

PROJECT MEMORANDUM
SCE TRANSMISSION TOWER REPLACEMENT PROJECT

Date: May 11, 2020
To: Alex Holford, Environmental Specialist Associate, Port of Long Beach
From: Lisa Blewitt, CEQA Project Manager, Aspen Environmental Group
Subject: SCE Transmission Tower Replacement Project EIR Addendum

Introduction

In November 2017, the Port of Long Beach (POLB) Board of Harbor Commissioners certified the Southern California Edison (SCE) Transmission Tower Replacement Project Final Environmental Impact Report (FEIR), and approved SCE's proposed Project (hereinafter "Project" or "Approved Project"). The Approved Project will remove six existing SCE 66-kV power line facilities (transmission towers and conductor) between the Long Beach Substation (Pier S/Terminal Island) and the Harborgen Substation (Pier A) and replace them with two to three new, taller lattice steel tower structures (LSTs) and four tubular steel poles (TSPs). Additional modifications to towers just east of Harborgen Substation and within Long Beach Substation may be required based on final engineering. The new, taller towers will provide adequate vertical conductor clearance for larger ships to navigate within the Cerritos Channel.

On November 8, 2019, SCE requested to make minor technical modifications to the Approved Project and a correction to text in the FEIR. The three proposed changes include (1) adding an option to include ground improvements for two new foundations being installed for Tower M0-T2X on Pier S at the south side of the Cerritos Channel and M0-T3X located approximately 600 feet north of the Cerritos Channel on Pier B, (2) a revision to the Biota and Habitats Mitigation Measure BIO-4 to allow additional temporary and permanent impacts to the Southern Tarplant plant species due to the additional ground improvements, and (3) a correction to conflicting language in the FEIR regarding tower removal during the bird nesting season.

Purpose of this Addendum

This Addendum to the FEIR serves to evaluate the site-specific environmental impacts associated with the three modifications to the Approved Project requested by SCE. According to State CEQA Guidelines Section 15164(a), "the lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." An addendum may be prepared if only minor technical changes or additions are necessary. A brief explanation of the decision not to prepare a subsequent EIR must also be provided in the addendum, findings, or the public record.

State CEQA Guidelines Section 15162 lists the conditions that would require the preparation of a subsequent EIR or negative declaration rather than an addendum. These include the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The Approved Project is described in the subsequent section, *Project Description Summary*. The Approved Project and proposed modifications have been reviewed by the POLB according to State CEQA Guidelines Sections 15162 and 15163. As the CEQA Lead Agency, POLB has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR. An Addendum to the certified FEIR is the appropriate environmental documentation under CEQA for the proposed modifications to the Approved Project. This memo discusses the anticipated impacts associated with the proposed modifications to the Approved Project for each environmental issue previously identified in the FEIR.

Project Description Summary

The Approved Project will remove the existing SCE power facilities, which extend from Pier B to Pier S/Terminal Island, crossing the Cerritos Channel to the northwest of the Gerald Desmond Bridge, and replace them with taller towers that will provide adequate vertical conductor clearance (see FEIR Figure 1-2). Approximately 3,400 feet of existing 66 kV subtransmission line (six circuits – gold line on FEIR Figure 1-2), a 12 kV distribution line (green line on FEIR Figure 1-2), a telecommunications line, and associated lattice steel tower (LST) structures between the Long Beach Substation (Pier S/Terminal Island) and just south of the Harborgen Substation (Pier A), will be removed and replaced with new, taller structures, new conductor, optical ground wire, and overhead ground wire. A total of six 66 kV structures will be removed and replaced with two new LST structures, M0-T2X and M0-T3X (M0-T4 has since been determined not to require replacement) and four TSPs (see FEIR Figure 1-2). The new structures will be placed to the west along the existing 220 kV alignment (blue line on FEIR Figure 1-2).

Both of the new LST structures will require a new foundation system (four legs per LST). The four TSPs will each require a separate foundation between M0-T3X and M0-T4. As analyzed in the FEIR, the LST foundation systems include four poured-in-place pile caps (one under each tower leg) and may be tied together at grade with a reinforced concrete beam. Each TSP foundation may consist of a drilled, poured-

in-place concrete foundation. The foundation process for drilled shaft/piers would begin by drilling holes for each type of structure utilizing a hydraulic drill rig. The maximum depth below ground level for the proposed pile and/or piers is expected to extend to the competent soil. Actual depths for the structure foundations will depend on the soil conditions and topography at each site and will be determined during final engineering. Foundations in soft or loose soil that extend below the groundwater level may be stabilized with steel casings, temporary or permanent, and/or drilling mud slurry. Casings would be vibrated into place using a crane and vibratory hammer. Mud slurry may be placed in the hole during drilling to stabilize the side walls of the shaft below any casing. The concrete for the foundation would then be pumped to the bottom of the hole, displacing the mud slurry. The mud slurry brought to the surface would be collected in mobile steel storage tanks, and then pumped out of the pit to be reused or properly disposed of offsite. The foundations for the TSPs may consist of drilled piers, reinforced concrete caps supported by piles (M0-T3A), or equivalent. Following excavation of the foundation footings, steel reinforced cages would be placed by using a hydraulic crane, and then concrete would be poured. Steel reinforced cages (welded or tied steel rebar) would either be assembled on location (laydown area) or assembled at the construction yards and then delivered to each structure site. All spoils removed from the drilled shafts would be staged onsite prior to disposal offsite per an approved disposal plan. Per FEIR Section 1.5.2.8 (New Tower Construction and Conductor Stringing), alternate foundations that may be employed include displacement piles (12-inch M-pile and helical piles) and driven piles (precast pre-stressed concrete and open-ended pipe piles). However, the current geotechnical report (Wood, 2020) only includes drilled shafts (above) and driven pre-cast concrete piles for deep foundations.

Approximately 5,000 feet of existing 220 kV line, including six LST structures, will be removed (and not replaced) between Long Beach Substation and the Harborgen substation (blue line on FEIR Figure 1-2). Some modifications to the 220 kV structure immediately east of the Harborgen Substation (M1-T1A) may also be necessary.

The structures to be removed include four approximately 60-foot long rebar reinforced concrete pier foundations and three towers located in the Cerritos Channel (one foundation has no tower). The foundations are connected by an approximately 40-foot long concrete beam. Once the LST structures are disassembled and removed, the foundations may be removed utilizing temporary floating barges and sheet pile bulkheads.

Additional modifications, to be identified during final engineering, may also be required at other substations within SCE's system. Once completed, activities would be limited to routine maintenance and inspection. Construction is anticipated to last for approximately 24 months. Installation of new facilities and removal of existing facilities is expected to take approximately 12 months, with foundation removal utilizing the cofferdam removal method adjacent to Pier S expected to take an additional 12 months (24 months total). This schedule is subject to change and may be impacted by utility relocations and the availability of materials, labor, regulatory, or environmental constraints.

Project Modifications & FEIR Text Revision

Foundation Installation Modification – Addition of Ground Improvements. SCE has requested the addition of ground improvements to the driven pile foundation design for the new LST structures (M0-T2X and M0-T3X), which was not considered in the FEIR. The potential for lateral spreading of soil at the new LST structures was confirmed by further geotechnical investigation during the engineering design process for the Approved Project. Ground foundations would combat the effect of lateral spreading and allow driven piles to be viable at all locations. Each corner of LST M0-T2X to the south of Cerritos Channel

may be supported on cast-in-place concrete pile caps measuring approximately 32 feet wide by 44 feet long by 4 feet thick with each cap bearing on 12 110-foot long piles, or a total of 48 piles for each tower. Driven pile foundations for LST M0-T3X on the north side of the Cerritos Channel would consist of essentially the same design as LST M0-T2X, but with 115-foot long piles. For all foundations, the individual pile caps would be connected with tie-beams to control displacement between tower legs. Based on subsurface conditions, predrilling to within 10 to 15 feet of tip elevation is anticipated to facilitate driven pile installation. The footprint of required ground improvements may need to encompass the width of the caps, extend a minimum of approximately 20 feet north and south of the pile caps, and completely fill the space between the northern and southern caps on each side. The time needed to complete the additional foundation work (ground improvements) would extend the schedule by approximately 1.5 months. This work would occur in series with the pre-drilling of driven piles. Ground improvement work will require an additional five workers.

The estimated depth of ground improvements is approximately 80 to 120 feet below grade (Wood, 2020). Based on subsurface conditions, ground improvement options considered viable include deep soil mixing (DSM), jet grouting, or a combination of the two. DSM is an in-situ soil mixing technology that mixes existing soil with cementitious materials using mixing shafts consisting of auger cutting heads, discontinuous auger flights, and mixing paddles. The mixing equipment varies from single to eight shaft configurations depending on the purpose of the deep mixing. The soil-cement produced is generally stronger, less compressible, and less permeable than native soils. Jet grouting is a technique of mixing in-situ soil with a high-pressure slurry jet. A small-diameter rod is used to drill down to the improvement bottom. When the rod is withdrawn, it jets the cement-based slurry with air to produce an improved column. The compressed air and hardening agents (usually cement and water) are jetted with a high pressure and high discharge rate from jet monitors in a horizontal direction to construct larger diameter soil-cement columns. If DSM is used, it is expected that 8-foot diameter columns would be installed at a replacement ratio of approximately 50 percent.

The following is a list of additional equipment anticipated to be used alone or in combination to complete the proposed ground improvement construction task:

Deep Soil Mixing

- Large crane
- Grout tanks
- Water tanks
- Track excavator
- Skid loader or front-end loader

Jet grouting

- Slurry plant
- Higher pressure pump
- Compressor
- Excavator
- Skid loader or front-end loader

Revision of Southern Tarplant Mitigation Measure BIO-4. SCE has requested a modification to Mitigation Measure BIO-4 (Avoidance Measures for State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate, Rare, and other Special-Status Plants), which states:

Prior to Project construction activities (including site mobilization) or vegetation removal, any populations of listed or special-status plant species shall be protected and a buffer zone placed around each population. The buffer zone shall be established around these areas and shall be of sufficient size to eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. The size of the buffer depends upon the proposed use of the immediately adjacent lands, and includes consideration of the plant's ecological

requirements (e.g., sunlight, moisture, shade tolerance, physical and chemical characteristics of soils) that are identified by a qualified plant ecologist and/or botanist.

Because Southern Tarplant, a CRPR 1B.1 species is disturbance tolerant, up to 10 percent of the on-site population on the south side of Cerritos Channel may be temporarily impacted at any time of the plants life history; however, permanent impacts to the species shall be avoided. Temporary impacts may include activities such as crushing by construction equipment, vehicles, and/or foot traffic, leaving the seed bank intact, but not mechanical removal or herbicide application. Buffers, as described above, shall be placed around all occurrences of Southern Tarplant in the Project area outside of the temporary impact area of the Project.

Up to 10 percent of the on-site population of Southern Tarplant may be temporarily impacted. However, the proposed ground improvements to the new towers may result in up to an additional five percent of permanent impacts, resulting in a total of 15 percent temporary and permanent impacts. SCE has requested to add this five percent permanent impact to the language of Mitigation Measure BIO-4.

Correction of Conflicting Language in FEIR Section 3.2.5.1 Biota and Habitats Impacts and Mitigation Measures (Alternative 1 – Proposed Project) and Special Condition 6.3.2.1 of the Application Summary Report. SCE has requested to correct conflicting language regarding tower removal during bird nesting season in FEIR Section 3.2.5.1 and Special Condition 6.3.2.1 in the FEIR Chapter 6 Application Summary Report. The following is SCE's proposed correction to Section 3.2.5.1, Biota and Habitat Impacts, and Mitigation Measures (Alternative 1):

Impacts to active cormorant nests would be avoided through implementation of Special Condition (SC) 6.3.2.1 (Nesting Birds), which includes: ~~indicates that removal of transmission towers would be completed outside of the nesting season (approximately February through August) and that~~ Prior to the beginning of the nesting season, inactive nests would be removed and barriers such as netting, mooring balls, or other deterrents installed on transmission structures to preclude new nest construction. During construction in the nesting season, activities would be periodically monitored to ensure no new nest construction.

SCE noted that SC 6.3.2.1 does not preclude tower removal or construction during bird nesting season if the measures identified are followed. As such, SCE shall comply with SC 6.3.2.1 as described in the Application Summary Report and below:

6.3.2.1 Nesting Birds

Special Condition: To prevent taking active bird nests during the nesting season (approximately February through August), the following measures shall be implemented by the Permittee as appropriate:

Prior to the beginning of the nesting season, inactive nests will be removed and barriers such as netting, mooring balls, or other deterrents will be installed on transmission structures to preclude new nest construction.

During construction in the nesting season, activities will be periodically monitored to ensure that no new nest construction occurs within work areas.

Permittee shall provide weekly reports describing monitoring actions, relevant observations, and any protective actions taken to the POLB Director of Environmental Planning.

Environmental Analysis

This section describes the environmental impacts of the Approved Project and analyzes whether SCE's proposed modifications may result in new significant impacts or a substantial increase in the severity of significant impacts.

Biota and Habitats

Southern Tarplant fields, dominated by five small occurrences of the plant occurs near structure M0-T2 on the south side of the Cerritos Channel (see FEIR Figure 3.2-1). This species has a CRPR of 1B.1 but is not State or federally listed as threatened or endangered. The plants were found growing in hard compacted soils just north of a large asphalt parking area on Pier S and adjacent to stands of non-native species. This area consists of imported fill and the plant does not occur in natural habitat. Southern Tarplant likely occurs in this location as a result of windblown seed dispersal from other local occurrences or was imported in the fill material used to construct the pier.

Pursuant to the State CEQA Guidelines Appendix G (Environmental Checklist), impacts to terrestrial and aquatic biota and habitats would be considered significant if the Project would:

BIO-1: 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 CDFW or USFWS.

Consistent with CEQA guidelines, an impact caused by project construction or operation is considered significant if it would substantially affect local resident or migratory fish and wildlife populations, including any rare or endangered species, or the habitats that support those populations. The determination as to whether an effect is substantial is based on professional judgment and takes into account the magnitude and duration of the impact and the commercial, recreational, scientific, or regulatory status of the affected resource. For most occurrences of rare plants, including disturbance tolerant species such as Southern Tarplant, the loss of up to 10 percent of an occurrence would not constitute a significant impact under CEQA.

Southern Tarplant is considered rare in the State but is not threatened or endangered; therefore, impacts to a small number of this species would not be considered significant under CEQA thresholds. In general practice, the Port makes every effort to reduce or avoid permanent impacts to biota whenever possible. Therefore, Mitigation Measure BIO-4 and the zero-impact threshold for permanent impacts was based on preliminary coordination with SCE, who indicated that permanent impacts to Southern Tarplant could be avoided.

SCE is now proposing a five percent increase in the total percentage of the Southern Tarplant occurrence that would be disturbed as a result of the modifications to the Approved Project within the Project area. After considering the modifications it was determined that implementation of the revised Project would not be feasible with the current disturbance thresholds required by Mitigation Measure BIO-4 as written in the EIR. Based on the revised project description, we re-evaluated the impacts to this species based on the local occurrence, the abundance and distribution of the species on a local and regional level and the ability of the plant to recover after the completion of construction. Based on these factors we determined that the additional impacts, including the five percent permanent loss, would not constitute a significant impact to this species.

Revised Southern Tarplant Mitigation Measure BIO-4. Based on a consideration of the significance criteria, the status of Southern Tarplant, and the local and regional distribution of the species, Mitigation Measure BIO-4 (Avoidance Measures for State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate, Rare, and other Special-Status Plants), has been modified as follows:

Prior to Project construction activities (including site mobilization) or vegetation removal, any populations of listed or special-status plant species shall be protected and a buffer zone placed around each population. The buffer zone shall be established around these areas ~~and shall be of sufficient size to eliminate~~ reduce potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. The size of the buffer depends upon the proposed use of the immediately adjacent lands, and includes consideration of the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, physical and chemical characteristics of soils) that are identified by a qualified plant ecologist and/or botanist.

Construction activities may result in no more than 5 percent permanent loss of Southern Tarplant and no more than 10 percent temporary impacts of the on-site population on the south side of Cerritos Channel. Temporary impacts may include activities such as crushing by construction equipment, vehicles, and/or foot traffic, leaving the seed bank intact, but not mechanical removal or herbicide application. Buffers, as described above, shall be placed around all occurrences of Southern Tarplant in the Project area outside of the temporary and permanent impact area of the Project.

Geology and Soils

The proposed tower foundation change includes ground improvement to address liquefaction-induced lateral spreading of up to 6 to 7 feet that may occur at tower M0-T2X on the south side of Cerritos Channel (Wood, 2020). Minor lateral spreading of 0.6 feet was also calculated for tower M0-T3X which is located 600 feet north of the channel (Wood, 2020). The geotechnical report by Wood (2020) outlines ground improvement options of vibro-replacement stone columns (VSC), deep soil mixing, and jet grouting that would be completed prior to installation of the deep pile foundation (Note: SCE is not proposing the VSC option). Wood also indicates that two or more of the ground improvement schemes may be necessary and should extend to depths of 80 to 120-feet to reduce the lateral spreading and maintain lateral stability of the soil. Deep pile foundations are anticipated to be constructed to depths of 90 to 115 feet. The Wood (2020) geotechnical report is consistent with previous geotechnical reports and furthers the analysis and quantification of lateral spreading.

Implementation of the ground improvement schemes will require handling and off-site disposal of excess soil, as will the construction of deep cast-in-place concrete piles or the pre-drilling required for the driven pre-stressed concrete piles considered in the Approved Project. Soil erosion impacts will be mitigated by implementation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP) and appropriate best management practices (BMPs).

The proposed ground improvements address the geologic hazard of seismic-related ground failure including liquefaction and lateral spreading. As outlined in the geotechnical report (Wood, 2020), field inspection would occur by the Geotechnical Engineer of Record (GEOR) during ground improvement, indicator pile program, and pile installation. No new significant impacts will result from the addition of ground improvements at towers M0-T2X and M0-T3X. The proposed foundations consisting of ground improvements, followed by installation of deep pile systems, would be completed in accordance with the

geotechnical report recommendations (Wood, 2020), and therefore will not result in new significant impacts or result in a substantial increase in the severity of significant impacts.

Environmental Resources Not Substantially Affected by Project Modifications

The following evaluation summarizes the project-specific impacts of the Approved Project as analyzed in the FEIR, and then assesses whether the proposed modifications would result in any new significant impacts or a substantial increase in the severity of the significant impacts of the Approved Project.

Aesthetics

As discussed in FEIR Section 1.7.1 (Aesthetics), a significant aesthetic impact would occur if construction or operation of the Approved Project, as modified, would:

- (b) Have a substantial adverse effect on a scenic vista;
- (c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- (d) Substantially degrade the existing visual character or quality of the site and its surroundings; or
- (e) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

Explanation. The Approved Project is located in a designated Port Manufacturing Zone at Long Beach Harbor, which experiences heavy industrial uses such as cargo loading and unloading and ship traffic. No designated State or regional scenic highways are located in the Project vicinity. The Approved Project will replace power line infrastructure and will be consistent with the existing Harbor landscape and surrounding industrial uses in the vicinity. The Approved Project also removes the existing 220 kV line between the Long Beach and Harborgen substations, thereby reducing the amount of transmission infrastructure in the area, and as such will not increase the intensity of industrial development at the Harbor. Aviation lighting on the new towers will not substantially change the nighttime lighting conditions or create new sources of substantial light and glare. The proposed modifications would not cause any substantial additional aesthetic impacts because they involve ground improvements to tower foundations at ground level. Foundation design improvements would not change the tower design or location. As with the Approved Project, construction activities would be temporary. The Approved Project design, as modified, is consistent with the existing Harbor landscape and surrounding industrial uses in the Project vicinity. Therefore, the Approved Project, as modified, would not result in new significant impacts or a substantial increase in the severity of significant impacts.

Air Quality and Health Risk

As discussed in FEIR Section 3.1 (Air Quality and Health Risk), a significant air quality or health risk impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Produce construction emissions that exceed South Coast Air Quality Management District (SCAQMD) emission significance thresholds;
- (b) Result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance;

- (c) Expose receptors to significant levels of toxic air contaminants (TACs);
- (d) Conflict or obstruct implementation of the applicable air quality management plan (AQMP); or
- (e) Create objectionable odors at the nearest sensitive receptor.

Explanation. The Approved Project has the potential to produce significant levels of NO_x emissions during the construction phase. Implementation of Mitigation Measures AQ-1 (Tier 4 Final Off-Road Construction Equipment), AQ-2 (Electric-Powered Off-Road Engines and Equipment), AQ-3 (On-Road Construction Trucks), AQ-4 (Construction Traffic Emission Reductions), AQ-5 (Harbor Craft Emission Reductions), and AQ-6 (Helicopter Emission Reductions) will substantially reduce NO_x emissions during construction, but levels will still remain above the SCAQMD emission significance thresholds, resulting in a significant, unavoidable impact. The Approved Project's construction will result in off-site ambient air pollution concentrations that exceed the SCAQMD threshold of significance, but Mitigation Measures AQ-1 through AQ-5 will reduce impacts to less-than-significant levels. The Project will emit TACs such as diesel particulate matter, a carcinogen; but impacts will be temporary, short term, and approximately 0.74 mile from the nearest sensitive receptors. Mitigation Measures AQ-1 through AQ-3 and AQ-5 will ensure that the Approved Project will comply with relevant Clean Air Action Plans and construction best management practice measures to conform to the SCAQMD AQMP. The Approved Project is located more than a mile away from the densely populated areas of the City of Long Beach and any source of objectionable odors will disperse before they could affect a substantial number of people.

The proposed ground improvement activities would be completed for up to two LST foundations. The additional equipment anticipated to be used during the two activities, which may be used alone or in combination, to complete the proposed ground improvement construction task are described above under "Project Description Summary - Proposed Foundation Installation Modification". In addition, there would be up to 400 additional heavy haul truck round trips associated with spoil removal and off-road equipment delivery and removal and 5 additional daily construction worker commute trips for this proposed construction task.

The Approved Project includes substantial helicopter, marine vessel (tugboats), and off-road equipment use; and a large number of vehicle trips, including over 9,600 heavy truck trips. Therefore, the proposed ground improvement construction task would constitute a small increase in the overall construction requirements for the Approved Project, which includes the completion of approximately two dozen separate construction tasks over more than two years.

The proposed ground improvements would be completed between months 3 and 6 of the overall 25-month construction schedule. The NO_x emissions peak was determined to occur during the removal of the existing towers when there are both marine emissions sources and heavy lift helicopters operating at the same time. The proposed ground improvements would not occur during this peak NO_x emissions period. Additionally, the emissions from the proposed ground improvements would be well controlled by the existing mitigation measures that include the requirement to use off-road equipment with Tier 4 compliant engines and haul trucks that meet Port drayage truck emissions requirements. These mitigation measures would cause considerable NO_x emissions reductions for the proposed ground improvements construction task. Therefore, while the Project's NO_x emissions would remain significant; the emissions from this added task would not create a new peak NO_x emissions period or substantially increase NO_x emissions during other periods. Additionally, the emissions of other criteria pollutants and TACs would be similarly well controlled for this proposed construction task, such that the addition of this new task would

not create any new exceedances of the other SCAQMD criteria pollutant (CO, SO_x, VOC, PM₁₀, and PM_{2.5}) emissions thresholds or new exceedances of the SCAQMD health risk thresholds.

Compliance with existing mitigation measures would ensure that air quality impacts associated with Project construction activities would not substantially increase with implementation of the proposed modifications. Proposed modifications would occur in the same Project area and would not expose sensitive receptors to significant levels of TACs or objectionable odors. Compliance with existing mitigation measures would ensure that activities do not conflict with the SCAQMD AQMP. Therefore, the proposed changes do not result in new significant impacts or a substantial increase in the severity of significant impacts.

Agriculture and Forestry Resources

As discussed in FEIR Section 1.7.2 (Agriculture and Forestry Resources), a significant agriculture and forestry resources impact would occur if construction or operation of the Approved Project, as modified, would:

- (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 Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
- (d) Result in the loss of forest land or conversion of forest land to non-forest use; or
- (e) Involve other changes in the existing environment that, 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.

Explanation. The Approved Project is wholly within the POLB, a heavily built-out industrial landscape. The Project site is not located on designated Farmland, Williamson Act lands, forest lands, or other agricultural use lands. The proposed ground improvement would occur within the existing temporary impact areas identified for the Approved Project. As such, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Cultural, Historical, and Tribal Resources

As discussed in FEIR Section 3.3 (Cultural, Historical, and Tribal Resources), a significant cultural, historical, and tribal resources impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Diminish the integrity of historic resources and
- (b) Degrade or destroy unknown archaeological resources or tribal cultural resources.

Explanation. Removal of the transmission towers under the Approved Project, which contribute to the Long Beach Generating Station (P-19-018798), and the SCE Long Beach-Laguna Bell 66 kV and 220 kV Transmission Lines (P-19-192309), will diminish the integrity of these two historic resources resulting in irreversible changes to them even after implementation of Mitigation Measure CUL-1 (HAER Level II and

DPR Documentation of the Long Beach Generating Station and Transmission Towers and Long Beach-Laguna Bell 66 kV and 220 kV Transmission Lines).

Additionally, Approved Project construction could degrade or destroy unknown archaeological resources or tribal cultural resources. There is an extremely low potential for the Approved Project activities to encounter intact archaeological deposits, tribal cultural resources, or human remains due to the extensively disturbed nature of the area. However, Mitigation Measure CUL-2 (Unanticipated Discoveries) will provide protocols on how to treat discovered resources or human remains, and reduce impacts related to unanticipated discoveries to less than significant.

The proposed modification to ground improvements is related only to the construction of new towers. The same existing towers would be removed. As such, the tower ground improvements would not affect or worsen the impact to the two historic resources P-19-018798 and P-19-192309. Furthermore, in the unlikely event that cultural or tribal resources are unearthed during ground improvement activities, Mitigation Measure CUL-2 would keep impacts less than significant. As such, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Global Climate Change

As discussed in FEIR Section 3.8 (Global Climate Change), a significant global climate change impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Produce greenhouse gas (GHG) emissions that would exceed the SCAQMD threshold of 10,000 metric tons of carbon dioxide equivalent (CO₂e) per year;
- (b) Conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of GHG; or
- (c) Expose people and structures to a significant risk of loss, injury, or death involving flooding as a result of sea level rise (SLR).

Explanation. The Approved Project will generate GHG emissions during construction from the use of off-road equipment, on-road construction vehicle trips, marine vessels, and helicopters. With respect to operations, O&M requirements and related GHG emissions will not increase over the baseline conditions and will be well below the SCAQMD GHG emissions significance threshold. The Approved Project will not conflict with any applicable federal, state, or regional GHG emissions reduction plans, policies, or regulations. Mitigation Measures AQ-1 (Tier 4 Final Off-Road Construction Equipment), AQ-2 (Electric-Powered Off-Road Engines and Equipment), AQ-3 (On-Road Construction Trucks), and AQ-5 (Harbor Craft Emission Reductions) are required to ensure conformance with the POLB's Green Port Policy. All new transmission structures associated with the Approved Project will be located at elevations above sea level that will not require any SLR adaptive actions.

The proposed ground improvements¹ would not cause a substantial increase in the Approved Project's construction activities. The annual GHG emissions estimated for the Approved Project was 153 metric tons of CO₂e per year, which is substantially below the 10,000 metric tons per year threshold. Therefore, this proposed increase in construction activity would not exceed the SCAQMD threshold of 10,000 metric tons of GHG emissions per year. Proposed activities would continue to comply with applicable plans, policies and regulations. The ground improvements would not require any SLR adaptive actions as they

¹ See the Air Quality and Health Risk discussion for a description of the increased construction requirements.

would be located in the same Project area. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Hazards and Hazardous Materials

As discussed in FEIR Section 3.4 (Hazards and Hazardous Materials), a significant hazards and hazardous materials impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or reasonably foreseeable accidental spill or release of hazardous materials;
- (b) Be located on a site which is included on a list of hazardous materials sites and therefore create a substantial hazard to the public, workers, or the environment due to the exposure or mobilization of contaminants currently existing in the soil or groundwater;
- (c) Be 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, or within the vicinity of a private airstrip project could result in a safety hazard for people residing or working in the project area;
- (d) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;
- (e) Substantially increase the probable frequency and severity of consequences to people or property as a result of accidental release of a petroleum product or hazardous substance; or
- (f) Result in an inconsistency with the Port of Long Beach Risk Management Plan (POLB RMP).

Explanation. Under the Approved Project, hazardous materials such as fuels, oils, and other vehicle maintenance fluids will be used and stored in construction yards. There is potential for spills or leaks due to improper handling and storage or accidental release during construction activities. SCE will comply with the POLB's Master SWPPP and prepare a Project-level SWPPP. SCE will also implement Special Condition (SC) 6.3.5.1 (Safety Plan) which includes proper personal protective equipment work requirements, soil and air space monitoring requirements, documentation and reporting requirements, and action levels. Implementation of Mitigation Measure HAZ-1 (Hazardous Materials Management Plan) will reduce the Approved Project's impacts related to the transport, use, disposal or spill/release of hazardous materials to less than significant. Low levels of total petroleum hydrocarbons, volatile organic compounds, and metals exist both on and offshore, indicating a potentially significant impact. Excavation and dewatering during construction may encounter low levels of metals or other contaminants. Mitigation Measure HAZ-2 (Soil and Groundwater Management Plan) will reduce impacts related to existing contamination to less than significant. Impacts (e) and (f) will not occur because no hazardous materials or wastes will be used, manufactured, produced, or stored at the site during O&M activities, and the POLB Risk Management Plan will not apply.

Construction activities related to the proposed ground improvements for the new towers would comply with the same recommended mitigation measures which would reduce any potential significant impact to less than significant. The modifications would not change the Project's O&M activities nor cause it to violate any existing regulations regarding the handling, use, disposal, and storage of hazardous materials. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Hydrology and Water Quality

As discussed in FEIR Section 1.7.4 (Hydrology and Water Quality), a significant hydrology and water quality impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Violate any water quality standards or waste discharge requirements;
- (b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);
- (c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite or offsite;
- (d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite;
- (e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff;
- (f) Otherwise substantially degrade surface water and groundwater quality;
- (g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- (h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- (i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- (j) Cause inundation by seiche, tsunami, or mudflow.

Explanation. Construction of the Approved Project may include sediment excavation and/or dredging operations, removal of existing tower foundations, installation of new towers and foundations onshore, wire stringing activities, and horizontal directional drilling for relocating utilities. These and other ground-disturbing activities will require the use of construction equipment involving potentially hazardous materials such as fuels and oils which could result in storm water and non-storm water discharges to harbor waters. Disturbance of soil during construction could also result in soil erosion and lowered surface water quality through increased turbidity and sediment transport into the storm drain system and eventually into the harbor. All construction activities will be conducted in accordance with applicable laws and regulations such as the Clean Water Act, which requires compliance with the National Pollution Discharge Elimination System (NPDES) General Construction Permit (GCP). SCE will comply with the City of Long Beach MS4 NPDES Permit and the Port's Stormwater Quality Post Construction Guidance Manual and complete a Standard Urban Stormwater Mitigation Plan. Compliance with these requirements will ensure that the Project will not violate any water quality standards or waste discharge requirements. Construction of the Approved Project will include excavation activities that may require dewatering of up to 1.53 acre-feet, which is minor and will have little effect on groundwater availability. Minor dewatering will also have minimal effect on seawater intrusion. Construction of the new towers will not noticeably alter existing drainage patterns, impede or redirect flood flows, or expose people or structures to the risk of flooding.

The proposed modifications to new tower foundations would involve similar construction methods and equipment as the Approved Project activities. Ground improvements would not affect tower locations but would change the tower footing design. Ground improvements would not result in additional dewatering. All proposed construction activities would still comply with the requirements of applicable laws and

regulations, including the Clean Water Act, which requires compliance with the City of Long Beach MS4 NPDES GCP. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Land Use and Planning

As discussed in FEIR Section 1.7.5 (Land Use and Planning), a significant land use and planning impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Physically divide an established community;
- (b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- (c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

Explanation. The Approved Project will require SCE to acquire new right-of-way (ROW), but all new transmission towers will be located within or adjacent to an existing transmission line corridor. All Project activities will occur within the Long Beach Harbor and no long-term changes to Harbor access will occur. Therefore, the Approved Project will not create a physical barrier between land uses or established communities. The Project does not conflict with any of the Port Master Plan policies. No habitat conservation plan or natural community conservation plans exist, and therefore, are not applicable.

The proposed modifications would occur within the existing temporary impact areas identified for the Approved Project (i.e., within or adjacent to the existing transmission line corridor). As such, the land use and planning impacts of the proposed modifications would be identical to the Approved Project. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Marine Water and Sediment Quality

As discussed in FEIR Section 3.5 (Marine Water and Sediment Quality), a significant marine water and sediment quality impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Result in violation of regulatory standards or guidelines pertaining to marine water and marine sediment quality (e.g., California Water Code, Basin Plan, CWA, CTR, and Enclosed Bays and Estuary Plan).
- (b) Substantially alter water circulation or currents, or result in the long-term detrimental alteration of harbor circulation that would cause reduced water quality.
- (c) Result in flooding that could harm people, damage property, or adversely affect sensitive biological resources.
- (d) Result in wind or water erosion that causes substantial soil runoff or deposition not contained or controlled on site.

Explanation. Construction of the Approved Project will not violate any regulatory standards or guidelines pertaining to marine water and marine sediment quality. Sediment resuspension during dredging and excavation activities will be short-term, localized, and will return to baseline conditions after Project completion. Containment measures (e.g., cofferdam) will reduce the disturbance and resuspension of

bottom sediments, and the use of a turbidity curtain for in-water demolition will control turbidity. Mitigation Measures BIO-2 (Install Turbidity Devices), BIO-5 (Horizontal Drilling Contingency and Resource Protection Plan), HAZ-1 (Hazardous Materials Management Plan), and HAZ-2 (Soil and Groundwater Management Plan) will reduce the Approved Project's potential to violate regulatory standards related to marine water quality.

Construction of the Approved Project will not substantially alter water circulation or currents or result in the detrimental alteration of harbor circulation that would cause reduced water quality. The localized modifications from the removal of the in-water towers to tidal prism, flow area, or water storage are small compared with the Harbor tidal prism, overall Cerritos Channel flow area, and total water storage volume. The Approved Project will not substantially alter circulation. Construction will not affect flooding, so no harm to people, property, or sensitive biological resources will occur. Under the Approved Project, impacts related to wind and water erosion and runoff will be less than significant because the Project site is generally paved and will be covered by an NPDES permit that protects against erosion and runoff.

The proposed ground improvements would apply only to new towers, none of which are located within Cerritos Channel. As such no additional in-water excavation would be required. The ground improvement activities will not cause any additional utility relocations. SCE would remain responsible for complying with all relevant federal, state, and local regulations to minimize stormwater pollution from draining to the ocean to the maximum extent possible. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Mineral Resources

As discussed in FEIR Section 1.7.6 (Mineral Resources), a significant mineral resources impact would occur if construction or operation of the Approved Project, as modified, would:

- (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; or
- (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.

Explanation. No known mineral resources are located within the POLB or within the alignment of the Approved Project, according to the U.S. Geological Survey. The Approved Project activities will occur within the Wilmington Oil Field, but no active, inactive, or new oil wells are located within the Project work areas. The Approved Project will not result in the loss of availability of any known regionally or locally valuable minerals. The proposed modifications would occur within the same Project area and would not occur in any zones containing important mineral resources. The Proposed modifications would not result in the loss of availability of any locally or regionally important minerals. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Noise

As discussed in FEIR Section 3.6 (Noise), a significant noise impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Increase ambient noise levels by 3dBA Leq or more at any noise-sensitive receptor.
- (b) Result in construction noise levels exceeding the limits established by the City of Long Beach or City of Los Angeles at any noise-sensitive receptor property line.

- (c) Expose people to excessive ground-borne vibration or ground-borne noise levels.
- (d) Expose people residing or working in the Project area to excessive noise levels associated with airport operations.

Explanation. Helicopter use under the Approved Project during construction activities will generate noticeable temporary noise levels greater than 3dBA Leq at the closest sensitive receptors, resulting in a significant impact. Mitigation Measures AQ-6 (Helicopter Emission Reductions), N-1 (Helicopter Use Restrictions), and N-2 (Helicopter Flight Plan) will reduce noise impacts to the extent feasible, but the use of helicopters will still temporarily increase ambient noise levels at noise-sensitive receptors resulting in a significant and unavoidable impact. Construction noise levels will also exceed the limits established by the Long Beach Municipal Code (LBMC) at noise-sensitive receptors. Mitigation Measures AQ-6 and N-2 will reduce helicopter construction noise impacts to the extent feasible, but helicopter use will continue to exceed LBMC limits. These noise impacts are significant and unavoidable.

Approved construction activities will generate ground-borne vibration and ground-borne noise levels in the construction areas and adjacent to the haul routes; however, these levels will decline rapidly from the source and will not be near any vibration-sensitive land uses. Construction also will not expose people working in the Project area to excessive noise levels associated with airport operations. Construction workers will be required to wear protective hearing equipment. Helicopter flights between the Project site and other facilities will occur only for refueling and storage during construction (if not done at the site) and will pass overhead quickly, such that noise impacts from off-site overhead helicopter flights will be short-term and periodic and not significant.

Helicopter use during construction would not increase as a result of implementing additional ground improvements. Additionally, the types of equipment (and associated noise generated) required to implement the ground improvements are the same as or similar to those assumed for the Approved Project. As such, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Paleontological Resources

As discussed in FEIR Section 1.7.7 (Paleontological Resources), a significant paleontological resources impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Explanation. The Approved Project will have no impacts to paleontological resources because artificial fill, which has no paleontological significance due to its young age and engineered placement, underlies the entire Project area within the POLB. The proposed modifications to the Project would occur within the existing temporary impact areas identified for the Approved Project, also on artificial fill. Therefore, the proposed modification will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Population, Housing, and Businesses

As discussed in FEIR Section 1.7.8 (Population, Housing, and Businesses), a significant populations, housing, and businesses impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Induce substantial 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 housing, necessitating the construction of replacement housing elsewhere;
- (c) Displace substantial numbers of people necessitating the construction of replacement housing elsewhere; or
- (d) Displace substantial numbers of existing businesses necessitating the construction of replacement facilities elsewhere.

Explanation. Construction of the Approved Project will take approximately 24 months, requiring an estimated total workforce of up to 174 workers during the construction period. The existing labor pool within the greater Long Beach area will likely provide labor for the Project. Because of the adequate local labor pool, no significant influx of workers into the area is anticipated that would increase the demand for housing. Any increase in population and housing as a result of construction of the Approved Project will be less than significant. Construction workers patronizing local establishments during the construction period will be temporary and will not significantly induce employment or growth of businesses. The Approved Project will not displace any homes, businesses, or other structures located within the Project alignment or construction yards.

The proposed ground improvements to the new towers would occur within the existing temporary impact areas identified for the Approved Project and would not require a substantial increase in workforce. The ground improvement crew would consist of approximately five workers. Such a minor modification to the Approved Project activities would also not significantly cause any indirect growth-inducing impacts. No homes, businesses, or other structures are located within the Project area. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Public Services

As discussed in FEIR Section 1.7.9 (Public Services), a significant public services impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) 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:
 - Fire protection
 - Police protection
 - Schools
 - Parks
 - Other public facilities.

Explanation. The Approved Project site is contained entirely within the POLB, which is serviced by the Long Beach Fire Department, Long Beach Police Department, and Port Harbor Patrol for fire protection, police protection, and emergency services, respectively. Construction activities are considered compatible with the industrial nature of other activities surrounding the Project site. All Project activities will comply with safety measures regarding hazardous materials use and storage, and thus, construction and O&M of the Approved Project will likely result in a minimal need for fire or police services. If such a need arises,

public services are readily available within close proximity to the Project site. The proposed ground improvements to the new towers would remain compatible with the industrial nature of other similar activities surrounding the Project site. Construction operations and hazardous materials procedures would be the same as those of the Approved Project and therefore, would not increase the need for new or altered governmental facilities to provide additional public services. The proposed modifications would occur within the existing temporary impact areas identified for the Approved Project, and therefore would remain in close proximity to the Terminal Island Fire Station No. 24. No additional demand for police or security services would result. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Recreation

As discussed in FEIR Section 1.7.10 (Recreation), a significant recreation impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) 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) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment; or
- (c) Affect existing recreational opportunities.

Explanation. The majority of the relatively small labor force is anticipated to commute from the surrounding metropolitan areas of Long Beach and Los Angeles. There will not be a noticeable increase in workers and their families relocating to the Project area as a result of construction and O&M. As such, the Approved Project will not contribute to an increased use of, or demand for, parks or recreational facilities. The proposed modifications would not require a substantial increase in workforce or substantially increase the timeline for construction necessitating relocation of workers and their families. As such, no new significant impact to local parks or recreational facilities would occur. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Transportation and Traffic

As discussed in FEIR Section 3.7 (Transportation and Traffic), a significant transportation and traffic impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Increase an intersection's volume/capacity (V/C) ratio or level of service (LOS) in a manner that exceeds the applicable performance standard.
- (b) Increase the V/C ratio or LOS at any Congestion Management Program for Los Angeles County (CMP) monitoring station in a manner that exceeds the applicable performance standard.
- (c) Cause the average delay per vehicle to: (a) exceed 55 seconds (LOS D or E), or (b) cause an increase of 2 seconds or more average delay per vehicle at an at-grade crossing operating at LOS E (55 to 80 seconds) or add 1 second or more average delay to an at-grade crossing operating at LOS F (greater than 80 seconds).
- (d) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Explanation. Demolition and construction activities will generate temporary vehicle trips within the surrounding circulation system; however, temporary construction-related traffic associated with the Approved Project will not affect the LOS of any study area intersection compared to baseline conditions. The temporary additional vehicle trips on the CMP network will not exceed thresholds requiring a detailed analysis and are not expected to impact the performance of the CMP network. The Approved Project will not utilize rail facilities for the transfer of material or equipment during construction. Construction activities will not have any impacts to at-grade rail crossings. No public transit, bicycle, or pedestrian facilities exist within the Project area. Project-related barge activity will be subject to all maritime restrictions and requirements and will be scheduled by the POLB to minimize potential conflicts with container vessel traffic. Any support boat or barge used during on-site construction will be generally located away from normal navigational activities and will be coordinated with the Harbor Master. Exclusion zones will be implemented during conductor stringing/removal activities. Helicopter impacts to airspace and public safety will be reduced to a less-than-significant level with implementation of Mitigation Measure T-1 (Helicopter Use Plan).

Ground improvements would not change the overhead tower design or location or change construction of in-water towers. The proposed ground improvements would, however, result in up to 400 additional truck loads per towers. Assuming both LST structures (M0-T2X and M0-T3X) require the proposed ground improvements, up to 800 additional truck trips would occur over 6 months (See FEIR, Appendix D, Table 1, Activity 5 – Install Foundations). Additionally, five workers would be required specifically for the ground improvement activities. These additional trips would increase the maximum trips during construction (which occur during Month 5) from 530 to 571, a 7.7 percent increase. This minor increase in trips would not result in a noticeable change in the LOS of any study area intersection, as most intersections were determined to be minimally affected by the Approved Project (see FEIR Table 3.7-5) and this minor increase would not rise to a level that would change the LOS or noticeably change the volume-to-capacity (V/C ratio). With the additional trips, project generated traffic would result in approximately 115 passenger car-equivalent one-way trips in the peak hour, as opposed to the 106 trips under the Approved Project. This would remain below the 150 one-way threshold of significance for CMP freeway segment analysis. As such, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Utilities and Service Systems

As discussed in FEIR Section 1.7.11 (Utilities and Service Systems), a significant utilities and service systems impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- (b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- (c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- (d) Require new or expanded entitlements and resources;
- (e) 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;

- (f) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs; or
- (g) Not comply with federal, State, and local statutes and regulations related to solid waste.

Explanation. The Approved Project's construction and operation activities will comply with the Port's Master SWPPP and all requirements of the Los Angeles Regional Water Quality Control Board. No water will be used during operations. No new or expanded water facilities are anticipated to be required. Portable toilets will be available for construction workers, precluding the need for wastewater treatment. No new storm water drainage facilities will be added. Water use during construction for dust suppression will be sourced from a nearby hydrant. The hydrant will be metered appropriately and coordinated with the Port. No groundwater will be pumped at the site to meet water requirements. There will be sufficient water supply available to serve the Approved Project. All excavated spoils will be transported to an approved Port location or placed on shore with an impervious berm for drying, testing for contamination, and removal prior to disposal by dump truck at an approved recycling/disposal facility with sufficient capacity. During operations, no new additional waste beyond existing conditions will be generated. Disposal activities will comply with all federal, state, and local statutes and regulations related to solid waste. The proposed modifications will not cause any additional utility relocations from ground improvements. Utility expansions are not anticipated. The ground improvements would not change the Project's overall purpose or function, and therefore, would not require any additional wastewater treatment, drainage facilities, or any other expansions of utility systems. Therefore, the proposed modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Energy Conservation

As discussed in FEIR Section 1.8 (Energy Conservation), a significant energy conservation impact would occur if construction or operation of the Approved Project, as modified, would:

- (a) Conflict with adopted energy conservation plans or policies; or
- (b) Result in inefficient use of energy resources.

Explanation. The Approved Project will be subject to applicable policies including the POLB Energy Island Initiative, POLB Green Port Policy, POLB Sustainable Design and Construction Guidelines, and the San Pedro Bay Ports Clean Air Action Program, as well as state and federal energy efficiency regulations. Construction and O&M of the Project will comply with all applicable regulations. Construction activities will be planned and scheduled to maximize efficiencies and reduce the potential for energy resource inefficiencies. Energy consumption for the Approved Project is estimated to be approximately 62.4 billion British thermal units (BTUs) for the Landfill Disposal Option or 55.7 billion BTUs for the Marine Sediment Disposal Option, with the recommended mitigation measures incorporated. Selection of either option would require a minimal amount of energy representing less than one percent of statewide yearly energy consumption. Implementation of Mitigation Measures AQ-3 (On-Road Construction Trucks) and AQ-6 (Helicopter Emission Reductions) would further reduce energy consumption.

The proposed ground improvements² would cause a small increase to the overall construction activity and energy consumption requirements estimated for the Approved Project. Additionally, the Project would remain in compliance with all efficiency plans and regulations. Therefore, the proposed

² See the Air Quality and Health Risk discussion for a description of the increased construction requirements.

modifications will not result in new significant impacts or a substantial increase in the severity of significant impacts.

Conclusion

Based on the analysis of the proposed modifications, consisting of minor technical changes or additions to the Approved Project, none of the conditions identified in State CEQA Guidelines Sections 15162 and 15163 apply, which would require preparation of a subsequent or supplemental EIR. An Addendum to the certified FEIR is the appropriate environmental documentation under CEQA for the proposed modifications to the Approved Project. Under State CEQA Guidelines Section 15164, the Addendum need not be circulated for public review, but can be included in or attached to the FEIR. The Board of Harbor Commissioners shall consider the Addendum with the FEIR prior to making a decision on the project.

References

Wood (Wood Environment & Infrastructure Solutions, Inc.). 2020. Report of Geotechnical Investigation: Cerritos Channel Relocation Project, Proposed New Structures M0-T2X, M0-T3A, and M0-T3X, Port of Long Beach, Long Beach, California. Project 4953-18-0681. March 17.