classified as California non-RCRA Hazardous Waste if excavated and must be disposed of at a Port-approved hazardous waste landfill. The minimum areal extent of California non-RCRA Hazardous Waste, shown on Figure 2, is approximately 2,995 ft^2.

Soils exceeding an industrial screening level (non-reuse soils) are denoted on **Figure 2** by red borings. The extent of non-reuse soils requiring off-site disposal are also highlighted in dark blue on **Figure 2** and cannot be reused on-site and must be properly disposed at a Port-approved landfill. Based on current analytical data, these soils would be classified as non-hazardous.

Based on current analytical data, the in-place CMB exceeds industrial screening criteria for one or more contaminants but does not exceed hazardous waste thresholds. EMD has determined that in-place CMB (extent shown on **Figure 2**) may be reused on-site only if it is placed as base material beneath asphalt or concrete pavement. In-place CMB that is excavated but not placed beneath asphalt

or concrete must be disposed of at a Port-approved non-hazardous waste landfill and cannot be reused as fill on-site or other sites at the Port.

Soils beyond the depths listed below have not been sampled; their hazardous/non-hazardous classification and suitability for on-site reuse are therefore undetermined. Excavated soil from beyond these depths must be stockpiled (**see Section 7.5**) and sampled (**see Section 7.6**) to establish classification and reuse eligibility.

- Storm drain filtration areas: soil deeper than 9 feet below existing surface elevation
- Proposed building locations: soil deeper than 12 feet below existing surface elevation
- In-place stored fill areas: soil deeper than 4 feet below existing surface elevation
- In-place CMB: soil beneath the existing surface elevation of the CMB

4.0 Planned Construction Activities

The TIMSF portion of the Site will be redeveloped into a container storage and transfer support facility. The proposed construction program includes a maintenance building, roadability building, office building, stand-alone restroom buildings, guard shacks, underground utilities, and stormwater infrastructure. The TIGS portion of the Site will be redeveloped with a bridge and retaining wall so that access to the TIMSF area is more effective and efficient.

Construction will involve, but is not limited to, soil excavation, stockpiling, sampling, characterization for on-site reuse or off-site disposal, and management of groundwater encountered during excavation.

All soil disturbed during construction must be managed in accordance with this SMP, regardless of apparent condition or location within the Site boundary.

4.1 Areas of Special Handling

Certain areas of the Site have been identified where elevated COC concentrations require special soil handling procedures if the soils are disturbed. Special handling areas are those where COCs exceed current commercial/industrial screening levels and/or hazardous waste criteria. The locations and approximate coordinates of these areas are shown on **Figure 2** and described in **Section 3.6**.

⚠ Special Handling Requirements – Key Rule
Excavations in these areas must be backfilled with material meeting regulatory criteria and the prior approval of the Harbor Department.
If these areas are NOT disturbed during construction, special handling is not required; however, residual contamination must be covered with asphalt and/or concrete to mitigate future exposure risk.

5.0 Project Responsibilities and Training Requirements

The following defines key roles and responsibilities for implementation of this SMP throughout the TIMSF and TIGS redevelopment.

5.1 Harbor Department

The Harbor Department's Construction Division (Construction Division) is responsible for selecting the General Contractor (GC) for the redevelopment project. The Construction Division will verify that the GC is adequately trained and qualified to implement the requirements of this SMP and will monitor GC performance to ensure full compliance with all applicable SMP procedures.

5.2 General Contractor

The GC and/or their authorized representative shall implement this SMP and ensure proper handling and management of the following activities:

- Stockpiling of excavated soil.
- Waste segregation and stockpile testing for disposal or potential on-site reuse.
- Documentation and labeling of waste drums and containers, including pre-transport requirements (packing, marking, labeling, storing, and placarding of hazardous wastes prior to shipment).
- Tracking and maintaining waste inventory.
- Procurement and completion of waste profiles and manifests, including required signatures, use of a qualified transporter, and maintenance of disposal records (weight tickets, bills of lading, waste manifests).
- Preparation of a site-specific Health and Safety Plan (HASP).
- Preparation and submission of all documents required for SMP compliance per the redevelopment specifications, and procurement of all necessary permits prior to initiating field activities.

5.3 Training and Other Regulatory Requirements

All field personnel performing soil disturbance activities at the Site must complete OSHA Hazard Communication training per 29 CFR 1910.1200. This training shall be kept current as environmental concerns arise during tailgate safety meetings or as otherwise required. Additionally, all construction personnel must complete a Hazardous Waste Operations and Emergency Response (HAZWOPER) training course—either 24-hour or 40-hour, depending on assigned responsibilities—and an annual 8-hour refresher course, in accordance with 29 CFR 1910.120 and California Code of Regulations (CCR) Title 8, § 5192.

All personnel on-site shall, at a minimum, comply with the health and safety requirements established in the site-specific HASP (**Section 6.0**) and follow all instructions of the designated Site Health and Safety Officer (SHSO). Equipment operators shall be trained to minimize both job hazards and environmental impacts during equipment operation.

Contractors handling or testing waste materials must hold all required qualifications, licenses, registrations, and permits applicable to their scope of work. Required credentials may include, but are not limited to:

- California Professional Engineering or Geologist license
- California contractor and/or hazardous waste remediation contractor license (for excavation and handling of hazardous waste)
- California Department of Transportation (DOT) registration for hazardous waste transportation
- SCAQMD Rule 1166 and 1466 permits (**Appendix D**)

Soil excavated within the Site boundary may be reused on-site depending upon analytical testing, regulatory screening criteria, and as approved by the Harbor Department. Otherwise, soil must be disposed of at a Harbor Department-approved licensed disposal facility. Groundwater removed from the ground must be either disposed of at an approved licensed facility, discharged under an approved NPDES permit, or discharged to an industrial sewer with a permit obtained from the Los Angeles City Sanitation Department.

All sampling, analysis, and handling procedures in this SMP shall be implemented to assess the potential for on-site reuse and to characterize waste for off-site disposal. All work must comply with the Mitigation Monitoring and Reporting Program (MMRP) included in the Environmental Impact Report (EIR).

5.4 Harbor Department Notifications

If unexpected environmental conditions not described in this SMP are encountered during construction, the GC shall notify the Port Inspector, who will in turn notify the Harbor Department's EMD within 24 hours of discovery.

6.0 Health and Safety Plan

A site-specific Health and Safety Plan (HASP) shall be prepared by the GC and reviewed by all field staff prior to beginning any work at the Site. The HASP shall establish the minimum health and safety requirements for safe conduct of work at the Site based on known contamination and site conditions. The HASP shall incorporate the requirements of Cal-OSHA Hazardous Waste Operations Standards (29 CFR, Section 1910.120) and California Code of Regulations (Title 8 CCR, Section 5192). The HASP shall be approved by a Certified Industrial Hygienist (CIH) prior to the start of work.

At a minimum, the HASP shall demonstrate an understanding of risks and address the appropriate level of PPE for on-site workers during all construction activities. The HASP shall describe the conditions, events, action levels, or encounters that may require an upgrade in PPE level. At a minimum, Level D PPE is required for all construction work, including:

- Steel-toed boots
- Hard hat
- Safety goggles
- Hearing protection
- Work gloves

The HASP shall include a description of COCs, conditions, events, and action levels that would trigger an upgrade to Level C or higher PPE.

The GC shall hold tailgate safety meetings at the beginning of each workday, when new personnel arrive on-site, and whenever new conditions or hazards arise. Meeting notes and sign-in sheets shall be maintained on-site by the GC for the duration of the project and made available to the Harbor Department upon request.

7.0 General Requirements

Chemically impacted soil (CIS) will likely be encountered in subsurface soils and, potentially, in groundwater at the Site during construction activities. This section establishes requirements for the sampling, handling, and management of all soils and groundwater removed from the Site.

7.1 SMP Limitations

The requirements and procedures in this SMP apply only within the defined Site boundaries, as shown on **Figures 1 and 2**. Areas outside the Site boundary are not subject to this SMP's provisions.

7.2 Site Control

The Site shall be secured to prevent access by unauthorized personnel through the use of existing perimeter fencing and gates. All gates shall remain closed and locked during non-working hours. Within the fenced area, additional temporary controls—such as fencing, delineators, cones, caution tape, or equivalent measures—shall be used to clearly designate and isolate active excavation areas and soil stockpiles.

7.3 Dust and Air Pollution Control

Given the COCs identified at the Site (**Section 3.4**), the GC must minimize off-site fugitive dust emissions during all excavation, loading, stockpiling, transport, grading, and compaction activities within the Site boundary. Dust control measures shall comply with SCAQMD Rule 1466 (**Appendix D**).

SCAQMD Rule 1466 – Particulate (PM10) Control

Rule 1466 governs the handling and management of contaminated soil to minimize PM10 emissions. Key requirements include:

- Submit notification to SCAQMD at least 72 hours before initiating earth-moving activities; notification must include site location and map, GC contact information, type and duration of activity, list of COCs with supporting data, and the air monitoring plan.
- Post Rule 1466-compliant warning signs at all Site perimeter access points, including GC contact information and SCAQMD phone number.
- Establish real-time PM10 perimeter air monitoring using calibrated monitors equipped with data logging and alarm capability.
- Install wind screens or barriers where necessary to reduce off-site dust migration.
- Establish track-out control devices at all vehicle access points; conduct daily cleanup of track-out areas and devices.
- Wet all soil before and during excavation, loading, stockpiling, transport, and grading operations.
- Minimize drop heights during soil loading and stockpiling.
- Cover stockpiles with tarps or plastic sheeting, or stabilize with water, within 3 hours of creation or before the end of each workday.

- Cover trucks leaving the Site with tarps; clean tires of all loose soil before departure.
- Maintain PM10 below 25 µg/m³ (one-hour average). If the PM10 threshold is exceeded, cease all dust-generating activities immediately, apply Rule 1466 dust controls, and resume earth-moving only after PM10 returns to below the threshold.
- Cease earth-moving activities if sustained wind speeds exceed 15 mph over any 15-minute period, or if instantaneous wind speeds exceed 25 mph.
- Retain records for at least 3 years including: air monitoring data and maintenance logs; dust control records (water truck logs, visual inspection records); personnel training records; agency notifications and correspondence; and analytical data documenting contaminant concentrations.
- Make all records available to SCAQMD upon request.

SCAQMD Rule 1166 – VOC-Contaminated Soil Control

Rule 1166 regulates activities that disturb VOC-contaminated soil to minimize atmospheric emissions. Compliance is required whenever excavating, handling, stockpiling, or transporting soil containing VOCs at concentrations above regulatory action levels. Rule 1166 applies when soil VOC vapor concentrations are ≥ 50 ppmv as measured by a calibrated photoionization detector (PID) or organic vapor analyzer (OVA) at the soil surface.

Because VOCs have been identified at the Site (**Section 3.4**), the GC shall obtain either a various-location or site-specific Rule 1166 permit prior to commencing soil-disturbing activities. Key provisions of a various-location Rule 1166 permit include, but are not limited to:

- Notify SCAQMD at least 24 hours before commencing excavation or grading.
- Conduct continuous or intermittent real-time air monitoring 3 inches above the soil surface using a calibrated PID or OVA during all soil-disturbing activities.
- Maintain monitoring records on-site in a format approved by SCAQMD.
- Notify SCAQMD within 24 hours of detection of soil VOCs ≥ 50 ppmv.
- VOC readings ≥ 50 ppmv but < 1,000 ppmv: Spray soil/work area with water and/or SCAQMD-approved vapor suppressant; cover stockpiles with plastic sheeting that overlaps a minimum of 24 inches and is secured so that no soil is exposed to the atmosphere.
- VOC readings ≥ 1,000 ppmv: Notify SCAQMD within 1 hour; immediately place affected soil into SCAQMD-approved sealed containers or load directly into trucks; apply additional water or vapor suppressant; cover and transport off-site immediately to an approved facility.
- Individual stockpiles shall not exceed 400 cy; total VOC-contaminated stockpile volume on Site shall not exceed 2,000 cy. If more than 2,000 cy is anticipated, a site-specific Rule 1166 permit is required.
- Conduct daily inspections and maintain records for all covered stockpiles until soil is removed from the Site.
- Remove all Rule 1166-regulated stockpile soil from the Site within 30 days of excavation.
- Cover/tarp all truck loads before leaving the Site.

- Include the notation “SCAQMD Rule 1166 – VOC Contaminated Soil” on all disposal manifests.
- Retain all Rule 1166 monitoring and disposal records for 2 years; make available to SCAQMD upon request.

7.4 Stormwater Control

Stormwater management measures shall be implemented throughout all soil-disturbing activities to minimize the potential for runoff to mobilize sediment, impacted soil, or other pollutants from the Site. The GC is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) prior to the start of work.

The SWPPP shall be prepared by a California-certified Qualified SWPPP Developer (QSD); SWPPP monitoring shall be performed by a California-certified Qualified SWPPP Practitioner (QSP). The SWPPP shall comply with the Construction General Permit (CGP) – NPDES No. CAS000002 and applicable City of Los Angeles BMP standards.

Prior to construction, the GC's QSD shall submit a SWPPP Notice of Intent (NOI) through the California Water Boards' SMARTS system (https://smarts.waterboards.ca.gov/). Upon project completion, the GC's QSP shall file a Notice of Termination (NOT) through SMARTS.

The GC shall implement and maintain all stormwater controls throughout the duration of construction. Stormwater BMPs shall be integrated into all soil management and stockpile management activities as described in this SMP and required by the project SWPPP.

7.5 Soil Stockpiling and Staging

Excavated soil shall be temporarily stockpiled or placed into an appropriate container—such as a lined waste roll-off bin or a DOT/UN-approved 55-gallon drum—in a designated staging area adjacent to the excavation (where feasible) or within another controlled area of the Site. All wastes shall be sampled and analyzed in accordance with this SMP and waste-profiling requirements established by the receiving facility, as well as applicable local, state, and federal regulations.

The following controls shall be implemented for all soil stockpiling and staging:

- Wet soil prior to excavation, transportation, and stockpiling to minimize dust generation.
- Do not place stockpiles in or near storm drain inlets, drainage channels, or areas subject to high stormwater flow.
- Protect stockpiles from stormwater run-on using a temporary perimeter sediment barrier (e.g., berms, dikes, silt fences, or sand/gravel bags).
- Place stockpiles on relatively impermeable material (e.g., tarp or heavy plastic sheeting).
- Cover stockpiles with relatively impermeable material (tarp or plastic sheeting) at the end of each workday, prior to any forecasted storm or wind event, and whenever stockpiles are not actively being worked. Secure covers with sandbags or equivalent weights.
- Seal waste containers with a secured lid when not actively being filled to minimize dust emissions.

- Remove stockpiled or containerized soil from the Site in a timely manner following completion of chemical profiling. Soil classified as hazardous waste shall be removed within 90 days of accumulation and managed in compliance with hazardous waste storage regulations.
- GC is to coordinate with the Harbor Department to obtain a site-specific EPA Identification Number for disposal of any hazardous waste generated at the Site.

7.6 Soil Sampling and Analysis

All excavated soil must be sampled to formally characterize it for disposal or to determine whether it is eligible for on-site reuse. Sampling shall be conducted by a qualified environmentally competent sampler who understands PFAS sampling procedures and has sufficient experience in soil sampling techniques to ensure collection of representative samples, proper sample preservation, equipment decontamination, and accurate chain-of-custody documentation.

Sampling of stockpiled or containerized soil (CIS and non-CIS) shall be conducted in accordance with the Harbor Departments' industrial guidance (December 2021, **Appendix E**), using the most current version available at the time of work. The minimum required sample frequency is based on estimated stockpile volume as shown below.

Estimated Volume	Minimum Samples	Sampling Rate
≤ 1,000 cy	1 per 250 cy	1 sample / 250 cy
1,001 – 5,000 cy	4 (first 1,000 cy), then +1 per 500 cy	Variable
> 5,000 cy	12 (first 5,000 cy), then +1 per 1,000 cy	Variable

Sample Collection Procedure

All samples must be representative of the full stockpile volume. Sample locations must include areas with visual or olfactory indicators of contamination (e.g., discoloration, staining, odors). Where no indicators are present, samples shall be randomly distributed to represent both horizontal and vertical distributions. Vertical sampling may require a hand auger, backhoe, or excavator.

Each sample shall consist of a composite of four sub-samples collected from different areas of the same sub-stockpile:

- Divide the stockpile into four quadrants of approximately equal size.
- Collect one discrete sub-sample from each quadrant at a different depth.
- For non-VOC analytes: submit sub-samples to the laboratory for composite analysis per sub-stockpile; archive remaining sub-samples in the event additional analysis is required.
- For VOCs: compositing is not permitted. Measure field VOC concentrations in each sub-sample using a PID; submit a Terracore® or Encore® sample collected from the sub-sample with the highest PID reading.

Label each sub-sample with the project name, sample ID, date, and time of collection. Record all sample information on a chain-of-custody (COC) form. Place samples on ice immediately after collection; maintain samples at 4°C ± 2°C in a thermally insulated cooler during handling and transport.

Sampling procedures involving PFAS must be conducted in accordance with the California State Water Quality Control Board guidelines to prevent cross-contamination (see **Appendix F**).

Analytical Methods

All samples shall be analyzed by a laboratory accredited by the California State Water Resources Control Board Environmental Laboratory Accreditation Program (ELAP). Required analytical methods are listed below.

Analyte Group	EPA Method
TPH as DRO, GRO, and Oil Range Organics (ORO)	EPA Method 8015M
VOCs	EPA Method 8260B / 5035 prep
Title 22 Metals	EPA Method 6010B / 7471A
Organochlorine Pesticides	EPA Method 8081A
PCBs	EPA Method 8082
SVOCs	EPA Method 8270C SIM
PFAS	EPA Method 1633

STLC and TCLP Trigger Thresholds

Additional leachate testing shall be triggered based on total constituent concentrations as follows:

Test	When Required	Trigger Level
STLC	Total concentration ≥ 10× STLC regulatory limit	≥ 10× STLC limit
TCLP	Total concentration ≥ 20× TCLP limit, OR STLC result exceeds threshold	≥ 20× TCLP limit or STLC > threshold

Additional analyses may be required if excavated soil exhibits odors, discoloration, or other indications of contamination not consistent with characteristic waste. If workers observe evidence of contamination beyond what has been previously identified, the Harbor Department shall be notified immediately.

7.7 Liquid Waste Sampling and Analysis

All liquid waste streams—including equipment decontamination water, stormwater, and groundwater—shall be sampled and characterized for either on-site discharge or off-site disposal. Liquid waste samples shall be analyzed by an ELAP-accredited laboratory.

If the GC intends to discharge liquid wastes on-site, the discharge must comply with an applicable approved NPDES permit or an Industrial Sewer Discharge permit from the Los Angeles City Sanitation Department.

All samples shall be analyzed by a laboratory accredited by an Environmental Laboratory Accreditation Program (ELAP) under the California State Water Resources Control Board. For off-site liquid waste

disposal (i.e., where an NPDES permit is not used), each waste stream shall be sampled separately using appropriately preserved, laboratory-supplied containers and analyzed at minimum for:

- TPH (C6–C44) by EPA Method 8015M
- Title 22 Metals by EPA Methods 6010B/7471A
- VOCs by EPA Method 8260B
- SVOCs by EPA Method 8270C SIM
- PFAS by EPA Method 1633 (in accordance with California Water Board Guidelines provided in Appendix F)

Trip blanks provided by the laboratory shall be analyzed with all VOC sample submissions. Sample preparation and analysis shall be completed within required method holding times.

7.8 Decontamination Procedures

Decontamination procedures shall be implemented for all sampling equipment and vehicles to prevent cross-contamination between waste streams and to prevent track-out of contamination from the Site. All decontamination activities shall be performed on plastic sheeting (visqueen) or within secondary containment sufficient to fully contain CIS and decontamination wastewater.

CIS collected during decontamination shall be placed into containers or stockpiled for proper disposal. Decontamination wastewater shall be accumulated in DOT-approved 55-gallon drums or temporary storage tanks (e.g., Baker tanks). All decontamination wastes shall be sampled and disposed of per **Sections 7.6, 7.7,** and **8.2**.

7.9 Vehicle Decontamination

All vehicles—including heavy equipment and trucks—entering areas of potential contamination shall be decontaminated before leaving the Site. Vehicle decontamination shall consist of wheel shakers to remove gross soil particles, followed by brushing of tires and wheel wells. If brushing is insufficient, the GC shall employ a pressure washer to thoroughly clean tires and undercarriages.

Where wash fluids are used, all cleaning shall occur within a visqueen-lined decontamination pad to fully contain wash water. To minimize decontamination fluid generation, personal vehicles shall not be driven or parked in areas of potential contamination where feasible.

7.10 Sampling Equipment Decontamination

All reusable sampling equipment—including hand augers, shovels, trowels, and similar tools—shall be decontaminated prior to initial use and between each sampling location to prevent cross-contamination. Decontamination shall follow the three-stage process described below.

Stage	Procedure
Stage 1 – Wash	Scrub equipment thoroughly in a solution of Liquinox and tap water until visibly free of soil and residue.
Stage 2 – Tap Water Rinse	Rinse equipment in clean tap water to remove residual detergent and debris.

Stage 3 – Final DI Rinse	Perform a final rinse using deionized (DI) water to eliminate residual contaminants.

Replace any decontamination solution that becomes visibly soiled to the point that effective cleaning is no longer achievable. All contaminated decontamination liquids shall be collected in DOT-approved 55-gallon drums and managed for proper sampling and disposal.

8.0 Waste Management Requirements

Analytical results from all waste samples—soil, stormwater, and decontamination liquids—shall be evaluated against applicable federal, state, and local waste characterization criteria to classify waste and determine appropriate disposal requirements. Applicable criteria include, but are not limited to:

- RCRA Toxicity Characteristic Leaching Procedure (TCLP) values
- California Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC) values
- Hazardous waste characteristics: corrosivity, reactivity, ignitability, and toxicity
- Landfill waste discharge requirements issued by the Regional Water Quality Control Board or other applicable local agency

Soil being considered for on-site reuse must satisfy all testing, analytical, regulatory screening criteria, and hazardous waste thresholds.

8.1 Waste Classification

Soil and liquid wastes generated at the Site may fall into one or more of the following waste classifications:

Classification	Criteria
Non-Hazardous soils with PFAS	Not listed under federal or state regulations; does not exhibit ignitability, corrosivity, reactivity, or toxicity; all regulated constituents below RCRA and non-RCRA thresholds.
California Hazardous (Non-RCRA)	Listed under California hazardous waste regulations or exhibits hazardous characteristics (TTLC and/or STLC exceeded) but does not meet federal RCRA criteria.
Federal Hazardous (RCRA)	Listed under RCRA or exhibits one or more hazardous characteristics; TCLP thresholds exceeded.

8.2 Waste Disposal

All solid and liquid wastes transported off-site for disposal or treatment must be accompanied by the appropriate manifest: either a Non-Hazardous Waste Manifest or a Uniform Hazardous Waste Manifest, as applicable. Each manifest must be signed by an authorized representative of the generator (Harbor Department).

The Harbor Department, as the waste generator, is responsible for selecting and approving all disposal and treatment facilities. The GC shall prepare a completed waste profile form and submit it to the Harbor Department for review and approval prior to any waste delivery. If any waste stream is classified as California (non-RCRA) or RCRA hazardous waste, the Harbor Department will obtain a site-specific EPA Identification Number for disposal of hazardous waste generated.

8.2.1 Soil Waste

Soil waste must be either reused on-site (if it meets regulatory screening criteria and Harbor Department approval) or disposed of at a Harbor Department-approved facility. Soil waste will be classified into one of the following categories based on analytical results:

- Non-hazardous and suitable for on-site reuse
- Non-hazardous and unsuitable for on-site reuse
- California Hazardous (Non-RCRA Hazardous)
- RCRA Hazardous

All RCRA Hazardous or California Hazardous Waste must be disposed of within 90 days of generation. Harbor Department-approved disposal and treatment facilities are listed below. Approval status is subject to change based on each facility's regulatory compliance record or the Harbor Department's directive.

Waste Category	Facility	Location	Notes
RCRA Hazardous Waste Landfill	Chemical Waste Management	Kettleman City, CA	
	Clean Harbors	Buttonwillow, CA	
	US Ecology / Republic Services	Beatty, NV	
CA Hazardous (Non-RCRA) Landfill	Chemical Waste Management	Kettleman City, CA	
	Clean Harbors	Buttonwillow, CA	
	US Ecology / Republic Services	Beatty, NV	
Non-Hazardous CIS Landfill	Waste Management Simi Valley	Simi Valley, CA	
	Republic Services Sunshine Canyon	Sylmar, CA	
Non-Haz TPH Thermal Treatment	Soil Safe Inc.	Adelanto, CA	

8.2.2 Liquid Waste

All RCRA Hazardous or California Hazardous liquid waste must be disposed of within 90 days of generation. Harbor Department-approved disposal and treatment facilities for liquid waste include:

- Clean Harbors — Wilmington, California (Non-Hazardous, California Hazardous, and RCRA Hazardous Liquid)
- World Oil Recycling — Compton, California (Non-Hazardous Liquid only)

8.2.3 Solid Waste

Solid waste including used PPE, debris, refuse, and construction materials shall be collected, segregated, and disposed of in accordance with applicable local, state, and federal regulations. All solid wastes shall be placed in covered, labeled containers or roll-off bins to prevent dispersion by wind or stormwater. Waste materials shall not be stockpiled directly on bare ground and shall be removed from the Site at regular intervals to maintain a clean, orderly work area.

Disposal shall occur only at permitted solid waste facilities authorized to accept the specific waste stream. The GC shall maintain documentation of all waste handling and disposal activities—including weight tickets, transporter information, and disposal receipts—and provide these records to the Harbor Department upon request.

8.3 Waste Documentation

The GC shall retain and submit the following records to the Harbor Department's Construction Division:

- Original laboratory analytical reports associated with waste characterization and disposal profiling
- Field work logs documenting waste sampling, handling, management, transportation, and disposal activities
- Waste disposal records, including signed waste manifests and weight tickets

All records shall be maintained in a complete, organized manner to ensure regulatory compliance and to facilitate verification of proper waste management.

9.0 Other Pollution Prevention and Control Measures

Preventive measures shall be implemented throughout the Site to ensure no accidental release of hazardous materials occurs during construction. The GC shall conduct routine visual inspections of the work area to verify compliance with this SMP and shall maintain written documentation of all inspections. Any unanticipated release shall be promptly contained, controlled, and characterized, with all associated wastes managed and disposed of in accordance with applicable regulations. Releases that impact or may impact waters of the State (e.g., channels, harbor, storm drains) shall be immediately reported to the Harbor Department for regulatory notification, as outlined in **Section 5.4**.

9.1 Material and Equipment Staging Area

Material and equipment staging areas shall be clearly identified on the Site and physically demarcated using cones, barricades, fencing, or equivalent controls. All fuels, oils, greases, hydraulic fluids, and other chemical products used or stored during construction shall be properly labeled and kept within the designated staging area. Containers shall remain closed when not in use and stored on pallets or within approved secondary containment systems to prevent contact with soil or stormwater.

The staging area shall be bermed around its perimeter to provide secondary containment capacity equal to at least 110 percent of the largest single container stored within the area. Berms, liners, and containment structures shall be inspected regularly for integrity, damage, or evidence of leaks; deficiencies shall be corrected immediately.

9.2 Truck Loading Procedures

Truck loading of CIS excavated soil shall be conducted only within a designated loading area approved by the Harbor Department. The loading area shall be prepared and maintained to minimize the potential for soil releases. Plastic sheeting shall be placed on the ground beneath and around the loading zone to capture any soil that may fall from the loader bucket or trucks during loading. Sheeting shall be secured against wind or equipment displacement and routinely inspected for tears, excessive soil accumulation, or other deficiencies.

Accumulated soil on sheeting shall be collected periodically and consolidated into the stockpile or loaded into trucks for off-site management. At the completion of loading activities, plastic sheeting shall be removed and disposed of appropriately—preferably with the final truck load transported off-site. The GC shall ensure loading activities do not track soil outside the designated loading area and shall maintain written records of loading procedures, inspections, and disposal activities.

9.3 Equipment Refueling and Maintenance

Equipment maintenance, fueling, lubrication, and refueling shall occur only within a designated maintenance area equipped with appropriate containment and spill-prevention controls, or alternatively off-site at a permitted facility. Drip pans, absorbent pads, and spill-prevention materials shall be used during all fueling and maintenance operations.

Preventive measures shall include proper storage and handling of materials, routine inspection of containers and equipment for leaks, and maintaining adequate quantities of spill response supplies (e.g.,

absorbents, booms, pads) near staging and maintenance areas. All personnel handling fuels or chemicals shall be trained in spill prevention, emergency response, and proper use of spill-response equipment.

Any spill shall be promptly contained, cleaned up, and disposed of in accordance with applicable regulatory requirements. The Harbor Department shall be notified of any spill and provided progress updates on containment and cleanup status, including when the spill is contained. Documentation of inspections, maintenance activities, and spill response actions shall be maintained by the GC and made available to the Harbor Department upon request.

10.0 Backfill Material Requirements

All backfilling shall be performed in accordance with project design specifications and applicable regulatory requirements. All imported backfill materials and any on-site reuse of excavated soil must comply with regulatory requirements and be approved by the Harbor Department.

The GC shall verify that all imported backfill is free of hazardous contaminants, oversized material, excessive organic matter, and construction debris prior to placement, to prevent the introduction of waste or hazardous materials into the Site. All backfill placement shall be coordinated with stockpiling, soil handling, and waste management procedures described in this SMP to ensure that soils from different sources are segregated and managed appropriately.

Backfill shall be placed in lifts and compacted to meet specified density and stability requirements. Soil that does not meet compaction or material quality requirements shall be removed, segregated, and either reprocessed or disposed of in accordance with the waste characterization and disposal procedures in this SMP. Compaction and placement activities shall be monitored by qualified personnel; all field observations and test results shall be documented and maintained as part of the Site's environmental compliance records.

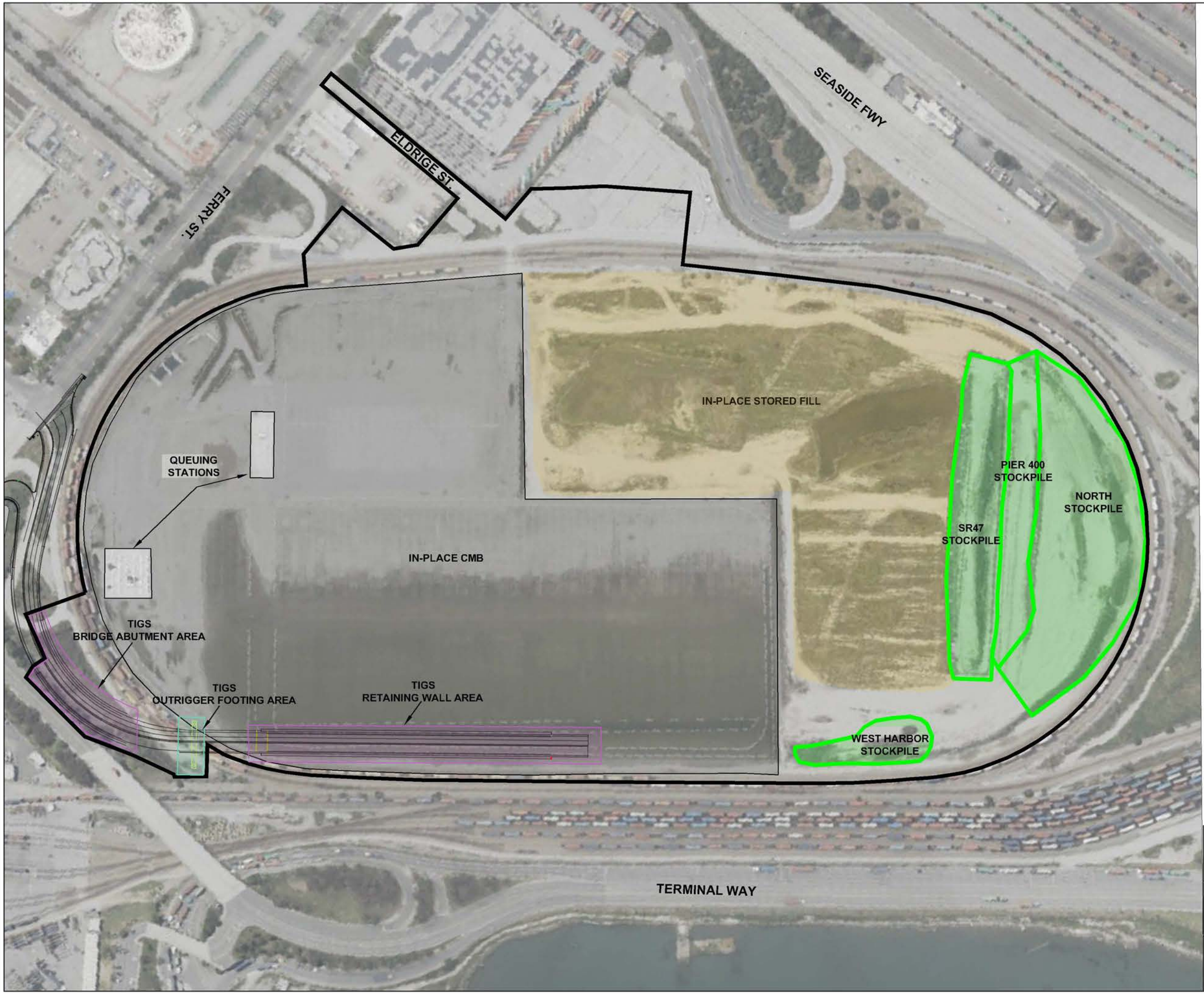
Dust suppression, erosion control, and proper soil handling practices shall be employed throughout backfilling operations to minimize dust generation, soil runoff, and cross-contamination. All activities shall be conducted consistently with the Site's overall environmental protection and waste management strategy to ensure regulatory compliance and protection of surrounding areas.

11.0 References

1. Pacific Edge Engineering, Inc. (2025). Environmental Assessment, Terminal Island Maritime Support Facility, LAXT Loop, Terminal Island, California (**Appendix A**).
2. Pacific Edge Engineering, Inc. (2017). Environmental Baseline Investigation, LAXT Loop, Terminal Island, California (**Appendix A**).
3. Ninyo & Moore (2026). Pre-Construction Waste Characterization Soil Sampling, Terminal Island Rail System Grade Separation Project, Terminal Island, California (**Appendix B**).
4. Parsons (2026). Technical Memorandum Documenting PFAS Sampling at LAXT, San Pedro, California (**Appendix C**).
5. Parsons (2026). PFAS - Addendum to Pre-Construction Waste Characterization Soil Sampling at LAXT TIGS Project, San Pedro, California (**Appendix C**).
6. Port of Los Angeles (POLA) (2021). Environmental Guidance for Industrial Fill Material, December 2021.
7. California Department of Toxic Substances Control (DTSC) (2001). Information Advisory: Clean Imported Fill Material.
8. South Coast Air Quality Management District (SCAQMD). Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. (**Appendix D**)
9. South Coast Air Quality Management District (SCAQMD). Rule 1466 – Control of Fugitive Dust from High Wind Erosion. (**Appendix D**)
10. South Coast Air Quality Management District (SCAQMD). Rule 403 – Fugitive Dust (**Appendix D**)
11. California Code of Regulations (CCR) Title 22, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste.
12. 40 CFR Part 261 – Identification and Listing of Hazardous Waste (RCRA).
13. 29 CFR 1910.120 – Hazardous Waste Operations and Emergency Response (HAZWOPER).
14. 29 CFR 1910.1200 – Hazard Communication Standard.
15. California State Water Quality Control Board – PFAS Sampling Guidelines, 2020 (**Appendix F**).

FIGURES

(1 and 2)



In-Place CMB Area

Stored Fill Area

Stockpiles

TIGS Retaining Wall & Abutment Area

TIGS Outrigger Footing Area

0 125 250 375 500

SCALE
1" = 250'

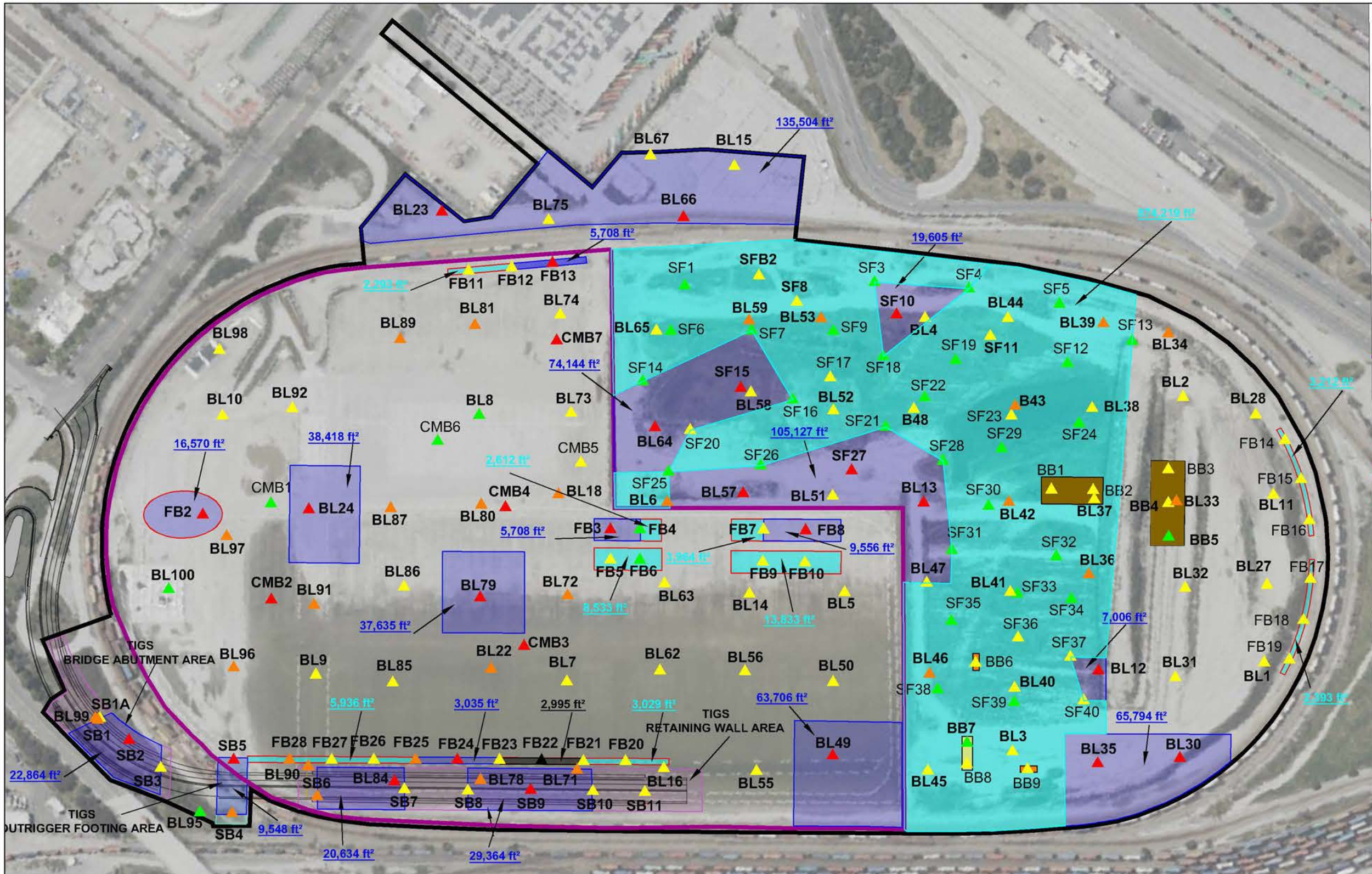
TERMINAL ISLAND SUPPORT FACILITY
LAXT LOOP
TERMINAL ISLAND, CALIFORNIA

SITE PLAN

Pacific Edge Engineering, Inc.

CHECKED BY:	CAS
DRAFTED BY:	CAS
FILENAME:	pola/25-10184/pd1/figures
DATE:	2/13/26

FIGURE 1



- ▲ Location of boring with soil exceeding California Non-RCRA Hazardous Waste Threshold
- ▲ Location of boring with soil exceeding environmental screening level for industrial use
- ▲ Location of boring with soil exceeding environmental screening level for residential use but does not exceed industrial screening level
- ▲ Location of boring with soil exceeding Harbor Department reuse criteria but not exceeding environmental screening level for residential use
- ▲ Location of boring with no exceedances
- Storm Drain Filtration Area
- Storm Drain Filtration Area
- Roadability and Maintenance Buildings. Data suggests soil can be reused from existing grade to 12' below grade without further sampling.
- Office Building. Data suggests soil can be reused from existing grade to 12' below grade without further sampling.
- Restroom Buildings. Data suggests soil can be reused from existing grade to 12' below grade without further sampling.
- Existing CMB Boundary.
- Areas where excavated soil must be properly disposed off-site.
- Area of Non-RCRA California Hazardous Waste that must be properly disposed.
- Areas where data suggests that soil can be reused from existing grade to 4' below grade without further sampling.
- Areas where data suggests that soil can be reused from existing grade to 9' below grade without further sampling

NOTES:

1. Existing CMB may be reused on-site only and must be placed as base material beneath asphalt or concrete.
2. Soil Beneath The Existing CMB has not been sampled to determine if It can be reused.
3. Soil Beneath In-Place Stored Fill has not been sampled below 4' of existing surface elevation to determine if it can be reused.
4. Soil Beneath Planned Buildings have not been sampled below 12' of existing surface elevation to determine if it can be reused.
5. Soil beneath Planned Filtration Areas have not been sampled below 9' of existing surface elevation to determine if it can be reused.
6. Soil beneath TIGS Bridge Abutment & Retaining Wall areas have not been sampled below 4.5' of existing surface elevation to determine if it can be reused.
7. Soil TIGS Outrigger Area has not been sampled below 7.5' of existing surface elevation to determine if it can be reused.
8. Areas not highlighted must be sampled to for reuse or disposal. Dataset is incomplete or uncertain to make a determination for reuse.
9. All BL locations are from the 2017 baseline investigation and have not been sampled recently and may be incomplete to make a soil reuse determination due to uncertainties with elevations and sample depths.

0 125 250 375 500

SCALE
1" = 250'

BORING	NORTHING	EASTING
FB2	1729487.7532	6482952.9005
FB3	1730350.6756	6483393.3387
FB4	1730413.9587	6483423.2595
FB5	1730319.8824	6483458.4192
FB6	1730383.1655	6483488.3400
FB7	1730679.1498	6483547.2889
FB8	1730769.0986	6483590.9833
FB9	1730645.6407	6483615.8634
FB10	1730735.5896	6483659.5579
FB11	1730304.7951	6482694.7007
FB12	1730398.9412	6482728.4130
FB13	1730493.0873	6482762.1253
FB14	1731890.5829	6483878.0930

BORING	NORTHING	EASTING
FB15	1731886.4351	6483977.9856
FB16	1731863.4555	6484075.2334
FB17	1731806.8434	6484201.9496
FB18	1731750.9043	6484284.0334
FB19	1731680.9996	6484354.5320
FB20	1730150.6983	6483907.1137
FB21	1730059.9604	6483865.0824
FB22	1729970.5968	6483820.1404
FB23	1729880.5439	6483777.9473
FB24	1729789.9906	6483735.5198
FB25	1729699.9377	6483693.3267
FB26	1729609.8848	6483651.1336
FB27	1729519.3315	6483608.7061

BORING	NORTHING	EASTING
FB28	1729429.2787	6483566.5130
BB1	1731338.7477	6483749.9243
BB2	1731428.6966	6483793.6187
BB3	1731611.1289	6483824.1330
BB4	1731577.2554	6483896.6086
BB5	1731543.6429	6483969.2741
BB6	1731002.3782	6484046.6305
BB7	1730903.4977	6484210.1492
BB8	1730881.9200	6484255.6288
BB9	1731007.1277	6484327.7352
SF1	1730755.0651	6482943.0562
SF2	1730924.5121	6482996.1008
SF3	1731166.0733	6483126.2226

BORING	NORTHING	EASTING
SF4	1731363.2739	6483235.3550
SF5	1731542.4922	6483358.5874
SF6	1730679.1666	6483026.9693
SF7	1730853.7860	6483107.3305
SF8	1730979.7844	6483091.4952
SF9	1731029.3796	6483190.4135
SF10	1731181.6077	6483218.0187
SF11	1731361.3212	6483358.4614
SF12	1731500.6662	6483494.7956
SF13	1731661.4579	6483511.5547
SF14	1730568.5918	6483107.4968
SF15	1730772.7892	6483219.6287
SF16	1730872.5829	6483297.0921

BORING	NORTHING	EASTING
SF17	1730976.0037	6483286.9673
SF18	1731111.2367	6483294.7091
SF19	1731263.0023	6483375.5612
SF20	1730621.1628	6483259.5219
SF21	1731045.1095	6483448.8101
SF22	1731159.2430	6483424.6455
SF23	1731327.2060	6483550.6336
SF24	1731465.1383	6483635.8738
SF25	1730533.0792	6483327.8503
SF26	1730737.4454	6483406.8159
SF27	1730928.8603	6483508.4669
SF28	1731134.8613	6483579.4496
SF29	1731273.5915	6483611.2879

BORING	NORTHING	EASTING
SF30	1731187.3733	6483721.8600
SF31	1731063.9457	6483780.7263
SF32	1731282.6703	6483898.5923
SF33	1731161.0641	6483940.0180
SF34	1731272.4120	6484005.6988
SF35	1730991.9682	6483932.8486
SF36	1731118.8380	6484034.9896
SF37	1731211.8563	6484129.0923
SF38	1730894.0023	6484066.1239
SF39	1731045.3885	6484170.1521
SF40	1731196.7676	6484235.8771
BL12	1731259.117	6484186.809
BL13	1731050.818	6483649.669

BORING	NORTHING	EASTING
BL23	1730306.0549	6482540.9499
BL24	1729721.9275	6483047.6507
BL49	1730601.2424	6484102.8396
BL57	1730672.0783	6483448.5765
BL64	1730549.1168	6483218.3738
BL66	1730820.5444	6482795.7084
BL79	1730001.7416	6483408.8865
BL84	1729632.8586	6483718.4662

TERMINAL ISLAND SUPPORT FACILITY
LAXT LOOP & GRADE SEPARATION PROJECT
TERMINAL ISLAND, CALIFORNIA

BORING LOCATIONS AND AREAS OF KNOWN NON-REUSE SOIL

Pacific Edge Engineering, Inc.

CHECKED BY:	CAS
DRAFTED BY:	CAS
FILENAME:	pola/25-10184/pd1/figures
DATE:	4/1/2026

FIGURE 2

TABLES AND APPENDICES

(Available upon request)