

Executive Summary

This Draft Environmental Impact Report (EIR) has been prepared to address the proposed Phillips 66 Santa Maria Refinery Demolition and Remediation Project (Project). The applicant for the Project is Phillips 66 Company (Phillips 66 or the Applicant). The Santa Maria Refinery (SMR) is located in the southwestern corner of the County of San Luis Obispo (County), approximately one mile southwest of State Route 1, and approximately 3.5 miles west of the community of Nipomo, in the South County Coastal and South County Inland planning areas.

The location of the SMR is shown in Figure ES-1.

The purpose of the Executive Summary is to provide the reader with a brief overview of the Project, the anticipated environmental effects, and the potential mitigation measures that could reduce the severity of the identified impacts. The reader should not, however, rely exclusively on the Executive Summary as the sole basis for judgment of the Project.

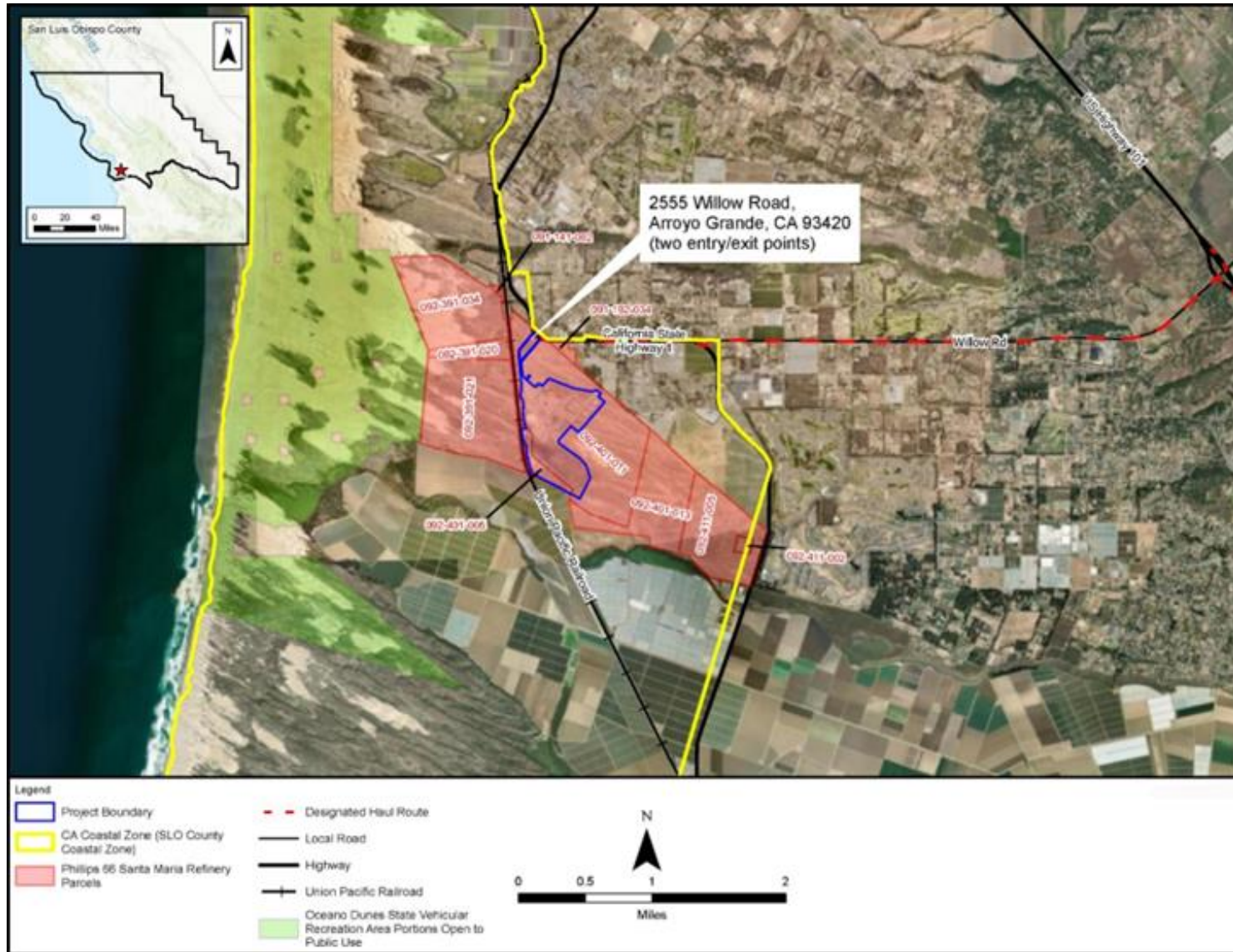
This Draft EIR is consistent with Section 15120–15132 of the California Environmental Quality Act (CEQA) Guidelines which sets forth requirements for contents of EIRs. Based upon the environmental impact analysis of the Project, a number of measures have been developed to mitigate the identified impacts associated with the Project. The County may incorporate the mitigation measures identified in the Draft EIR, where applicable, as conditions of approval in Project entitlements which may be granted for the Project. The environmental impact analysis will be used by the public and decision makers to help understand the scope of the Project and the associated environmental effects.

Proposed Project

Phillips 66 proposes to demolish aboveground infrastructure at the SMR and remediate the site. The Project is located at 2555 Willow Road (State Route 1) in an unincorporated area of the County, near Arroyo Grande and Nipomo, and approximately five miles west of U.S. Highway 101. The SMR site is located within the coastal zone.

The SMR was built in 1955 and operated continuously until January 2023. The SMR site includes petroleum storage and processing facilities for high-sulfur heavy crude oil. The crude oil was delivered primarily from offshore platforms along the California coast and oil fields in and near the Santa Maria Valley. The majority of crude oil was delivered to the SMR by pipeline; the remainder, which was approximately 2,000 barrels per day of petroleum-based products, was delivered by truck. Semi-refined liquid products from the SMR were transported by pipeline as feedstocks to the Rodeo Refinery in Contra Costa County, California, for upgrading into finished petroleum products. Other SMR products included petroleum coke (a byproduct of oil refining), which was shipped to off-site market destinations by rail and truck, and granular sulfur (recovered from the crude oil), which was shipped to off-site market destinations by truck.

Figure ES-1 Project Location



Source: Original Applicant Submission, Prepared by MRS as part of the EIR 2023

Phillips 66 recently obtained approval to transform the Rodeo Refinery, located in the community of Rodeo, in Contra Costa County, into a repurposed facility that will process renewable feedstocks into renewable diesel fuel, renewable components for blending with other transportation fuels, and renewable fuel gas. Because the Rodeo Renewed Project will discontinue the processing of crude oil at the Rodeo Refinery, the SMR is no longer necessary to provide feedstock to the Rodeo Refinery. Consequently, Phillips 66 submitted an application for Development Plan and Coastal Development Permit approval to the County of San Luis Obispo for demolition and remediation in August of 2022 and ceased crude oil processing at the SMR in January 2023. The Application was accepted for processing on March 15, 2023.

Project Impacts and Mitigation Measures

Based upon the Notice of Preparation (NOP) and scoping comments, 16 issue/resource areas were identified where potentially significant impacts could occur from the Project. The impact analysis for each of these issue areas is provided in the following subsections of Chapter 4.0, Environmental Impacts Analysis. The analysis of each issue area has defined the study area for purposes of the impact analysis. In most cases, the study area is the region that is in the vicinity of the Project.

For each identified issue area, the following framework was used:

- Environmental Setting;
- Regulatory Setting;
- Thresholds of Significance;
- Impact Assessment Methodology;
- Project-Specific Impacts and Mitigation Measures;
- Residual Impacts;
- Mitigation Measure Impacts to Other Issue Areas; and
- Cumulative Impacts.

The residual impact is the impact classification after any mitigation has been applied. If an impact is found to be *less than significant*, then the residual impact would remain *less than significant* with or without mitigation. All residual impacts identified in this document have been classified according to the following criteria:

- ***Class I - Significant and Unmitigable:*** Significant adverse impacts that cannot be effectively mitigated. No measures can be taken to avoid or reduce these adverse effects to insignificant or negligible levels.
- ***Class II – Less Than Significant with Mitigation:*** These impacts are potentially similar in significance to those of Class I impacts but can be eliminated or reduced below an issue area’s thresholds of significance by the implementation of mitigation measures.
- ***Class III – Less Than Significant:*** An adverse impact that does not meet or exceed an issue’s thresholds of significance. Generally, no mitigation measures are required for such impacts, although they may still be recommended should the lead or responsible agency deem it appropriate to reduce the impact to the maximum extent feasible.

- ***Class IV - Beneficial:*** Effects are beneficial to the environment.
- ***No Impact*** - A change that results in no impact on the environment relative to the environmental baseline.

If the impact remains at or above the pertinent threshold of significance after mitigation is applied, it is deemed to be *significant and unavoidable, Class I*. If a “significant impact” is reduced, based on compliance with mitigation, to a level below the pertinent threshold of significance, it is determined to no longer have a significant effect on the environment (i.e., to be *less than significant with mitigation, Class II*). If an action creates an adverse impact above the baseline condition, but such impact does not meet or exceed the pertinent threshold of significance, it is determined to be *less than significant, Class III*. An action that provides an improvement to an environmental issue area in comparison to the baseline information is recognized as a *beneficial impact, Class IV*.

Description of Project Alternatives

CEQA Section 15126.6, requires an EIR to describe a reasonable range of alternatives to a project or to the location of a project which could feasibly attain its basic objectives and evaluate the comparative merits of the alternatives. This section discusses a range of alternatives to the Project, including the “No Project” alternative. Criteria used to evaluate the range of alternatives and remove certain alternatives from further consideration are addressed. State CEQA Guidelines Section 15126.6 provides direction for the discussion of alternatives to the Project.

The alternatives identified for further detailed analysis and discussion in the environmentally superior alternative section are listed below:

1. No Project Alternative;
2. Full Removal of Facilities Alternative;
3. Removal of Offshore Facilities Alternative;
4. Additional Remediation and Cleanup Alternative; and
5. Conservative Removal Alternative.

Each is briefly described below. For more information, see Chapter 5.0, Alternatives.

1. No Project Alternative

Under the CEQA-required No Project Alternative, the demolition Project would not move forward. The SMR would remain in a shut-down, decommissioned state and no crude oil would be received or processed. It is possible that the SMR in its current state could be sold to an interested buyer, who would then design a project and submit an application to the County for review. This project would also need to go through the CEQA process, not unlike the process currently being implemented for the Project. This future use is speculative, however, and it is possible that the SMR would remain in a shut-down state for many years.

As CEQA also assumes that state regulatory schemes would be applicable, the remediation of contaminated soils and groundwater as required by the Central Coast Regional Water Quality Control Board (Central Coast Water Board) would still occur under this alternative.

2. Full Removal of Facilities Alternative

The Project as proposed identifies a number of facilities to remain in place for potential future use (surface hardscape, rail spurs, truck scale, wastewater outfall pipeline, etc.). Under this alternative, all facilities aboveground and belowground would be removed except those associated with Central Coast Water Board cleanup actions currently ongoing, which would include the following facilities:

- Groundwater monitoring wells; and
- The Slop Oil Line Release water remediation equipment and other remediation equipment that may be need as required by the Central Coast Water Board.

All other facilities would be removed as part of this alternative.

3. Removal of Offshore Facilities Alternative

The Project identifies a number of facilities proposed to remain in place for potential future use (surface hardscape, rail spurs, truck scale, wastewater outfall pipeline, etc.). Under this alternative, all of these facilities would remain as proposed except for the wastewater outfall pipeline, which would be removed. The wastewater outfall line is currently under a lease to the California State Lands Commission (CSLC) which expires in 2028.

4. Additional Remediation and Cleanup Alternative

The Project proposes to remediate the site to industrial standards, consistent with the Industrial land use designation. Under this alternative, the site would be remediated to different, higher standards than requirements for Industrial land uses, upon approval from the Central Coast Water Board. Because a higher standard of remediation and cleanup could provide some environmental benefits and/or produce greater impacts (more truck trips, etc.) and full disclosure to the public is warranted, this alternative has been retained for full analysis in this section.

5. Conservative Removal Alternative

The Project would involve removal of aboveground equipment and then belowground equipment only where remediation is required. This would entail leaving a potentially substantial amount of materials belowground (i.e., pipe segments, concrete footings) as most of the belowground infrastructure may not be located in areas of the site that would require remediation. This alternative would involve the removal of nearly all belowground infrastructure, grading of a high percentage of the site and revegetation of those graded areas, resulting in about 81 percent of the site being vegetated as opposed to the Project level of 49 percent. Some areas would remain “hardscaped”, including gravel and crushed concrete, for potential future use (primarily Area 3, Process and Electrical Substation/Switchyard; see Figure 2-3), and the items proposed to remain related to regulatory requirements (monitoring wells, groundwater remediation infrastructure)

and other potential future use infrastructure (rail spur, electrical systems, wastewater outfall, etc.) would also remain.

Summary of Impacts

The alternatives, as listed above, have been carried forward for comparison in the analysis of the environmentally superior alternative. Table ES.1 at the end of this section summarizes the impacts of the Project for each of the pertinent issue areas, their level of impact and proposed mitigation measures, and provides a comparison of the Project to the alternatives. Detailed mitigation measures are listed in Chapter 7.0, Mitigation Monitoring and Reporting Program.

One *significant and unavoidable (Class I) impact* is identified as part of the Project. This is related to the short-term construction activities that would increase the emissions of particulate matter on the Nipomo Mesa (impact LUP.2). The Nipomo Mesa is classified as Level of Severity III for Air Quality by the County's Resource Management System in the General Plan Conservation Element Policy AQ 3.3. This policy states:

Avoid a net increase in criteria air pollutant emissions in planning areas certified as Level of Severity II or III for Air Quality by the County's Resource Management System (RMS).

The Nipomo Mesa has a history of particulate matter impacts, primarily due to the dunes located to the west of the Project site (see Section 4.3, Air Quality). Although the Project would emit particulate matter levels below the San Luis Obispo County Air Pollution Control District (SLOCAPCD) thresholds, it would still generate a "net increase" in particulate matter on the Mesa and therefore be in conflict with land use policy AQ 3.3 and potentially contribute to existing health impacts from particulate matter on the Mesa. Note that long-term particulate matter emissions (impact LUP.3) would decrease with the Project implementation and is considered beneficial.

Another significant and unavoidable impact is potential impacts on black abalone associated with two of the alternatives: 2. Full Removal, and 3. Offshore Facilities Removal (outfall).

Environmentally Superior Alternative

This section summarizes the environmental advantages and disadvantages associated with the Project and the alternatives evaluated above. Based upon this discussion, the environmentally superior alternative is selected as required by CEQA. The CEQA Guidelines Section 15126.6(e)(2), state that if the environmentally superior alternative is the No Project Alternative, then the next most environmentally-preferred alternative from among the other alternatives must also be identified.

CEQA does not provide specific direction regarding the methodology of comparing alternatives and the Project. Each project must be evaluated for the issues and impacts that are most important; this will vary depending on the project type and the environmental setting. Issue areas with significant and unavoidable (Class I) long-term impacts are generally given more weight in

comparing alternatives. Impacts that are short term (e.g., construction-related impacts) or those that can be mitigated to less than significant levels are generally considered to be less important.

CEQA indicates that:

The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (Section 15126.6)

All of the alternatives present a wide range of potential activities at the site, from a minimal disturbance of existing infrastructure but still achieving the required regulatory soil remediation (No Project Alternative) to the full removal of all infrastructure not required for regulatory purposes (Full Removal Alternative). The goal of the alternatives analysis under CEQA is the reduction in the severity or elimination of significant and unavoidable impacts.

None of the alternatives would eliminate or reduce the severity of the significant and unavoidable short-term land use impact related to the creation of particulate emissions on the Nipomo Mesa. Most of the alternatives would actually increase either the level of particulate or the duration of particulate emissions. As the Project has the lowest severity associated with the potential particulate impacts, and the Project would achieve the Project objectives, the Project is considered the environmentally superior alternative. The No Project Alternative would also keep particulate emissions to a minimum but may introduce feasibility issues related to achieving soil remediation as not all of the aboveground infrastructure would be removed and therefore may not achieve the Project objectives.

Note that all other alternatives, except for the No Project Alternative, while not presenting CEQA advantages in reducing significant and unavoidable impacts (see beneficial discussion below), also achieve the Project objectives.

Known Areas of Controversy and Uncertainty

CEQA requires that an EIR discuss areas of controversy known to the Lead Agency including issues raised by agencies and the public (CEQA Guidelines Section 15123 (b)(2)). Controversial issues related to the Project are primarily those related to potential future use of the site or related to coastal access requirements. See Section 4.14, Recreation and Coastal Access, for more discussion. As the Nipomo Mesa has a history of elevated particulate matter (see Section 4.3, Air Quality), air quality issues related to dust are a concern, as noted by the designation of the short-term net air quality increase in dust emissions during the Project being a Class I significant and unavoidable impact.

Impact Summary Tables

An Impact Summary Table for the Project is provided as Table ES.1 on the following pages. This table summarizes the impacts and mitigation measures for the Project. The Project impacts and mitigation measures are discussed in further detail in Chapter 4.0. The alternatives to the

Project are discussed in Chapter 5.0 and a detailed listing of mitigation measures is included in Chapter 7.0, Mitigation Monitoring and Reporting Program.

Long-Term Beneficial Impacts

The environmentally superior alternative analysis above is focused primarily on alternatives that could result in elimination or a reduction in the severity of significant and unavoidable impacts, as per CEQA. Impacts that are less than significant or beneficial usually do not come into play for the determination of the environmentally superior alternative. However, in order to provide full disclosure to the public and the decision makers, this section briefly summarizes the potential beneficial impacts associated with the long-term aspects of the Project.

Most projects that require CEQA are development-type projects, where facilities are being installed or operations of an existing facility are being expanded. For a project where demolition of an existing facility is proposed as the project, CEQA normally does not identify extensive impacts as the baseline is usually greater than the effects of the project, particularly in the long-term, post-construction period when the historical operations will have ceased, and the facility has been removed.

There are a number of issues areas where the Project would produce beneficial impacts over the long term. There are also some issues areas that produce benefits both in the short term (during construction), and in the long term as well. Issue areas producing benefits in both the short and long terms, and that do not have other aspects of their impacts which require mitigation or are not beneficial, are defined in this EIR as a Class IV beneficial impact. These are listed below and called out as Class IV beneficial impacts in their respective sections:

- Aesthetics due to an elimination of the SMR structures in the coastal zone and visible from Highway 1 and other areas;
- GHG due to reduction in operational GHG emissions; and
- Hydrology and Water Quality due to reductions in groundwater use.

Issue areas and impacts that are identified as long-term beneficial impacts but that do have some short-term impacts are not identified as Class IV but are discussed in each issue area and are listed below:

- Air Quality; operational criteria pollutant emissions, toxic emissions and odors would be reduced in the long term, but would occur in the short term related to construction;
- Hazardous Materials due an elimination of contaminated soils and upset hazards, would be reduced in the long term, but would occur in the short term related to construction;
- Land use impacts are beneficial in the long term due to the elimination and associated reduction in on-site particulate emissions on the Nipomo Mesa, but would increase in the short term (resulting in a Class I Land Use impact);
- Noise reduction due to the elimination of the operating refinery noise, would be reduced in the long term, but would occur in the short term related to construction;

- Transportation would be reduced in the long term due to the elimination of truck trips from the SMR, but would occur in the short term related to construction; and
- Wildfire risks, due to the elimination of industrial facilities in a fire zone, would be reduced in the long term, but would occur in the short term related to construction.

Table ES.1 Summary of Impacts and Mitigation Measures

Issue Area and Impact	Impact Number	Description	Project Impact Class	Mitigation Measures	Alternatives				
					No Project	Full Removal	Offshore Facilities Only	Additional Remediation	Conserv. Removal
Aesthetics	AE.1	Scenic Vistas	IV	None	IV↓	IV	IV	IV	IV
	AE.2	Visual Quality and Character	IV	None	IV↓	IV	IV	IV	IV
	AE.3	Light and Glare	IV	None	IV↓	IV	IV	IV	IV
Agricultural Resources	AG.1	Farmland Conversion	III	None	III	III	III	III	III
	AG.2	Williamson Act	III	None	III	III	III	III	III
	AG.3	Zoning Conflict	III	None	III	III	III	III	III
	AG.4	Indirect Conversion	II	AQ.1-1: Demolition & Remediation Activity Management Plan	II↓	II↑	II↑	II↑	II↑
Air Quality	AQ.1	Criteria Pollutants Construction	II	AQ.1-1: Demolition & Remediation Activity Management Plan	II↓	II↑	II↑	II↑	II↑
	AQ.2	Criteria Pollutants Operations	III	None	III	III	III	III	III
	AQ.3	Toxic Emissions	II	AQ.3-1: Clean Construction Equipment	II↓	II↑	II	II↑	II↑
	AQ.4	Odors	II	AQ.4-1: Odor Control and Purging Plan	II↓	II	II	II↑	II
	AQ.5	Clean Air Plan	II	AQ.5-1: Recordkeeping	II	II	II	II	II
Biological Resources	BIO.1	Special-Status Plants or Wildlife	II	BIO.1-1: Worker Environmental Awareness Program BIO.1-2: Biological Resources Adaptive Management & Monitoring Plan BIO.1-3 Habitat Restoration and Revegetation Plan BIO.1-4 Weed Management Plan	II↓	II↑	II↑	II↑	II↑

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Issue Area and Impact	Impact Number	Description	Project Impact Class	Mitigation Measures	Alternatives				
					No Project	Full Removal	Offshore Facilities Only	Additional Remediation	Conserv. Removal
	BIO.2	Nipomo Mesa Lupine	II	BIO.2-1: Lupine Surveys BIO.2-2: Lupine Avoidance BIO.2-3: Habitat Creation	II↓	II↑	II↑	II↑	II↑
	BIO.3	CRPR 1-4 Plant Species	II	BIO.3-1: Plant Surveys BIO.3-2: Plant Salvage BIO.3-3: Habitat Creation BIO.3-4: Habitat Creation	II↓	II↑	II↑	II↑	II↑
	BIO.4	Monarch Butterfly	II	BIO.4-1: Butterfly Surveys	II↓	II↑	II↑	II↑	II↑
	BIO.5	Western Bumble Bee	II	BIO.5-1: Bee Surveys & Avoidance Measures	II↓	II↑	II↑	II↑	II↑
	BIO.6	Red-legged Frog	II	BIO.6-1: Frog Measures	II↓	II↑	II↑	II↑	II↑
	BIO.7	Legless Lizard	II	BIO.7-1: Lizard Surveys	II↓	II↑	II↑	II↑	II↑
	BIO.8	Nesting Birds	II	BIO.8-1: Nesting Bird Surveys & Avoidance BIO.8-2: Owl Surveys	II↓	II↑	II↑	II↑	II↑
	BIO.9	Roosting Bats	II	BIO.9-1: Bat Surveys and Measures	II↓	II↑	II↑	II↑	II↑
	BIO.10	American Badgers	II	BIO.10-1: Badger Surveys & Relocation	II↓	II↑	II↑	II↑	II↑
	BIO.11	Dune Lupine/Scrub	II	BIO.11-1: Coastal Dune Scrub Avoidance	II↓	II↑	II↑	II↑	II↑
	BIO.12	ESHA	II	BIO.12-1: ESHA Protection Plan	II↓	II↑	II↑	II↑	II↑
	BIO.13	Wetlands	III	None	III	III	III	III	III
	BIO.14	Species Movement	II	BIO.4-1, BIO.5-1; BIO.6- BIO.7-1, BIO.8-1, BIO.8-2, BIO.9-1, BIO.10-1	II↓	II↑	II↑	II↑	II↑
	BIO.15	ESHA Policies	II	BIO.12-1: ESHA Protection Plan	II↓	II↑	II↑	II↑	II↑
	BIO.16	Protected Tress	II	BIO.16-1: Tree Avoidance and Replacement	III	III	III	III	III

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Table ES.1 Summary of Impacts and Mitigation Measures

Issue Area and Impact	Impact Number	Description	Project Impact Class	Mitigation Measures	Alternatives				
					No Project	Full Removal	Offshore Facilities Only	Additional Remediation	Conserv. Removal
	BIO.17	Habitat Conservation Plans	III	None	III	III	III	III	III
	BIO Marine.1-1	Black Abalone	I	Alt-Fullremoval-BioMarine.1-1 Preconstruction Survey for Black Abalone	NA	I	I	NA	NA
Cultural and Tribal Cultural Resources	CT.1	Historical Resources	III	None	III	III	III	III	III
	CT.2	Archaeological Resources	II	CT.2-1: Archaeologists CT.2-2: Archaeological Monitors CT.2-3: Monitoring & Discovery Plan CT.2-4: Inadvertent Discoveries CT.2-5: Worker Environmental Awareness Program	II↓	II↑	II↑	II↑	II↑
	CT.3	Unknown Human Remains	II	CT.3-1: Discovery of Human Remains	II↓	II↑	II↑	II↑	II↑
	CT.4	Tribal Resources	II	CT.4-1: Chumash Tribal Monitors CT.4-2: Archaeological & Tribal Monitoring	II↓	II↑	II↑	II↑	II↑
Energy	EN.1	Energy Use and Supplies	III	None	III	III	III	III	III
	EN.2	Compliance with Energy Standards	III	None	III	III	III	III	III
Geology and Soils	GEO.1	Unstable Earth Conditions	III	None	III	III	III	III	III
	GEO.2	Earthquake Fault Zone	III	None	III	III	III	III	III

Table ES.1 Summary of Impacts and Mitigation Measures

Issue Area and Impact	Impact Number	Description	Project Impact Class	Mitigation Measures	Alternatives				
					No Project	Full Removal	Offshore Facilities Only	Additional Remediation	Conserv. Removal
	GEO.3	Soil Erosion	III	None	III	III	III	III	III
	GEO.4	Structures on Expansive Soil	III	None	III	III	III	III	III
	GEO.5	Safety Element	III	None	III	III	III	III	III
	GEO.6	Mineral Resources	III	None	III	III	III	III	III
Greenhouse Gas Emissions	GHG.1	GHG Emissions	IV	None	IV	IV	IV	IV	IV
	GHG.2	Compliance with GHG Plans	III	None	III	III	III	III	III
Hazards and Hazardous Materials	HAZ.1	Routine Hazards	II	HAZ.1-1: Contaminated Soil Management Plan	II	II	II	II↑	II
	HAZ.2	Upset Hazards	II	HAZ.2-1: Spill Response Planning HAZ.2-2: Asbestos and Lead Handling Plan	II	II↑	II↑	II	II
	HAZ.3	Hazards Proximate to Schools	III	None	III	III	III	III	III
	HAZ.4	Listed Hazard Sites	II	HAZ.4-1: Sitewide Sampling and Remediation Plan	II	II	II	II	II
	HAZ.5	Proximity to Airport	III	None	III	III	III	III	III
	HAZ.6	Impair Emergency Response	III	None	III	III	III	III	III
	HAZ.7	Wildfire Risks	II	HAZ.7-1: Fire Response Planning	II	II↑	II↑	II	II
Hydrology and Water Quality	HWQ.1	Degrade Surface or Groundwater Quality	II	HAZ.2-1: Spill Response Planning	II↓	II↑	II↑	II↑	II↑
	HWQ.2	Groundwater Quality	III	None	III	III	III	III	III
	HWQ.3	Stormwater Capacity	III	None	III	IV	III	III	IV

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Issue Area and Impact	Impact Number	Description	Project Impact Class	Mitigation Measures	Alternatives				
					No Project	Full Removal	Offshore Facilities Only	Additional Remediation	Conserv. Removal
	HWQ.4	Soil Adsorption	III	None	III	IV	III	III	IV
	HWQ.5	100-year Flood Zone	III	None	III	III	III	III	III
	HWQ.6	Drainage patterns	III	None	III	IV	III	III	IV
	HWQ.7	Water Service Provider	IV	None	IV	IV	IV	IV	IV
	HWQ.8	Flooding Losses	III	None	III	III	III	III	III
Land Use and Planning	LUP.1	Divide a Community	III	None	III	III	III	III	III
	LUP.2	Policy Conflict: Short-Term Particulate	I	AQ.1-1: Demolition & Remediation Activity Management Plan AQ.3-1 Clean Construction Equipment	I↓	I↑	I↑	I↑	I↑
	LUP.3	Policy Conflict: Long-Term Particulate	IV	None	IV	IV	IV	IV	IV
	LUP.4	Policy Conflict: Coastal Access	III	None	III	III	III	III	III
Noise	NOI.1	Noise Increases	II	NOI.1-1: Nighttime Activities Limits NOI.1-2: Construction Noise Control Measures	II↓	II↑	II	II↑	II
	NOI.2	Vibration	III	None	III	III	III	III	III
	NOI.3	Airport Proximity Noise	III	None	III	III	III	III	III
Public Services, Utilities and Service Systems	PSU.1	Fire Services	III	None	III	III	III	III	III
	PSU.2	Police Services	III	None	III	III	III	III	III
	PSU.3	LMUSD	III	None	III	III	III	III	III
	PSU.4	Park Facilities	III	None	III	III	III	III	III
	PSU.5	Water, Utilities	III	None	III	III	III	III	III
	PSU.6	Water Supplies	III	None	III	III	III	III	III
	PSU.7	Wastewater	III	None	III	III	III	III	III

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Issue Area and Impact	Impact Number	Description	Project Impact Class	Mitigation Measures	Alternatives				
					No Project	Full Removal	Offshore Facilities Only	Additional Remediation	Conserv. Removal
	PSU.8	Solid Waste	III	None	III	III	III	III	III
Recreation and Coastal Access	REC.1	Parks	III	None	III	III	III	III	III
	REC.2	Rec Facilities	III	None	III	III	III	III	III
Transportation	TR.1	Vehicle Miles Traveled	II	TR.1-1: Construction Traffic Management Plan	III↓	II↑	II↑	II↑	II↑
	TR.2	Train Trips	III	None	III	III	III	III	III
	TR.3	Roadway Safety	III	None	III	III	III	III	III
Wildfire	WF.1	Exacerbated Wildfire Risks	II	HAZ.7-1: Fire Response Planning	II	II↑	II↑	II	II
	WF.2	Infrastructure Installations	III	None	III	III	III	III	III
	WF.3	Slope and Landslide Fire Risks	III	None	III	III	III	III	III

Notes: ↓ = decrease in severity; ↑ = increase in severity. Class I – significant and unavoidable; Class II – significant but mitigable; Class III – less than significant; Class IV – Beneficial. Generally, all Class III impacts are considered similar and are not assigned arrows indicating increase or decrease in severity.

