

7 Environmental Impact Statement

7.1 Cover Sheet

7.1.1 Environmental Impact Statement Determinations and Compliance Findings for HUD-Assisted Projects 24 Code of Federal Regulations (CFR) Part 58

7.1.1.1 Project Information

Responsible Entity: [24 CFR 58.2(a)(7)]	City of Los Angeles Housing Department (LAHD) 1200 West 7th Street, 1st Floor Los Angeles, CA 90017
Certifying Officer Name/Title: [24 CFR 58.2(a)(2)]	Craig Arceneaux, Director of Housing
CEQA Lead Agency:	Housing Authority of the City of Los Angeles (HACLA)
NEPA Lead Agency:	City of Los Angeles Housing Department (LAHD) acting as a Responsible Entity for the United States Department of Housing and Urban Development (HUD)
Responsible Agency:	City of Los Angeles
Project Name:	One San Pedro Specific Plan
Project Location:	The One San Pedro Specific Plan (project) would be constructed on two sites in the community of San Pedro in the southwestern-most portion of the City of Los Angeles. These include the approximately 20-acre One San Pedro Specific Plan Site (OSP Specific Plan Site) and an approximately 0.6-acre site located at 319-327 North Harbor Boulevard (327 Harbor Site). The OSP Specific Plan Site and the 327 Harbor Site are collectively referred to as “the project site.” The OSP Specific Plan Site is located between Santa Cruz Street on the north, Harbor Boulevard on the east, 3rd Street on the south, and Mesa Street on the west. The 327 Harbor Site is located between O’Farrell Street on the north, Harbor Boulevard on the east, commercial uses to the south, and Beacon Street on the west.
Estimated Project Cost:	\$1,120,000,000
Grant Recipient:	Housing Authority of the City of Los Angeles (HACLA) 2600 Wilshire Boulevard Los Angeles, CA 90057
Project Representative:	Jenny Scanlin, Chief Strategic Development Officer
Telephone Number:	213-252-2500

Abstract: The project includes: (1) the phased demolition of the existing Rancho San Pedro public housing complex (Rancho San Pedro) and construction of up to 1,553 residential units, 85,000 square feet (sf) of Neighborhood Serving Uses, and 45,000 sf of commercial retail uses; and (2) the development of 47 residential units on the vacant and undeveloped 327 Harbor Site to serve as replacement housing for existing Rancho San Pedro residents. Rancho San Pedro was constructed in 1942 and added to in 1953 by HACLA as a low-income public housing project. The following project alternatives are analyzed: No Project Alternative ¹, Proposed Project Alternative ², Historic Rehabilitation Alternative, and Partial Preservation Alternative. After the implementation of mitigation, the following environmental impacts were found to be potentially significant and unavoidable: (1) Historic Resources (Proposed Project Alternative and Partial Preservation Alternative), (2) Construction Noise and Vibration (Proposed Project Alternative, Historic Rehabilitation Alternative, and Partial Preservation Alternative), and (3) Operational Noise (Proposed Project Alternative and Partial Preservation Alternative).

Comments regarding this document must be received by: Monday, August 21, 2023 at 5:00 p.m.
You may submit comments to one or both of the following contacts:

- Zoe Kranemann, Development Officer, Housing Authority of the City of Los Angeles, 2600 Wilshire Boulevard, Los Angeles, California 90057 or revitalizersp@hacla.org; and/or
- Jinderpal Bhandal, Environmental Affairs Officer, City of Los Angeles Housing Department, 1200 West 7th Street, 1st Floor, Los Angeles, California 90017 or Jinderpal.Bhandal@lacity.org.

Determination:

☐

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☒

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: _____ Date: _____

Name/Title/Organization: Douglas Guthrie, President and Chief Executive Officer, Housing Authority of the City of Los Angeles

Certifying Officer Signature: _____ Date: _____

Name/Title/Organization: Craig Arceneaux, Director of Housing, City of Los Angeles Housing Department

¹ It is noted that, pursuant to NEPA, federal lead agencies typically refer to the “no build” alternative as the “No Action Alternative” in an EIS. However, this NEPA analysis section of the EIR/EIS uses the term “No Project Alternative” in lieu of the term “No Action Alternative” to retain consistency throughout the EIR/EIS and to avoid potential reader confusion.

² It is noted that, pursuant to the National Environmental Policy Act (NEPA), federal lead agencies typically refer to the proposed development as the “proposed action” in an Environmental Impact Statement (EIS). However, this NEPA analysis section of the EIR/EIS uses the term “proposed project” in lieu of the term “proposed action” for the following reasons: (1) the EIR/EIS is a joint CEQA/NEPA compliance document and Sections 1 through 6 use the term “proposed project” and (2) continued use of the term “proposed project” retains consistency throughout the EIR/EIS to avoid potential reader confusion.

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

7.2 Introduction and Statement of Purpose and Need

The City of Los Angeles Housing Department (LAHD) has prepared this Environmental Impact Statement (EIS) for the One San Pedro Specific Plan (project). On behalf of the Housing Authority of the City of Los Angeles (HACLA), the recipient of United States Department of Housing and Urban Development (HUD) grant funds, LAHD is the “Responsible Entity,” as defined by HUD regulations at 24 Code of Federal Regulations (CFR) Section 58.2(a)(7)(i), for the project.

In accordance with criteria in 40 CFR Section 1501.5(c), HACLA has designated LAHD as the Lead Agency to prepare this EIS for the project in accordance with the National Environmental Policy Act (NEPA; 42 United States Code [USC] Sections 4321 et seq.). This EIS, as required by NEPA, 24 CFR Part 58, and the President’s Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 CFR Parts 1500-1508), analyzes the potential physical, cultural, environmental, and socioeconomic impacts of various alternatives to adopt the OSP Specific Plan and redevelop the existing Rancho San Pedro public housing community (hereafter referred to as “Rancho San Pedro”) to revitalize the project site through the transformation of the community into a mixed-income, mixed-use neighborhood for current and future residents.

7.2.1 Project Site and Vicinity

The project site consists of two locations in the community of San Pedro in the southwestern-most portion of the city of Los Angeles. These include the approximately 20-acre One San Pedro Specific Plan Site (OSP Specific Plan Site) and an approximately 0.6-acre site located at 319-327 North Harbor Boulevard (327 Harbor Site). The OSP Specific Plan Site and the 327 Harbor Site are collectively referred to as “the project site.” The OSP Specific Plan Site is located between Santa Cruz Street on the north, Harbor Boulevard on the east, 3rd Street on the south, and Mesa Street on the west. The 327 Harbor Site is located between O’Farrell Street on the north, Harbor Boulevard on the east, commercial uses to the south, and Beacon Street on the west.

The project site is located on the Palos Verdes Peninsula, approximately 0.5 mile southeast of the southern terminus of State Route (SR-) 110, on the west side of Harbor Boulevard. The project site is located in what is commonly known as the San Pedro community, which includes a number of neighborhoods, mostly comprised of single-family and lower-density multi-family residences originally established to house workers of the adjacent Port of Los Angeles and Port of Long Beach, including within the fishing and other marine-based industries. Commercial uses and marine-related industrial development also border the project site. Within the region, a number of other urbanized cities surround the city of Los Angeles. The 478-square-mile city of Los Angeles is surrounded by the San Gabriel Mountains to the north; the Santa Susana Mountains, Santa Monica Mountains, and Pacific Ocean to the west and south; and the Verdugo Mountains, San Rafael Hills, and San Gabriel Valley to the east.

The reader is referred to Section 2, *Project Description*, and Section 3, *Environmental Setting*, for additional details regarding the project site. Figure 2-1 shows the regional location of the project site and Figure 2-2 shows the project site and surrounding land uses.

7.2.1.1 *Project Overview*

Project Background

The OSP Specific Plan Site is currently developed with Rancho San Pedro, which is one of the oldest public housing developments owned and managed by the Housing Authority of the City of Los Angeles (HACLA) and was initially developed in 1942, with subsequent development in 1953. Rancho San Pedro is considered eligible for listing in the National Register of Historic Places and the California Register of Historic Places, and as a City of Los Angeles (City) Historic Cultural Monument. Existing development on the OSP Specific Plan Site includes 478 public housing units and 8,000 square feet (sf) of amenities, services, and administration land uses, including a management/leasing office, computer center and resident leadership office, social hall, maintenance building, and community room. Existing outdoor amenities include a playground, sports field, grilling area, picnic tables, and a community garden. Within the OSP Specific Plan Site, the City Department of Recreation and Parks owns a 0.41-acre parcel that is used for the community garden and related uses. The OSP Specific Plan Site contains 60 one- and two-story buildings, and the residential unit breakdown currently includes 104 one-bedroom, 255 two-bedroom, 75 three-bedroom, 34 four-bedroom, and 10 five-bedroom units. The reader is referred to Figure 2-3 in Section 2, *Project Description*, for an illustration of the existing uses on the OSP Specific Plan Site. The 327 Harbor Site is an unoccupied, vacant site with no existing improvements, tenants, or on-site operations. The 327 Harbor Site currently consists of ruderal vegetation and two palm trees and is enclosed by a chain-linked fence.

Given the age and condition of the existing public housing units on the OSP Specific Plan Site and the high need for more affordable housing in the city, increased investment interest in the area, and the State designation of the project site as an Opportunity Zone⁵, the proposed project is needed to redevelop Rancho San Pedro to transform the community into a mixed-income, mixed-use neighborhood for current and future residents.

Project Summary

The project includes the development of 47 residential units on the 327 Harbor Site and the adoption of the OSP Specific Plan to guide redevelopment of the OSP Specific Plan Site. The project includes the phased demolition and/or rehabilitation of existing structures on the OSP Specific Plan Site and the construction of up to 1,553 residential units, as well as up to 85,000 sf of Neighborhood Serving Uses and up to 45,000 sf of commercial retail uses on the OSP Specific Plan Site.

The OSP Specific Plan would regulate the OSP Specific Plan Site's permitted land uses, circulation, open space, and development standards and would establish a mix of land uses to create a compact, walkable community that ties together the distinct surrounding neighborhoods. The proposed development at the OSP Specific Plan Site is intended to transition the types and intensities of land uses from the Barton Hill residential neighborhood to the north, to the downtown commercial and civic core of San Pedro to the south, while upgrading and activating the OSP Specific Plan Site. The reader is referred to Section 7.3, *Project Alternatives*, for additional details regarding the project alternatives.

⁵ Opportunity Zones are census tracts defined as an "economically-distressed community where new investments, under certain conditions, may be eligible for preferential tax treatment" (State of California 2022).

7.2.1.2 *Project Purpose, Need, and Objectives*

Purpose

The purpose of the project is to revitalize the project site through the transformation of the community into a mixed-income, mixed-use neighborhood for current and future residents, based on the development guidelines in the OSP Specific Plan. The ability to meet this purpose is measured in terms of the objectives of the project presented in Section 2.6, *Project Objectives and Benefits*, and reiterated below:

- Implement the policies of the City General Plan Framework Element, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the San Pedro Community Plan that encourage growth in urban infill areas to improve mobility options, enhance pedestrian opportunities, and reduce auto dependence.
- Provide a substantial increase in the number of affordable housing units than currently exist at the OSP Specific Plan Site, consistent with the goals of HACLA's 25-Year Vision Plan, the San Pedro Neighborhood Transformation Plan, and the City's Housing Element to expand the supply of affordable housing units in Los Angeles.
- Replace existing, aging affordable housing units on the OSP Specific Plan Site with modernized affordable and moderate housing units in a variety of sizes and configurations to allow for a mix of household sizes, enhanced security and accessibility, and long-term useful life of buildings to minimize the future need for substantial repairs or replacement of the affordable housing.
- Improve the housing stock in the community by demolishing existing buildings which contain lead and asbestos.
- Maximize existing tenants' first right to re-occupy units appropriate to household size, phasing of development, and providing a mix of low- and moderate-income units.
- Incorporate building designs that integrate into the surrounding neighborhoods, take advantage of waterfront views, provide a variety of building types, and integrate new amenities with a focus on developing a healthy and vibrant community.
- Create a mixed-use, mixed-income community that includes a mix of dwelling unit types and sizes, affordability levels, local-serving retail, community services, and active and passive open/green space.
- Implement green design practices to ensure environmental sustainability, including, but not limited to, energy and water efficiency.
- Create new recreation and park facilities that meet the needs and enhance safety of the future residents at the project site and the broader community.

Need for the Project

Rancho San Pedro is seventy to eighty years old, and the structures are reaching their useful life expectancy. The buildings were constructed in a style, form and function typical of public housing developments at that time and suffer from monotonous building design, repetitive building pattern, long street frontages, and lack of through streets. These design deficiencies result in indefensible space and security issues, inadequately sized units, and accessibility issues, among other things. As the Greater Los Angeles region is experiencing a crisis of housing affordability, resulting in over-

crowding conditions and homelessness, there is also the added imperative to use the large publicly owned property to expand affordable housing supply.

In 2015, HACLA, in cooperation with Los Angeles City Council District 15 and the Mayor's Office of Economic Development, commissioned a feasibility study to determine the highest and best use and development potential of the Rancho San Pedro public housing property. The study outlines potential strategies to maximize the value of the property to the public and concludes that replacing and expanding the available housing – both affordable as well as market-rate – would be the highest and best use of the public property with the primary objective to replace the existing affordable housing located at Rancho San Pedro for those currently residing there.

The location, size of the property, and potential redevelopment scale also provides the capacity to layer additional community benefits into redevelopment. These have been identified within the San Pedro Community Plan, as well as by residents of Rancho San Pedro.

The project would thrive as a revitalized, mixed-income neighborhood that builds on its existing assets and creates new, high-quality housing options. Adjacent to the waterfront and downtown, the project would be a model for other revitalization efforts, complete with cultural, community, and economic activity. It would be a safe neighborhood with new parks and recreational opportunities, walking and biking streets, and a variety of housing and supportive service options.

7.2.2 National Environmental Policy Act Review Process

Because a federal agency is funding the project, it must comply with NEPA, and because the project is a “major federal action significantly affecting the quality of the human environment,” an EIS must be prepared.

HUD funding requires compliance with NEPA as stated in HUD's regulations outlined in 24 CFR Part 58, Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities. The project is also subject to the CEQ's Regulations Implementing the Procedural Provisions of NEPA at 40 CFR Parts 1500-1508. HUD has further outlined the project's environmental review requirements in a Federal Register notice published on October 16, 2014 (79 FR 62182).

In accordance with 42 USC 5304(g) and HUD's regulations at 24 CFR Section 58.4, HUD has NEPA authority, with HUD delegating NEPA Lead Agency responsibility to LAHD for the administration of the project, including its environmental review and preparation of this EIS. With LAHD serving as the Lead Agency, this EIS has been prepared in accordance with NEPA, CEQ regulations (40 CFR Parts 1500-1508), and HUD regulations (24 CFR Parts 51, 55, and 58).

An EIS is a public disclosure document that provides full and open disclosure of the potential environmental impacts of a proposed federal action, prior to making any decision to implement the action. This EIS takes an interdisciplinary approach to project evaluation; documents an objective consideration of all reasonable alternatives; identifies mitigation measures³ to avoid or reduce adverse environmental impacts; and provides an avenue for public and agency participation in the decision-making process (40 CFR Section 1502.1).

Following the publication of the Notice of Intent (NOI) to prepare an EIS in the Federal Register and local media outlets, and the conduct of a subsequent 30-day public scoping period (see Section 7.2.8, *Public Participation*), the Draft EIS is the first formal step in documenting the environmental analysis of the project. The Draft EIS describes the project's purpose and need; discusses the alternatives

³ NEPA defines “mitigation” as avoiding, minimizing, rectifying, reducing, or compensating for significant effects of a proposed action (40 CFR Section 1508.20).

development process and the public involvement process; describes the alternatives to be considered in depth within the EIS, including the No Action/Project Alternative (per 40 CFR Section 1502.14[d]); identifies the regulatory requirements applicable to the project; describes the affected natural and built environments; analyzes the potential impacts; and identifies potential mitigation measures that could be implemented to avoid, reduce, or compensate for anticipated adverse impacts.

The Draft EIS is published via a Notice of Availability (NOA) in the Federal Register and local media outlets in accordance with HUD and CEQ regulations. Following the publication of the NOA, there is a 45-day public review and comment period, during which the Draft EIS is made available to the general public for comment (including at a formal public hearing), and circulated to stakeholders, interested parties, and government agencies that have been identified as having particular interest in, or jurisdiction over, the project.

At the conclusion of the 45-day comment period for the Draft EIS, LAHD incorporates substantive public comments into the document and compiles the Final EIS. The Final EIS is circulated in the same manner as the Draft EIS (including the publication of an NOA in the Federal Register and local media outlets) and has a review/comment period of 30 days. At that time, LAHD determines whether a public hearing on the Final EIS is appropriate.

Following completion of the Final EIS comment period, LAHD prepares a Record of Decision (ROD) and Statement of Findings. The ROD summarizes LAHD's decision, identifies the Environmentally Preferable Alternative, selects the alternative that will be implemented, and identifies the potential environmental impacts of that alternative, as well as the mitigation measures that the Government will implement. If additional substantive comments are received during the Final EIS comment period, LAHD addresses these comments in the ROD.

7.2.3 Scope of the Environmental Impact Statement

In accordance with NEPA and CEQ regulations, the EIS focuses on technical resource areas within the project site potentially subject to significant effects. Based on the results of internal and external scoping conducted as part of this NEPA process, the following 15 technical resource areas are evaluated in detail in this EIS: aesthetics/visual quality; air quality; global climate change, greenhouse gas (GHG) emissions, and sea level rise; energy; geology and soils; hazards and hazardous materials; historic resources; land use and planning; noise and vibration; public services; recreation; transportation and circulation; water resources and water quality; utilities and service systems; socioeconomics; and environmental justice. This EIS addresses the direct, indirect, and cumulative effects of the project alternatives on each of these technical resource areas in Sections 7.4.3 through 7.4.18. Additionally, the project alternatives were determined to result in no impact related to airport hazards, coastal barrier resources, floodplain management and flooding, coastal zone, farmlands and agricultural resources, sole source aquifers, federal wetlands and waters of the United States, wild and scenic rivers, unique natural features, federally listed as threatened and endangered species, and vegetation and plant communities, as discussed in Section 7.4.2, *Technical Resource Areas Considered by Eliminated from Further Analysis in the EIS*.

7.2.3.1 Agency Roles and Responsibilities and Decisions to be Made

Required Approvals

The project would require the following actions and approvals:

- Adoption of Master Development Agreement, Disposition and Development Agreements, Ground Leases, and Relocation Plan by HACLA
- NEPA Part 58 compliance necessary for Demolition/Disposition and Rental Assistance Demonstration (RAD) Conversion of the existing Rancho San Pedro development from HUD and potential federal funding for the project
- Certification of the EIR/EIS by HACLA Board of Directors and publication of the Record of Decision in the Federal Register by HUD
- Adoption of the OSP Specific Plan, General Plan Amendments, Amendment of the Community Plan Implementation Overlay District (CPIO) boundaries, and Zone and Height District change by the City of Los Angeles
- Adoption of a Phased Vesting Tentative Tract Map (VTTM) by the City of Los Angeles. The Phased VTTM is consistent with applicable regulations within the OSP Specific Plan. The Phased VTTM consists of nine ground lots and a Final Map will be filed for each subsequent development phase.
- Haul Route Approval from the Los Angeles Department of Building and Safety
- Permit for removal of street trees

Agency Roles and Responsibilities

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, demolition of structure and landscaping including street trees, temporary street closure permits, grading permits, Haul Route permits, excavation permits, foundation permits, building permits, and sign permits to execute and implement the project.

HACLA is seeking federal funds from the following HUD sources:

- Community Development Block Grant (CDBG) Program
- Section 8 Project Based Vouchers
- Choice Neighborhood Initiative Planning Grants
- HOME Investment Partnerships Program (HOME)

LAHD, on behalf of HUD, is the NEPA Lead Agency and decision-maker concerning the project in accordance with 42 USC Section 5304(g) and HUD regulations at 24 CFR Part 58. LAHD is the Responsible Entity for completing the Environmental Review through a Memorandum of Agreement (MOA) with HUD. HUD is the Certifying Officer for the ROD and HUD Release of Funds.

LAHD is responsible for all decisions regarding the development and analysis of the project, including which alternatives are analyzed in this EIS, which alternative is found to be the Environmentally Preferable Alternative, which alternative is selected for implementation (as identified in the ROD), and which mitigation measures would be implemented. LAHD will codify its decision-making concerning the project in the ROD, based on the analysis in this EIS.

LAHD is also working closely with a number of other federal, State, and local agencies throughout this NEPA process. Pursuant to 40 CFR Section 1508.1(e), a Cooperating Agency is “any federal agency (and a State, tribal, or local agency with agreement of the Lead Agency) other than a Lead Agency that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major federal action that may significantly affect the quality of the human environment.” During the public scoping period, LAHD invited several federal, State, tribal, and local agencies with potential jurisdiction over the project to

participate in the NEPA process. Of the notified agencies, three provided written comments to the NOI and are considered to be Participating Agencies. Pursuant to 40 CFR Section 1508.1(w), a Participating Agency under NEPA is defined as “a federal, State, tribal, or local agency participating in an environmental review or authorization of an action.” Therefore, HACLA, the City of Los Angeles, and SCAQMD are considered Cooperating Agencies under NEPA; however, it is noted that HACLA, the City of Los Angeles, and SCAQMD will rely on the impact analysis in Section 4, *Environmental Impact Analysis*, which was conducted in accordance with the California Environmental Quality Act (CEQA). Additionally, the following agencies are Participating Agencies for the project under NEPA:

- United States Environmental Protection Agency (U.S. EPA), Region 9
- California Department of Transportation, District 7
- Native American Heritage Commission

Additionally, pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, LAHD must consider the potential effects of the project on any historic properties. In 1995, the City of Los Angeles executed a Programmatic Agreement among the City of Los Angeles, the California State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation (ACHP) regarding historic properties affected by use of Community Development Block Grants; Rental Rehabilitation Block Grants; McKinney Act Homeless Programs, including the Emergency Shelter Programs Transitional Housing, Permanent Housing for the Homeless Handicapped, and Supplemental Assistance or Facilities to Assist the Homeless; the Hope II Programs; the Home Programs; the Housing Opportunities for Persons with AIDS Program; and the Shelter Plus Care Program.

The Programmatic Agreement is applicable to undertakings assisted in whole or in part by revenues from the HUD programs listed above. The review process established by the Programmatic Agreement must be completed prior to City of Los Angeles final approval of an application for assistance under these programs and prior to the City of Los Angeles or the property owner altering the property or initiating or making an irrevocable commitment for construction that may affect a property that is 50 years of age or older. Any undertaking that does not qualify for review under the terms of the Programmatic Agreement must be reviewed pursuant to the procedures outlined in 36 CFR Part 800.

LAHD and HACLA initiated the Section 106 consultation process with SHPO via a letter on September 9, 2021. On August 31, 2022, a meeting was held to provide SHPO with an update on the project. During the meeting, a project status update was provided, and attendees discussed the appropriate path forward for the undertaking in terms of Section 106 consultation and the necessity for a Section 106 agreement document to support the resolution of adverse effects for the project. At the meeting, SHPO also indicated that a Programmatic Agreement was the appropriate document within which to resolve adverse effects for the project. On September 27, 2021, LAHD received an email from SHPO providing concurrence on the area of potential effects (APE) and survey identification methodology. LAHD subsequently provided SHPO with the Draft One San Pedro Specific Plan Supplemental Cultural Resources Survey Report and Effects Analysis (Rincon Consultants, Inc. [Rincon] 2023a), Draft One San Pedro Specific Plan – 327 Harbor Site Extended Phase I/Phase II Cultural Resources Assessment (Rincon 2023b), and Draft Programmatic Agreement between LAHD and SHPO regarding the One San Pedro Specific Plan Project in the City of Los Angeles, Los Angeles County, California for review in June 2023, and are included in Appendix C. SHPO is currently reviewing the draft cultural reports. It is noted that the Final EIS cannot be released for public review and the

ROD cannot be issued without receipt of SHPO concurrence. The Final EIS will include a discussion of concurrence from SHPO.

Copies of the letters sent to each agency invited to participate in the NEPA scoping process, as well as copies of the responses to the NOI from the U.S. EPA and California Department of Transportation, are included in Appendix A.

7.2.4 Consultation with Native American Tribes

As per the Section 106 Programmatic Agreement, and pursuant to 40 CFR Section 1501.7(a)(1), the NHPA, and the Native American Graves Protection and Repatriation Act (NAGPRA), LAHD is consulting with Native American tribes potentially having ancestral ties to the project area. Tribes were invited to participate in the NEPA and NHPA Section 106 processes as Sovereign Nations per Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments).

In September 2021, LAHD sent letters to the 10 Native American contacts identified by the Native American Heritage Commission (NAHC). The letters included a project description and map and requested that tribal contacts respond if they have knowledge regarding cultural resources or traditional cultural properties within or near the APE. Follow up via telephone and email was conducted in early November 2021. Due to the development and refinement of the project description, LAHD sent the same 10 Native American contacts new letters with revised project information on August 18, 2022, with a request for response if the contact have knowledge regarding cultural resources or traditional cultural properties within or near the APE. Follow up via telephone and email was conducted in September and October 2022. The 10 Native American contacts who were notified of the project pursuant to NHPA Section 106 include:

- Fernandeno Tataviam Band of Mission Indians – Rudy Ortega, Tribal President
- Fernandeno Tataviam Band of Mission Indians – Jairo Avila, Tribal Historic and Cultural Preservation Officer
- Gabrieleno Band of Mission Indians – Kizh Nation – Andrew Salas, Chairperson
- Gabrielino/Tongva San Gabriel Band of Mission Indians – Anthony Morales, Chairperson
- Gabrielino/Tongva Nation – Sandonne Goad, Chairperson
- Gabrielino Tongva Indians of California Tribal Council – Robert F. Dorame, Chairperson
- Gabrielino-Tongva Tribe – Charles Alvarez, Chairperson
- San Fernando Band of Mission Indians – Donna Yocum, Chairperson
- Soboba Band of Luiseño Indians – Scott Cozart, Chairperson
- Torres Martinez Desert Cahuilla Indians – Thomas Tortez, Chairperson

The following bullet list summarizes the results of Native American Section 106 consultation conducted as part of the NHPA Section 106 process:

- On September 13, 2021, Jairo Avila, Tribal Historic and Cultural Preservation Officer for the Fernandeno Tataviam Band of Mission Indians, responded via email and deferred to local tribal groups. No additional response was received.
- On November 12, 2021, a voicemail was received from Andrew Salas, Chairperson for the Gabrieleno Band of Mission Indians – Kizh Nation. Chairperson Salas requested the contact information of the project's lead agency and stated that the Gabrieleno Band of Mission Indians – Kizh Nation would like to engage in formal Section 106 consultation. Consultation with

the Gabrieleño Band of Mission Indians – Kizh Nation in 2021 occurred jointly under California Assembly Bill (AB) 52. A consultation meeting was held on June 23, 2021 with the Gabrieleño Band of Mission Indians – Kizh Nation. During the consultation meeting, Chairperson Salas requested copies of the cultural records search results and the geotechnical study prepared in support of the project. Chairperson Salas also emailed Rincon several files, including various ethnographic maps and several other non-project specific letters that explain regulatory information and generic cultural resources sensitivity. The cultural records search results and the geotechnical study were sent to Chairperson Salas on March 1, 2022. Chairperson Salas requested a Native American monitor be retained prior to commencement of ground-disturbing activities and provided procedures to follow in the event of a discovery of tribal cultural resources, human remains or grave goods.

On September 19, 2022, in response to an updated consultation letter for the 327 Harbor Site, Chairperson Salas stated that the Gabrieleño Band of Mission Indians – Kizh Nation would like to engage in formal Section 106 consultation. On September 20, 2022, the administrative assistant for the tribe requested that Rincon provide the lead agency's contact information to set up a consultation meeting. On April 20, 2023, an additional consultation meeting with the Gabrieleño Band of Mission Indians – Kizh Nation occurred.

On May 25, 2023, HACLA provided a follow-up letter to the Tribe that included a summary of the consultation efforts to date and the final mitigation measures for the project. The final tribal cultural resource mitigation measures were separated for each of the consulting tribes based on recommendations received from the Gabrieleño Band of Mission Indians – Kizh Nation during the consultation period. On May 25, 2023, the Gabrieleño Band of Mission Indians – Kizh Nation responded to HACLA's letter and stated that the Tribe disagrees with the final mitigation measures and provided a copy of the Tribe's requested mitigation measures that were previously provided on April 13, 2023.

On June 5, 2023, HACLA provided a follow up letter to the Tribe. The letter summarized the consultation efforts and stated that based on the interest of multiple tribes with regard to the project, HACLA will be moving forward with the final mitigation measures provided on May 25, 2023, to remain inclusive of all consulting Native American tribes. HACLA thanked the Tribe for their valuable input and consultation on the project. The letter signified the conclusion of Section 106 consultation with the Gabrieleño Band of Mission Indians – Kizh Nation. It is noted that the Final EIS cannot be released for public review and the ROD cannot be issued without receipt of SHPO concurrence. The Final EIS will include a discussion of concurrence under Section 106 from the Gabrieleño Band of Mission Indians – Kizh Nation.

- During a telephone call on November 12, 2021, Robert Dorame, Chairperson for the Gabrielino Tongva Indians of California Tribal Council identified the project area as being highly sensitive with three main villages in the adjacent area in addition to one on Dead Man's Island. Chairperson Dorame stated there are some initial documents that LAHD and HALCA can expect from Christina Connelly. Ms. Connelly sent the documents on November 12, 2021. No additional requests were made and consultation with the Gabrielino Tongva Indians of California Tribal Council was concluded. On October 27, 2022, in response to an updated consultation letter for the 327 Harbor Site, Chairperson Dorame stated that the Gabrielino Tongva Indians of California Tribal Council would like to engage in formal Section 106 consultation and requested a meeting with the lead agency. A consultation meeting was held virtually on October 31, 2022. During the consultation meeting, Chairperson Dorame provided a history of the San Pedro area and the APE's archaeological sensitivity due to its location to known village sites. The village area of impact is *Xujunga*, sometimes spelled *Xuxungna*, known as the designated village, where the chief made

tribal decisions for other villages in the region. Chairperson Dorame recommended archaeological and Native American monitoring during ground-disturbing activities associated with the project. Chairperson Dorame further stated that the APE was properly investigated for cultural resources and supported the recommendations for the project.

Copies of the consultation letters sent to these tribes and the responses received are included in the appendices of the project-specific Supplemental Cultural Resources Survey Report and Effects Analysis (Appendix C). No other responses have been received to date. Consultation will be ongoing with these tribes throughout the NEPA and NHPA Section 106 processes.

7.2.4.1 Public Participation

It is vital that those who are interested in, potentially affected by, and/or have regulatory jurisdiction over the project have an opportunity to share their concerns and provide input into the EIS and the overall NEPA process. As such, and pursuant to 40 CFR Section 1506.6, LAHD has worked diligently to involve and inform the public about the project and the ongoing NEPA process.

Public Scoping Meetings

Three virtual scoping meetings were held for the project: one on February 6, 2021, from 10:00 a.m. to 12:00 p.m.; one on April 27, 2021, from 4:30 p.m. to 6:30 p.m.; and one on May 11, 2021, from 5:30 p.m. to 7:00 p.m. All public scoping meetings were held in English and Spanish. The meetings allowed interested individuals, groups, and public agencies an opportunity to provide written and oral comments regarding the scope and focus of the Environmental Impact Report (EIR)/EIS. The public scoping meetings were noticed in the NOI, on HACLA's website, in the Daily Breeze (local newspaper), and through the City of Los Angeles 15th Council District weekly newsletter.

NOI Publication and Public Scoping Period

Pursuant to 24 CFR Section 58.55, the NOI was published in the Federal Register (Vol. 86, No. 63) on April 9, 2021 for a 30-day review period that ended on May 10, 2021. The purpose of the NOI was to formally convey that LAHD are preparing an EIS for the project and to solicit comments from agencies and the public regarding the scope and content of the environmental information to be included in the EIS. Comments received in response to the NOI and scoping meetings have been taken into consideration in the preparation of the EIS. Copies of the NOI are provided in Appendix A of this EIR/EIS. Additionally, it is noted that the Notice of Preparation (NOP) for the EIR was circulated on January 13, 2021 for a 30-day review period that ended on February 12, 2021, pursuant to the noticing requirements for CEQA compliance.

Public Review and Comment of the Draft EIS

This Draft EIS is made available for public review and comment. Per 40 CFR Section 1506.10, the public comment period was initiated with the U.S. EPA's publication of the NOA of the Draft EIS in the Federal Register on Friday, June 23, 2023, and will be concluded after 61 days on Monday, August 21, 2023. During this time, the Draft EIS was made available to the public in multiple ways:

- On HUD's website: www.hudexchange.info/programs/environmental-review/environmental-impact-statements
- On HACLA's website: <https://www.hacla.org/en/about-us/public-documents>
- On LAHD's website: <https://housing.lacity.org/partners/nepa-review>

- In printed copies at the following locations:
 - Rancho San Pedro Property Management Office: 275 West 1st Street, San Pedro, California 90731 (open Monday through Friday 8:30 a.m. to 4:00 p.m., except federal holidays)
 - San Pedro Regional Branch Library: 931 South Gaffey Street, San Pedro, California 90731 (open Monday through Thursday 10:00 a.m. to 8:00 p.m., Friday and Saturday 9:30 a.m. to 5:30 p.m., and Saturday 1:00 p.m. to 5:00 p.m., except federal holidays)
 - City of Los Angeles Council District 15 – San Pedro Office: 638 South Beacon Street, Room 552, San Pedro, California 90731 (open Monday through Friday 9:00 a.m. to 5:00 p.m., except federal holidays)
 - Housing Authority of the City of Los Angeles: 2600 Wilshire Boulevard, Los Angeles, California 90057 (open Monday through Friday 8:00 a.m. to 4:00 p.m., except federal holidays)
 - City of Los Angeles Housing Department, 1200 West 7th Street, 8th Floor, Los Angeles, California 90017 (open Monday through Friday 8:30 a.m. to 4:30 p.m., except federal holidays)

For individuals with sensory disabilities, this document can be made available in Braille, in large print, on audiocassette, or on computer disk. To obtain a copy in one of these alternate formats, please call or write to:

- Zoe Kranemann, Development Officer, Housing Authority of the City of Los Angeles, 2600 Wilshire Boulevard, Los Angeles, California 90057, revitalizersp@hacla.org, 213-252-3170; and/or
- Jinderpal Bhandal, Environmental Affairs Officer, City of Los Angeles Housing Department, 1200 West 7th Street, 1st Floor, Los Angeles, California 90017, Jinderpal.Bhandal@lacity.org, 213-808-8558.

The Cooperating Agencies, as well as all agencies, organizations, and individuals that received the NOI, were sent the NOA of the Draft EIS, which includes the location where the Draft EIS can be reviewed.

Additionally, a public meeting will be held on June 28, 2023 at 7:00 p.m. at the Port of Los Angeles Boys & Girls Club: 100 West 5th Street, San Pedro, California 90731.

Comments on the Draft EIS will be accepted were accepted in any of the following ways:

1. Either orally or in writing at the public meeting
2. Emailed to Zoe Kranemann, Development Officer at HACLA at revitalizersp@hacla.org
3. Mailed to Zoe Kranemann, Development Officer, Housing Authority of the City of Los Angeles, 2600 Wilshire Boulevard, Los Angeles, California 90057
4. Emailed to Jinderpal Bhandal, Environmental Affairs Officer at LAHD at Jinderpal.Bhandal@lacity.org
5. Mailed to Jinderpal Bhandal, Environmental Affairs Officer, City of Los Angeles Housing Department, 1200 West 7th Street, 1st Floor, Los Angeles, California 90017

Comments on the Draft EIR/EIS must be received by 5:00 p.m. on Monday, August 21, 2023 to be considered. Mailed in comments must be postmarked by Monday, August 21, 2023 to be considered. Following the public comment period, responses will be prepared, and changes will be made to the Final EIS, as appropriate.

mitigation measures. The structure and content of this document have been developed in accordance with NEPA requirements. The main organization of this document is as follows:

Section 7.1, Cover Sheet: Provides a summarization of the project and project location, as well as the responsible agencies and the determination that the project would result in potentially significant impacts.

Section 7.2, Introduction and Statement of Purpose and Need: Describes the project's background; the project site; the purpose, need, and objectives of the project; the NEPA process and regulatory framework; the scope of the EIS; the roles and responsibilities of agencies and Native American tribes in the NEPA process; public participation efforts conducted; and the organization of the EIS.

Section 7.3, Project Alternatives: Presents a detailed description of the project alternatives, including the No Project Alternative, the Proposed Project Alternative, and the two other build alternatives, and uses a comparison table to preview the analysis presented in Section 7.4. Section 7.3 also describes alternatives that were dismissed from further consideration in accordance with 40 CFR Section 1502.14.

Section 7.4, Affected Environment and Environmental Consequences: Organized by the 16 technical resource areas that are analyzed in detail for potential impacts in this EIS. Each discussion outlines the affected environment, applicable regulatory setting, and thresholds of significance and the methodology for impact analysis. This section also describes the potential physical, cultural, environmental, and socioeconomic impacts (direct, indirect, and cumulative) of each considered alternative of the project, including the No Project Alternative. This section also identifies potential mitigation measures that could be implemented to avoid or reduce adverse impacts.

Section 7.5, Other Required Disclosures: Discusses the relationship between short-term uses of the environment and potential long-term productivity of the project; the irreversible and irretrievable commitments of resources associated with implementation of the project; and the potentially significant and unavoidable adverse impacts of the project alternatives.

Section 7.6, List of Preparers: Lists all individuals involved in the preparation of this EIS.

Section 7.7, List of Stakeholder: Lists all stakeholders involved in the preparation of this EIS.

Section 7.8, References: Provides a bibliography of all sources cited in this EIS.

7.3 Project Alternatives

7.3.1 Introduction

The project involves the redevelopment of Rancho San Pedro to revitalize the project site through the transformation of the community into a mixed-income, mixed-use neighborhood for current and future residents.

LAHD has identified the following three project build alternatives:

- Proposed Project Alternative
- Historic Rehabilitation Alternative
- Partial Preservation Alternative

After an extensive alternatives development and evaluation process, the three project build alternatives were determined to be the only feasible alternatives that would meet the purpose of and need for the project, as described in Section 7.2.3, *Project Purpose, Need, and Objectives*.

In developing the project build alternatives, other alternatives were initially considered but ultimately eliminated from consideration during the planning stages of the project. Those alternatives and the rationales for their elimination are outlined in Section 7.3.2, *Alternatives Considered but Eliminated from Further Consideration*. In addition to the three project build alternatives and in accordance with 40 CFR Section 1502.14(d), LAHD also fully analyzed the No Project Alternative as documented in this EIS. A full description of each project alternative is provided in Section 7.3.3, *Alternatives Carried Forward for Evaluation in this EIS*. LAHD has identified the Proposed Project Alternative as the Preferred Alternative for implementation.

7.3.1.1 *Alternatives Considered but Eliminated from Further Consideration*

As discussed in Section 6.2, *Alternatives Considered but Rejected*, during the development of the project build alternatives, three alternatives were considered but eliminated from further consideration. These alternatives and the reasons they were eliminated from further consideration are described below.

Reduced Density Alternative

Under the Reduced Density Alternative, the residential, Neighborhood Serving, and commercial uses of the Proposed Project Alternative would be reduced by 50 percent. Such an alternative would consist of 42,500 sf of Neighborhood Serving Uses, 22,500 sf of commercial retail, and 777 residential units on the OSP Specific Plan Site. On the 327 Harbor Site, residential development would be reduced to 24 units. Building heights and parking supply would be reduced proportionately for the reduction in development. Private and common open space would be reduced proportionately for the reduction in residential units and would comply with the requirements set forth in the OSP Specific Plan. The amount, location, and types of publicly accessible open space and recreational programming would be consistent with the proposed project, and would include the Palos Verdes Linear Park, Centre Street Park, Harbor Plaza, Paseo Plazas, and Youth Sports Field. Existing uses on the OSP Specific Plan Site would still be demolished in phases to accommodate the proposed uses and the construction activities on the project site would be similar, with slightly reduced building construction durations due to the reduced density.

The Reduced Density Alternative would not reduce potentially significant impacts to historical resources on the OSP Specific Plan site, nor would it reduce potentially significant construction or operational noise impacts across the project site to a level of less than significant. The phased demolition of the existing Rancho San Pedro complex would result in potentially significant and unavoidable impacts to historical resources. Additionally, demolition of the existing uses, grading, building construction, and paving activities for the Reduced Density Alternative would require the same equipment as the project build alternatives carried forward for evaluation in this EIS, including backhoes, excavators, loaders, and surfacing equipment. Such equipment would be necessary to demolish the existing development, grade the project site, and haul away debris. Given the project site's proximity to nearby sensitive uses, even with implementation of mitigation measures for noise and a shorter construction period of approximately nine years, the daily levels of construction noise would be similar to that described in Section 7.4.11, *Noise and Vibration*, for the Proposed Project Alternative. Likewise, development of new public open space uses that may include events with

amplified sound, such as sports games and live music, would result in similar operational noise impacts as the Proposed Project Alternative. Thus, the Reduced Density Alternative would not eliminate or reduce potentially significant and unavoidable impacts related to historical resources and construction and operational noise.

Reduced Daily Construction Hours Alternative

The Reduced Daily Construction Hours Alternative would involve the same buildings and amenities as the Proposed Project Alternative but would limit daily construction hours to reduce construction noise. The intent of this alternative is to reduce potential impacts associated with construction noise by limiting the loudest construction activities during the most noise-sensitive hours of the day, such as early mornings and evenings. Heavy-duty and particularly noisy equipment (e.g., backhoes, loaders, jackhammers, etc.) would be prohibited from operating before 8:00 a.m. and after 4:00 p.m. on weekdays and before 9:00 a.m. and after 4:00 p.m. on Saturdays. Similar to the Proposed Project Alternative, no construction would occur on Sundays and federal holidays. As a comparison, Los Angeles Municipal Code (LAMC) Section 41.40 allows all construction equipment to be used from 7:00 a.m. to 9:00 p.m. on weekdays and from 8:00 a.m. to 6:00 p.m. on Saturdays. The Reduced Daily Construction Hours Alternative would result in a longer overall construction period due to the reduced daily construction hours. Given the project site's proximity to nearby sensitive uses, even with implementation of noise mitigation measures and reduced construction hours, the daily levels of construction noise would be similar to that described in Section 7.4.11, *Noise and Vibration*, for the Proposed Project Alternative. Likewise, development of new public open space uses that may include events with amplified sound, such as sports games and live music, would result in similar operational noise impacts as the proposed project. Thus, the Reduced Daily Construction Hours Alternative would not eliminate or reduce significant and unavoidable impacts related to construction and operational noise, nor would this alternative eliminate or reduce significant and unavoidable impacts to historical resources or associated with construction vibration.

Alternative Site Location

Although not required under NEPA, CEQA requires EIRs (for projects within California) to consider alternative site locations for projects. According to the CEQA Guidelines, selecting another location for the project should be considered if doing so would allow significant impacts of the project to be avoided or substantially lessened. If no feasible alternative locations exist, an EIR must disclose the reasons for this conclusion. This alternative was initially considered but eliminated from further consideration due to infeasibility. The OSP Specific Plan Site has been identified in the San Pedro Community Plan as distressed, under-utilized, and an opportunity area for redevelopment (City of Los Angeles 2017). Similarly, the General Plan Housing Element identifies the OSP Specific Plan Site as a "pipeline development" for additional housing units (City of Los Angeles 2021a). Therefore, the project site has already been identified in City planning documents for redevelopment. Additionally, this alternative was deemed infeasible as HACLA does not own or control another site of comparable size that could accommodate the proposed uses and project objectives. Also, it is not feasible for HACLA to obtain control of another site that would help meet the project objectives because there is no identified funding source that could be used to purchase another site, even if one were available. Furthermore, this alternative would not meet the purpose of and need for the project.

7.3.1.2 *Alternatives Carried Forward for Evaluation in this EIS*

LAHD identified three project build alternatives that meet the purpose of and need for the project, including the majority of the project's objectives (see Section 7.2.3, *Project Purpose, Need, and Objectives*). A description of the project alternatives considered to meet the purpose of and need for the project is presented in the following subsections. LAHD has identified the Proposed Project Alternative as the Preferred Alternative for implementation.

While the No Project Alternative would not satisfy the purpose of or need for the project, this alternative is carried forward to provide a comparative baseline against which to analyze the effects of the project, pursuant to NEPA and CEQ Regulations (40 CFR Part 1502.14[d]). The No Project Alternative reflects both a continuation of the status quo, as well as projected future conditions, and serves as a benchmark against which the effects of the project can be evaluated.

No Project Alternative

As discussed in Section 6.5.1, the No Project Alternative assumes that the project would not be approved, no new permanent development would occur within the project site, and the existing conditions, as described in Section 2.4, *Existing Site Characteristics*, and Section 3, *Environmental Setting*, would be maintained. However, HACLA would continue to maintain the site in accordance with its standard practices and policies. Residential unit renovations would continue to occur over the long term as units become vacant and turn over. Thus, the physical conditions of the project site would generally remain the same as existing conditions. Specifically, the existing Rancho San Pedro housing complex would remain on the OSP Specific Plan Site, and the 327 Harbor Site would remain vacant and undeveloped. No new development would occur under the No Project Alternative.

Proposed Project Alternative

As discussed in Section 2.5, the Proposed Project Alternative involves the development and occupation of 47 residential units on the 327 Harbor Site and the adoption of the OSP Specific Plan to guide redevelopment of the OSP Specific Plan Site.

On the OSP Specific Plan Site, the Proposed Project Alternative would include the phased demolition of the existing 478-unit Rancho San Pedro housing complex and development of a total of up to 1,553 multi-family residential units for mixed-income households, 85,000 sf of Neighborhood Serving Uses, and 45,000 sf of commercial/retail uses. Neighborhood Serving Uses include, but are not limited to, a property management office, community rooms, social service offices, social hall, workforce development office, health clinic, wellness center, business incubator, nonprofit offices, and municipal offices. Neighborhood Serving Uses also include small-scale retail not exceeding 3,000 sf that would provide goods and services to future residents to meet typical needs, such as dry cleaners, flower shops, small convenience stores, and bakeries. The 45,000-sf commercial retail component of the Proposed Project Alternative would include businesses larger than 3,000 sf such as restaurants, grocery stores, and pharmacies. In addition, 5.3 acres of publicly accessible parks would be developed. Each building would have its own on-site parking garage with secured access limited to residents. In addition to secured parking garages, on-street parking within and around the site would also be maximized for guests and customers, including expanding available diagonal parking where available. This would include reconfiguring on-street curb parking, transitioning from parallel to diagonal parking on some blocks. The Proposed Project Alternative would maintain the existing street grid and block configuration, with the exception of Beacon Street and the intersecting portion of 2nd Street, where a new pedestrian plaza is proposed.

On the 327 Harbor Site, a 47-unit residential building with ground floor parking would be constructed, and would serve as replacement units for existing residences on the OSP Specific Plan Site.

Development of the Proposed Project Alternative would occur in multiple stages. Construction would start at the 327 Harbor Site, which take approximately two years to construct. Construction of the OSP Specific Plan Site would occur in phases over a 14- to 20-year period. Initial construction stages on the OSP Specific Plan Site would focus on providing replacement housing units for existing residents, with the later phases dedicated to expansion of affordable units, homeownership units, community amenities, and services. The proposed phasing would be planned to minimize disturbance to current residents.

Construction of the 327 Harbor Site project component is anticipated to commence in 2023, with completion in 2025, and construction of the OSP Specific Plan is anticipated to occur over three Phases spanning approximately 14 to 20 years. For the purposes of a conservative analysis, it is anticipated construction activities on the OSP Specific Plan Site would commence in 2024 and end in 2037.

The Proposed Project Alternative would involve the phased demolition of existing structures on the OSP Specific Plan Site and the construction of up to 1,553 residential units, 45,000 sf of commercial and retail uses, and 85,000 sf of Neighborhood Serving Uses. The 327 Harbor Site would be developed with 47 residential units to serve as replacement housing for current Rancho San Pedro residents during construction on the OSP Specific Plan Site. The Proposed Project Alternative includes two development scenarios (see Section 2.5) that would involve phasing construction on the OSP Specific Plan Site in different ways. Under Scenario A, the densest development would be located in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2.

The reader is referred to Section 2.5 for a detailed description of the Proposed Project Alternative, including the green building features incorporated into the Proposed Project Alternative. Specifically, Tables 2-2 and 2-6 provide a summary of the characteristics of the Proposed Project Alternative at the 327 Harbor Site and the OSP Specific Plan Site, respectively, and Figures 2-4 through 2-17 provide conceptual designs related to the Proposed Project Alternative.

Additionally, the Proposed Project Alternative would incorporate the following Project Design Features (PDFs):

PDF AES-1 Anti-reflective Glass

The OSP Specific Plan includes a requirement that glass used in building façades be low-reflective or treated with an anti-reflective coating to minimize glare. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted. This requirement will also apply to development on the 327 Harbor Site.

PDF AES-2 Outdoor Lighting

As required by the OSP Specific Plan, all new outdoor lighting required for the project will be shielded and directed towards the interior of the project site such that the light source does not project directly upon any adjacent property, while maintaining adequate lighting levels for public safety and security. This requirement will also apply to development on the 327 Harbor Site.

PDF AES-3 Mechanical Equipment and Utility Screening

As required by the OSP Specific Plan, mechanical, electrical, and roof top equipment (including heating, ventilation, and air conditioning [HVAC] systems), as well as building appurtenances and trash enclosures, will be integrated into the project's architectural design and screened from view. This requirement will also apply to development on the 327 Harbor Site.

PDF GHG-1 Photovoltaic Solar

Active photovoltaic (PV) solar will be installed to produce a minimum rate of 15 percent electricity demand for either Scenario⁴.

PDF GHG-2 EV Charging Stations

The proposed project will comply with Tier II voluntary Title 24 measures which require that a total of 40 percent of parking spaces are electric vehicle (EV) ready and a minimum of 15 percent of parking spaces are equipped with EV chargers⁵. Consistent with these requirements, a minimum of 855 spaces would be EV ready and EV charging stations would be incorporated on site to accommodate a minimum of 321 spaces for Scenario A and B (15 percent of total parking spaces).⁶ In addition to the added EV charging stations, electric outlets for use by delivery vehicles in loading areas shall be incorporated where feasible.

PDF GHG-3 Additional Measures

The following Transportation Demand Management (TDM) measures will be incorporated into the proposed project, as outlined in the Transportation Assessment (Fehr & Peers 2023)⁷:

- Construction of a mobility hub at 1st Street
- Implement/improve on-street bicycle facilities

⁴ Under the Proposed Project Alternative, 15 percent reduction in CO₂e emissions (respectively) from PV solar offsets would result in a reduction of 156 MT of CO₂e annually for Scenario A and 165 MT of CO₂e annually for Scenario B.

⁵ EV-ready = a vehicle space which is provided with a branch circuit and any necessary raceways to accommodate EV charging stations, including a receptacle for future installation of a charger (see California Green Building Standard Code, Title 24 Part 11 for full explanation of mandatory measures, including exceptions).

⁶ The inclusion of 321 EV charging spaces under the Proposed Project Alternative, would result in a reduction of 6,013 metric tons (MT) of carbon dioxide equivalent (CO₂e) annually for Scenario A and 6,035 MT of CO₂e annually for Scenario B. The difference is based on anticipated CO₂e intensity factors for the various years and the years of implementation of the charging stations based on the timing of residential development by phases. Electric use by delivery vehicles is not quantified as this portion of the measure is not specific enough to provide the detail needed to model emissions reductions.

⁷ Implementation of these measures will reduce annual VMT under the Proposed Project Alternative, by 718,320. This will reduce greenhouse gas (GHG) emissions from the Proposed Project Alternative by approximately 206 MT of CO₂e.

- Include bicycle parking per the LAMC
- Include secure bike parking and showers (end of trip facilities)
- Improve pedestrian network within the project site;
- Use of transit subsidies assuming that 7 percent of employees and residents are eligible and a daily equivalent of \$5.96 is subsidized;
- Implementation of a car-share program; and
- A comprehensive bicycle-share program for the development

PDF POL-1 Construction Security

During construction on the OSP Specific Plan site and the 327 Harbor Site, the Applicant will implement temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular private security patrols during non-construction hours will be provided.

PDF POL-2 Safety Lighting

As required by OSP Specific Plan, the project will provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The project will also provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. This requirement will also apply to development on the 327 Harbor Site.

PDF POL-3 Operational Security

The project will provide a security program to ensure the safety of residents, employees, and other visitors to the project site. The project will incorporate strategies in design and planning, as well as active security features. On-site security measures during project operation would include:

- Provide on-site security personnel whose duties shall include, but not be limited to, the following:
 - Monitoring entrances and exits;
 - Patrol the perimeter of the property;
 - Control and monitor activities in the public spaces and private outdoor areas;
 - Managing and monitoring fire/life/safety systems; and
 - Controlling and monitoring activities in the parking facilities.
- Install security industry standard security lighting at recommended locations, including parking areas, pedestrian pathways, and alleys.
- Install closed-circuit television at select locations, including, but not limited to, entry and exit points, lobby areas, outdoor open spaces, and parking areas.
- Provide adequate lighting of parking areas, elevators, and lobbies to reduce areas of concealment.
- Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking areas and access points.
- Prominently display throughout the project site the contact information for on-site security staff.

This PDF will also apply to the 327 Harbor Site.

PDF LIB-1 Universal Wi-Fi

The proposed project would include free, publicly accessible Wi-Fi in the residential common areas and publicly accessible open space areas of the OSP Specific Plan Site. This PDF also applies to the 327 Harbor Site.

PDF REC-1 Recreational Programming

Programming for the proposed parks will include the following:

- **Palos Verdes Linear Park:** The park will include a variety of playgrounds serving different ages and physical abilities, a picnic area, and an open field. Other potential amenities could include a skate park, dog park, and bandshell, determined through future community engagement.
- **Centre Street Park:** The park will include both indoor and outdoor space amenities to provide opportunities for art, education, sports, and exercise.
- **Harbor Plaza:** Flexible seating will be provided within the space for the public. The plaza will also be designed to host a variety of informal and programmed activities, including, but not limited to, live entertainment, outdoor games, and other community programming.
- **Paseo Plazas:** These spaces will serve as gateways into the project site as an extension of the downtown San Pedro area, and would be intended to host dynamic public art. The paseos will include art such as climbable sculptures, outdoor galleries with rotating exhibits, kiosks for selling or creating art, and art walls.

PDF T-1 Construction Management Plan

Prior to the start of construction, a Construction Management Plan will be prepared and submitted to the Los Angeles Department of Transportation (LADOT) for review and approval in accordance with the time frames set forth in Executive Directive 1. The Construction Management Plan will include a Worksite Traffic Control Plan and Construction Worker Parking Plan that will facilitate traffic and pedestrian movement, minimize the potential conflicts between construction activities, street traffic, bicyclists and pedestrians, and ensure appropriate parking for construction workers is provided. Furthermore, the Construction Management Plan will include, but not be limited to, the following measures:

- A Worksite Traffic Control Plan(s), approved by the LADOT in accordance with the time frames set forth in Executive Directive 1, will be implemented to route vehicular traffic, transit, bicyclists, and pedestrians around any lane and/or sidewalk closures;
- Safety precautions for pedestrians and bicyclists will be implemented through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe access to the Port of Los Angeles High School.
- Minimize obstruction to land uses in proximity to the project site during construction, including temporary traffic constraints, temporary loss of access, and temporary loss of bus stops or rerouting of bus lines;

- Parking for construction workers will be provided either on-site or at off-site, off-street locations; and
- Ensure adequate emergency access is maintained to the project site and neighboring businesses and residences.

Historic Rehabilitation Alternative

As discussed in Section 6.5.1, under the Historic Rehabilitation Alternative, the OSP Specific Plan would not be implemented, and the existing Rancho San Pedro buildings would not be demolished. The existing buildings on the OSP Specific Plan Site would be rehabilitated and would continue to be used for public housing by existing/future residents. The existing housing is generally substandard in quality and does not meet the HUD unit size standards. Existing physical deficiencies would require building upgrades in the long term, as described in the Physical Needs Assessment completed for the existing buildings in 2017 (EMG 2017). The Historic Rehabilitation Alternative would include the necessary extensive repairs to ensure the structures are up to current Building Code standards for historic properties, ensure seismic safety and integrity, remediate suspect asbestos containing materials (ACM) and lead-based paint (LBP) contaminants, modernize building heating, ventilation, and air conditioning (HVAC) systems and appliances to the extent feasible, upgrade and repair electrical systems, remediate Americans with Disabilities Act (ADA) accessibility deficiencies, exterminate any present termites and remediate termite damage, and repair deficient sewer and water infrastructure serving the site. Rehabilitation would be completed in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards) and in accordance with the California Historic Building Code. Rehabilitation activities on the OSP Specific Plan Site would generally involve the use of small hand and power tools typically used for housing renovation. Under the Historic Rehabilitation Alternative, the 327 Harbor Site would be developed with the same land uses as the Proposed Project Alternative, which would consist of a four-story, 47-unit multi-family affordable housing development. Certain PDFs required by the OSP Specific Plan would not be included under the Historic Rehabilitation Alternative, as they would be infeasible or would not be applicable, including the following:

- PDF GHG-1, Photovoltaic Solar
- PDF GHG-2, EV Charging Stations
- PDF GHG-3, Additional Measures
- PDF POL-3, Operational Security
- PDF LIB-1, Universal Wi-Fi
- PDF REC-1, Recreational Programming

Partial Preservation Alternative

As discussed in Section 6.6.1, under the Partial Preservation Alternative, the original portion of Rancho San Pedro, completed in 1942 (refer to Figure 6-1), consisting of 284 dwelling units, would be preserved and rehabilitated in accordance with the Secretary's Standards and in accordance with the California Historic Building Code, as described above under the Historic Rehabilitation Alternative. Building deficiencies identified under the Historic Rehabilitation Alternative would be remediated for those buildings to be preserved and rehabilitated, and the existing, original Rancho San Pedro buildings would continue to serve as public housing. The preserved and rehabilitated buildings would include 284 existing residential units. The Rancho San Pedro expansion that was completed in 1953, which includes 194 existing residential units, would be demolished in phases and redeveloped with

new, improved multi-family housing, amenities, and commercial retail uses under a modified version of the OSP Specific Plan. There would be a total of 1,207 residential units on the OSP Specific Plan Site, consisting of 923 newly constructed residential units, including 194 replacement affordable housing units, 390 market-rate rental units, 275 affordable units, 32 market-rate homeownership units, and 32 affordable homeownership units. In addition, 45,000 sf of commercial uses, 61,500 sf of Neighborhood Serving Uses, and 1 acre of refurbished public open space and 1 acre of new open space would be developed. Under the Partial Preservation Alternative, development on the 327 Harbor Site would consist of a four-story, 47-unit multi-family affordable housing development, consistent with the Proposed Project Alternative.

The reader is referred to Section 6.6.1 for additional details regarding the Partial Preservation Alternative. Specifically, Table 6-5 provides a summary of the development on the OSP Specific Plan Site under the Partial Preservation Alternative and Figure 6-2 show this alternative's conceptual site plan for the OSP Specific Plan Site.

7.3.2 Comparison of the Impacts of the Alternatives

The anticipated impacts from the No Project Alternative and the three project build alternatives are summarized and compared in Table 7-1.

Table 7-1 Impact Summary and Comparison

Impact Area	No Project Alternative	Proposed Project Alternative	Historic Rehabilitation Alternative	Partial Preservation Alternative
Aesthetics/Visual Quality	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> Short-term, <u>less than significant</u> impacts during construction. Long-term <u>less than significant</u> impacts to visual quality of the project site. <i>Indirect:</i> <u>Less than significant</u> long-term impacts to nearby scenic resources due to altered public views of scenic resources from the project site vicinity.	<i>Direct:</i> Short-term, <u>less than significant</u> impacts during construction at the 327 Harbor Site and no impacts at the OSP Specific Plan Site. Long-term <u>less than significant</u> impacts to visual quality of the 327 Harbor Site and no impacts to visual quality of the OSP Specific Plan Site. <i>Indirect:</i> <u>Less than significant</u> long-term impacts to nearby scenic resources due to altered public views of scenic resources from the project site vicinity.	<i>Direct:</i> Short-term, <u>less than significant</u> impacts during construction. Long-term <u>less than significant</u> impacts to visual quality of the project site. <i>Indirect:</i> <u>Less than significant</u> long-term impacts to nearby scenic resources due to altered public views of scenic resources from the project site vicinity.
Air Quality	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> Short-term, <u>less than significant</u> impacts to air quality and human health of sensitive populations during construction due to criteria pollutant and hazardous air pollutant emissions. Long-term <u>less than significant</u> impacts to air quality and human health of sensitive populations during operation. Criteria pollutant emissions would not cause a National Ambient Air Quality Standards (NAAQS) exceedance, change the category of non-attainment status, or conflict with applicable air quality plans. Project operation would not	<i>Direct:</i> Short-term, <u>less than significant</u> impacts to air quality and human health of sensitive populations during construction due to criteria pollutant and hazardous air pollutant emissions. Long-term <u>less than significant</u> impacts to air quality and human health of sensitive populations during operation. Criteria pollutant emissions would not cause a NAAQS exceedance, change the category of non-attainment status, or conflict with applicable air quality plans. Project operation would not include sources of hazardous air pollutant emissions and would not place new sensitive	<i>Direct:</i> Short-term, <u>less than significant</u> impacts to air quality and human health of sensitive populations during construction due to criteria pollutant and hazardous air pollutant emissions. Long-term <u>less than significant</u> impacts to air quality and human health of sensitive populations during operation. Criteria pollutant emissions would not cause a NAAQS exceedance, change the category of non-attainment status, or conflict with applicable air quality plans. Project operation would not include sources of hazardous air pollutant emissions and would not place new sensitive

Impact Area	No Project Alternative	Proposed Project Alternative	Historic Rehabilitation Alternative	Partial Preservation Alternative
		include sources of hazardous air pollutant emissions and would not place new sensitive receptors within 1,000 feet of an existing high-volume roadway or other source of hazardous air pollutant emissions. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts outside the project area due to criteria pollutant and hazardous air pollutant emissions during construction. Long-term <u>less than significant</u> impacts outside the project area due to operational emissions of criteria pollutants and hazardous air pollutants.	receptors within 1,000 feet of an existing high-volume roadway or other source of hazardous air pollutant emissions. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts outside the project area due to criteria pollutant and hazardous air pollutant emissions during construction. Long-term <u>less than significant</u> impacts outside the project area due to operational emissions of criteria pollutants and hazardous air pollutants.	receptors within 1,000 feet of an existing high-volume roadway or other source of hazardous air pollutant emissions. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts outside the project area due to criteria pollutant and hazardous air pollutant emissions during construction. Long-term <u>less than significant</u> impacts outside the project area due to operational emissions of criteria pollutants and hazardous air pollutants.
Global Climate Change, Greenhouse Gas Emissions, and Sea Level Rise	<i>Direct and Indirect:</i> No impacts	<i>Direct and Indirect:</i> <u>Less than significant</u> short-term and long-term impacts related to climate change and sea level rise due to increased GHG emissions. <u>Less than significant</u> long-term impacts related to the effects of climate change and sea level rise on the project site.	<i>Direct and Indirect:</i> <u>Less than significant</u> short-term and long-term impacts related to climate change and sea level rise due to increased GHG emissions. <u>Less than significant</u> long-term impacts related to the effects of climate change and sea level rise on the project site.	<i>Direct and Indirect:</i> <u>Less than significant</u> short-term and long-term impacts related to climate change and sea level rise due to increased GHG emissions. <u>Less than significant</u> long-term impacts related to the effects of climate change and sea level rise on the project site.
Energy	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> Short-term, <u>less than significant</u> impacts related to construction energy use. <u>Less than significant</u> long-term impacts to energy supply and capacity due to increased	<i>Direct:</i> Short-term, <u>less than significant</u> impacts related to construction energy use. <u>Less than significant</u> long-term impacts to energy supply and capacity due to increased	<i>Direct:</i> Short-term, <u>less than significant</u> impacts related to construction energy use. <u>Less than significant</u> long-term impacts to energy supply and capacity due to increased

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Impact Area	No Project Alternative	Proposed Project Alternative	Historic Rehabilitation Alternative	Partial Preservation Alternative
		electricity and transportation fuel use during project operation. <i>Indirect:</i> would not result in indirect impacts related to energy supply, use, and costs.	electricity and transportation fuel use during project operation. <i>Indirect:</i> would not result in indirect impacts related to energy supply, use, and costs.	electricity and transportation fuel use during project operation. <i>Indirect:</i> would not result in indirect impacts related to energy supply, use, and costs.
Geology and Soils	<i>Direct:</i> No impacts <i>Indirect:</i> <u>Beneficial</u> impact due to reduced risk of loss, injury and death due to seismic retrofitting of existing structures.	<i>Direct:</i> <u>Less than significant</u> short-term and long-term impacts related to soil erosion during construction and operation. <i>Indirect:</i> <u>Less than significant</u> long-term impacts related to the exposure of people and structures to risks associated with radon, seismic hazards, and soil hazards.	<i>Direct:</i> <u>Less than significant</u> short-term and long-term impacts related to soil erosion during construction and operation. <i>Indirect:</i> <u>Less than significant</u> long-term impacts related to the exposure of people and structures to risks associated with radon, seismic hazards, and soil hazards.	<i>Direct:</i> <u>Less than significant</u> short-term and long-term impacts related to soil erosion during construction and operation. <i>Indirect:</i> <u>Less than significant</u> long-term impacts related to the exposure of people and structures to risks associated with radon, seismic hazards, and soil hazards.
Hazards and Hazardous Materials	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to risk of spills of hazardous materials during construction. <u>Less than significant</u> short-term impacts related to exposure of people to hazardous materials due to the demolition of buildings containing asbestos and lead-based paint and excavation and disposal of existing contaminated soils during construction. <u>Less than significant</u> long-term impacts due to the use of common household hazardous materials during	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to risk of spills of hazardous materials during construction. <u>Less than significant</u> short-term impacts related to exposure of people to hazardous materials due to the rehabilitation of buildings containing asbestos and lead-based paint at the OSP Specific Plan Site and excavation and disposal of existing contaminated soils at the 327 Harbor Site during construction. <u>Less than significant</u> long-term impacts due to the use of common household hazardous materials during project operation. <u>Beneficial</u> long-term	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to risk of spills of hazardous materials during construction. <u>Less than significant</u> short-term impacts related to exposure of people to hazardous materials due to the demolition of buildings containing asbestos and lead-based paint and excavation and disposal of existing contaminated soils during construction. <u>Less than significant</u> long-term impacts due to the use of common household hazardous materials during project operation. <u>Beneficial</u> long-term impacts

Impact Area	No Project Alternative	Proposed Project Alternative	Historic Rehabilitation Alternative	Partial Preservation Alternative
		project operation. <u>Beneficial</u> long-term impacts due to the removal of contaminated soil. <i>Indirect: Less than significant</i> short-term impacts related to the risk of off-site release during transport and disposal of contaminated soil and hazardous building materials during construction.	impacts due to the removal of contaminated soil at the 327 Harbor Site. <i>Indirect: Less than significant</i> short-term impacts related to the risk of off-site release during transport and disposal of contaminated soil and hazardous building materials during construction.	due to the removal of contaminated soil. <i>Indirect: Less than significant</i> short-term impacts related to the risk of off-site release during transport and disposal of contaminated soil and hazardous building materials during construction.
Historic Resources	<i>Direct: No impacts</i> <i>Indirect: No impacts</i>	<i>Direct: Potentially significant</i> direct impacts due to the demolition of Rancho San Pedro, a historic resource. <i>Indirect: Less than significant</i> short-term and long-term impacts due to noise, vibration, or visual effects that would materially alter in an adverse manner the characteristics of the historic and archaeological resources within the indirect APE that convey their historical significance.	<i>Direct: No impacts</i> <i>Indirect: Less than significant</i> short-term and long-term impacts due to noise, vibration, or visual effects associated with development of the 327 Harbor Site that would materially alter in an adverse manner the characteristics of the historic and archaeological resources within the indirect APE that convey their historical significance.	<i>Direct: Potentially significant</i> direct impacts due to the demolition of portions of Rancho San Pedro, a historic resource. <i>Indirect: Less than significant</i> short-term and long-term impacts due to noise, vibration, or visual effects that would materially alter in an adverse manner the characteristics of the historic and archaeological resources within the indirect APE that convey their historical significance.
Land Use and Planning	<i>Direct: No impacts</i> <i>Indirect: No impacts</i>	<i>Direct: The existing land use would be altered but permanent displacement, or division of the community would not occur. Short-term and long-term impacts related to land use would be less than significant.</i> <i>Indirect: Development would not conflict with or be incompatible with existing</i>	<i>Direct: No impact</i> would occur due to rehabilitation of existing buildings on the OSP Specific Plan Site. Development of the 327 Harbor Site would not displace residents, divide the community, or conflict with the existing zoning and land use regulations for the site. There would be <u>no</u> short-term or long-	<i>Direct: The existing land use would be altered but permanent displacement, or division of the community would not occur. Short-term and long-term impacts related to land use would be less than significant.</i> <i>Indirect: Development would not conflict with or be incompatible with existing</i>

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		development and zoning in the project site vicinity, and short- and long-term impacts would be <u>less than significant</u> .	term impacts related to land use and planning. <i>Indirect:</i> Development would not conflict with or be incompatible with existing development and zoning in the project site vicinity, and there would be <u>no</u> short- or long-term impacts.	development and zoning in the project site vicinity, and short- and long-term impacts would be <u>less than significant</u> .
Noise and Vibration	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Potentially significant</u> short-term impacts due to construction noise and vibration at sensitive land uses. <u>Potentially significant</u> long-term impacts due to operational noise associated with outdoor recreation and park areas at the OSP Specific Plan Site. <u>Less than significant</u> impacts related to the exposure of future residents to unacceptable noise levels. <i>Indirect:</i> <u>Less than significant</u> long-term impacts due to noise and vibration from off-site project-generated traffic.	<i>Direct:</i> <u>Potentially significant</u> short-term impacts due to noise and vibration at sensitive land uses produced during construction of the 327 Harbor Site. <u>Less than significant</u> long-term impacts due to operational noise and the exposure of future residents to unacceptable noise levels. <i>Indirect:</i> <u>Less than significant</u> long-term impacts due to noise and vibration from off-site project-generated traffic.	<i>Direct:</i> <u>Potentially significant</u> short-term impacts due to construction noise and vibration at sensitive land uses. <u>Potentially significant</u> long-term impacts due to operational noise associated with outdoor recreation and park areas at the OSP Specific Plan Site. <u>Less than significant</u> impacts related to the exposure of future residents to unacceptable noise levels. <i>Indirect:</i> <u>Less than significant</u> long-term impacts due to noise and vibration from off-site project-generated traffic.
Public Services	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts to access to public services and response times during construction due to lane closures and construction traffic. <u>Less than significant</u> long-term impacts due to increased service	<i>Direct:</i> <u>Less than significant</u> short-term impacts to access to public services and response times during construction due to lane closures and construction traffic associated with the 327 Harbor Site development. <u>Less than significant</u> long-term impacts due to minor increase in the	<i>Direct:</i> <u>Less than significant</u> short-term impacts to access to public services and response times during construction due to lane closures and construction traffic. <u>Less than significant</u> long-term impacts due to increased service populations and demand for public services.

Impact Area	No Project Alternative	Proposed Project Alternative	Historic Rehabilitation Alternative	Partial Preservation Alternative
		populations and demand for public services. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to demand for public services during construction due to an influx of construction workers	service population and demand for public services associated with development of the 327 Harbor Site. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to demand for public services during construction due to an influx of construction workers.	<i>Indirect:</i> Short-term, <u>less than significant</u> impacts to demand for public services during construction due to an influx of construction workers
Recreation	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> long-term impacts to parks and recreational facilities due to increased service populations and demand. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to demand for parks and recreational facilities during construction due to an influx of construction workers	<i>Direct:</i> <u>Less than significant</u> long-term impacts to parks and recreational facilities due to a minor increase in service populations and demand associated with development of the 327 Harbor Site. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to demand for parks and recreational facilities during construction due to an influx of construction workers.	<i>Direct:</i> <u>Less than significant</u> long-term impacts to parks and recreational facilities due to increased service populations and demand. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to demand for parks and recreational facilities during construction due to an influx of construction workers.
Transportation and Circulation	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to traffic congestion and emergency access during construction due to lane closures and construction traffic. <u>Less than significant</u> long-term impacts to pedestrian and bicycle facilities, and transit services and facilities due to proposed improvements to transportation facilities. <u>Potentially significant</u> long-term direct impacts to three	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to traffic congestion and emergency access during construction due to lane closures and construction traffic. <u>Less than significant</u> long-term impacts to pedestrian and bicycle facilities, and transit services and facilities due to proposed improvements to transportation facilities. <u>Less than significant</u> long-term direct impacts to intersections in the study area.	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to traffic congestion and emergency access during construction due to lane closures and construction traffic. <u>Less than significant</u> long-term impacts to pedestrian and bicycle facilities, and transit services and facilities due to proposed improvements to transportation facilities. <u>Potentially significant</u> long-term direct impacts to three

Impact Area	No Project Alternative	Proposed Project Alternative	Historic Rehabilitation Alternative	Partial Preservation Alternative
		intersections in the study area due to unacceptable intersection queueing. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to on-street parking supply during construction due to an influx of construction workers. Long-term, <u>beneficial</u> impacts to on-street parking supply due to the provision of on-site parking spaces.	<i>Indirect:</i> Short-term, <u>less than significant</u> impacts to on-street parking supply during construction due to an influx of construction workers. Long-term, <u>no impacts</u> to on-street parking supply.	intersections in the study area due to unacceptable intersection queueing. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to on-street parking supply during construction due to an influx of construction workers. Long-term, <u>beneficial</u> impacts to on-street parking supply due to the provision of on-site parking spaces.
Water Resources and Water Quality	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts to surface and ground water quality related to risk of spills of hazardous materials, erosion and siltation, stormwater discharges, and temporary dewatering during construction. <u>Beneficial</u> long-term impacts due to reduced stormwater runoff at the OSP Specific Plan Site. <u>Less than significant</u> long-term impacts to surface and groundwater quality due to the increased use of household hazardous materials and the potential for spills. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to off-site surface water quality from construction activities.	<i>Direct:</i> <u>Less than significant</u> short-term impacts to surface and ground water quality related to risk of spills of hazardous materials, erosion and siltation, stormwater discharges, and temporary dewatering during construction. <u>Less than significant</u> long-term impacts to surface and groundwater quality due to the minor increase in use of household hazardous materials and the potential for spills at the 327 Harbor Site. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to off-site surface water quality from construction activities.	<i>Direct:</i> <u>Less than significant</u> short-term impacts to surface and ground water quality related to risk of spills of hazardous materials, erosion and siltation, stormwater discharges, and temporary dewatering during construction. <u>Less than significant</u> long-term impacts to surface and groundwater quality due to the increased use of household hazardous materials and the potential for spills. <i>Indirect:</i> Short-term, <u>less than significant</u> impacts to off-site surface water quality from construction activities.

Impact Area	No Project Alternative	Proposed Project Alternative	Historic Rehabilitation Alternative	Partial Preservation Alternative
Utilities and Service Systems	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts to the supply, demand, capacity, and availability of utility services during construction. <u>Less than significant</u> long-term impacts due to increased electricity use, water consumption, solid waste production, and wastewater flows. <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts to the supply, demand, capacity, and availability of utility services during construction. <u>Less than significant</u> long-term impacts due to minor increase in electricity use, water consumption, solid waste production, and wastewater flows associated with development of the 327 Harbor Site. <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts to the supply, demand, capacity, and availability of utility services during construction. <u>Less than significant</u> long-term impacts due to increased electricity use, water consumption, solid waste production, and wastewater flows. <i>Indirect:</i> No impacts
Socioeconomics	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to displacement of residents and commute times due to lane closures during construction. <u>Beneficial</u> short-term impacts related to job creation during construction. <u>Beneficial</u> long-term impacts due to new jobs created, increased housing availability, increased property values, improved vehicular, transit and active transportation infrastructure, and new amenities. <i>Indirect:</i> <u>Beneficial</u> long-term impacts due to improved social connectedness.	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to displacement of residents and commute times due to lane closures during construction. <u>Beneficial</u> short-term impacts related to job creation during construction. <u>Beneficial</u> long-term impacts due to improved housing conditions and property values. <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to displacement of residents and commute times due to lane closures during construction. <u>Beneficial</u> short-term impacts related to job creation during construction. <u>Beneficial</u> long-term impacts due to new jobs created, increased housing availability, increased property values, improved vehicular, transit and active transportation infrastructure, and new amenities. <i>Indirect:</i> <u>Beneficial</u> long-term impacts due to improved social connectedness.

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Environmental Justice	<i>Direct:</i> No impacts <i>Indirect:</i> No impacts	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to displacement of residents and disproportionate exposure of low-income and/or minority populations to air pollutants and noise during construction. <u>Beneficial</u> short-term impacts related to job creation during construction. <u>Beneficial</u> long-term impacts due to new jobs created, increased housing availability and affordable housing supply, improved community cohesion, improved vehicular, transit and active transportation infrastructure, and new amenities. <i>Indirect:</i> <u>Beneficial</u> long-term impacts due to public involvement in the design of the project through the One San Pedro Transformation Plan process and public involvement in the EIR/EIS process, increased property values, and improved social connectedness.	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to displacement of residents and disproportionate exposure of low-income and/or minority populations to air pollutants and noise during construction. <u>Beneficial</u> long-term impacts due to improved housing conditions at the OSP Specific Plan Site and increased affordable housing supply at the 327 Harbor Site. <i>Indirect:</i> <u>Beneficial</u> long-term impacts due to the potential for public involvement in the EIR/EIS process and increased property values.	<i>Direct:</i> <u>Less than significant</u> short-term impacts related to displacement of residents and disproportionate exposure of low-income and/or minority populations to air pollutants and noise during construction. <u>Beneficial</u> short-term impacts related to job creation during construction. <u>Beneficial</u> long-term impacts due to new jobs created, increased housing availability and affordable housing supply, improved community cohesion, improved vehicular, transit and active transportation infrastructure, and new amenities. <i>Indirect:</i> <u>Beneficial</u> long-term impacts due to the potential for public involvement in the EIR/EIS process and increased property values.

7.4 Affected Environment and Environmental Consequences

7.4.1 Introduction

This section describes the potential direct and indirect effects or impacts to the physical, natural, cultural, and socioeconomic environment of the No Project Alternative and the three build alternatives. In accordance with 40 CFR Section 1508.20, this section of the EIS also recommends mitigation measures that could be implemented to avoid, minimize, rectify, reduce, or compensate for potential adverse impacts, if feasible. This section also provides a brief summary of existing environmental conditions and lists the applicable federal laws/regulations. This section includes information presented in detail in Sections 1 through 6 of the EIR/EIS. A detailed environmental impacts analysis for resource areas is presented in Section 4, *Environmental Impacts Analysis*. Potential cumulative effects are also discussed in this section.

7.4.1.1 Approach to the Analysis

NEPA requires the consideration and disclosure of potential direct, indirect, and cumulative environmental impacts⁸ in the evaluation of any proposed federal action. Direct impacts are those that are caused by the project and occur at the same time and place (e.g., direct tree removal). Indirect impacts are those related to the project that occur later in time or are further removed in distance. Indirect effects may further include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems (40 CFR Section 1508.8). Cumulative impacts on the environment result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions (40 CFR Section 1508.7).

As described by CEQ regulations (40 CFR Section 1508.27), the significance of effects is defined in terms of both context and intensity. Context refers to the portion or geographic extent of the environment that could reasonably be expected to experience a meaningful change as a result of a proposed action. A “contextual” review means that the significance of an action must be analyzed in one or more of the various contexts of a proposed action, such as society as a whole, the affected region, the affected interests, or the locality. Intensity refers to the severity of an impact and is evaluated in terms of the type, quality, duration (short-term or long-term), and sensitivity of the resource involved. Specifically, CEQ regulations require the following factors to be considered when evaluating intensity:

- Degree to which adverse effects outweigh beneficial effects, or vice versa;
- Degree to which the proposed action affects public health or safety;
- Unique characteristics in the geographic area;
- Degree of controversy;
- Degree to which the possible effects on the human environment may be highly uncertain or involve unique or unknown risks;

⁸ Within this analysis, the terms “impact” and “effect” are synonymous and used interchangeably.

- Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration;
- Whether the action is related to other actions with individually insignificant but cumulatively significant impacts;
- Degree to which the action may affect significant scientific, cultural, or historical resources;
- Degree to which the action may adversely affect federally listed threatened and endangered species; and
- Whether the action threatens to violate a federal, State, or local law or requirement imposed for the protection of the environment.

The level at which an impact is considered significant is defined by established significance criteria or thresholds; thresholds may be quantitative or qualitative. They may be based on scientific data relative to the lead agency's jurisdiction; legislative or regulatory performance standards of federal, State, regional, or local agencies; relevant models; or other factors. Significance thresholds are specific to each technical resource area; therefore, each technical resource area analysis in this section clearly presents the thresholds that are applied in the analysis.

Based on these resource-specific significance thresholds, the conclusion of each impact analysis under each technical resource area provides a significance determination of the potential effects for the No Project Alternative and each build alternative. The following broad classifications are consistently used throughout this section to denote the significance of potential environmental impacts:

- **No Impact.** This classification applies if there is either no potential for impact, or if the impact would be negligible⁹. If regulatory standards apply, the impact would be well below those standards. Resources classified with a "No Impact" significance criterion do not require mitigation.
- **Less Than Significant.** This classification applies if the alternative would result in an adverse effect that has measurable changes on a local or regional level but would not reach the threshold of significance. Mitigation measures or PDFs might be appropriate or recommended to further reduce this impact.
- **Potentially Significant.** This classification applies if the alternative would potentially result in an adverse effect that has measurable changes on a local or regional level that exceed the threshold of significance. Such an impact may or may not be able to be mitigated to less than significant levels through the implementation of PDFs and/or mitigation measures. The analysis identifies the anticipated post-mitigation level of significance in each applicable case. If regulatory standards apply, the impact would exceed those standards.
- **Beneficial.** A beneficial impact is an impact that would cause a positive change or improvement in the environment and for which no mitigation measures would be required.

The Thresholds of Significance and Methodology section for each technical resource area provides the basis for the impact analysis, relative to the significance criteria, and identifies and defines applicable regulatory guidelines, thresholds, or standards used to assess the significance of environmental impacts during both the construction and operational phases of the project, as appropriate. This section also identifies which of the significance criteria, if any, do not apply to the project and the alternatives and why those criteria are not discussed further.

⁹ "Negligible" can be defined as "so small or unimportant as to be not worth considering; insignificant."

Further, the conclusion of each impact analysis indicates whether mitigation measures would be warranted. Mitigation measures are project-specific actions that are not routinely implemented by LAHD but that are necessary for the project to avoid, minimize, rectify, reduce, or compensate for identified potentially significant adverse impacts. Per established protocols, procedures, and requirements, LAHD would also implement PDFs and satisfy all applicable regulatory requirements in association with the project.

Methodology of the Cumulative Effects Analysis

In accordance with 40 CFR Section 1508.7, and as detailed in CEQ guidance entitled *Considering Cumulative Effects Under the National Environmental Policy Act (1997)* and *Memorandum: Guidance on the Considerations of Past Actions in Cumulative Effects Analysis (June 24, 2005)*, LAHD must analyze the potential cumulative effects that may occur when considering the project “when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions.” Each of these actions has the potential to affect resources in the same time and space as the project; as such, these potential combined effects need to be analyzed.

As described in Section 3.4, *Cumulative Development*, cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary. The specific boundaries for the cumulative study area of each resource area are identified in the applicable resource area section below.

The cumulative effects analysis must determine if construction and operation of the project, as assessed in this EIS, have the possibility to result in either adverse or beneficial cumulative impacts when considering other past, present, and future projects in the cumulative study area. The scope of the cumulative impacts analysis therefore includes those activities associated with the construction and operation of the project alternatives and cumulative projects that have occurred, are occurring, or are planned for the reasonably foreseeable future.

Cumulative effects occur when the direct or indirect effects of the project alternative are aggregated with the effects of other present and reasonably foreseeable future projects. They can also be aggregated with effects of past projects if, for example, a project would fill the last remaining wetlands in an area. This analysis evaluates whether individually minor effects occurring in the same geographic and/or temporal space may be cumulatively significant over a period of time.

Projects Considered for the Cumulative Effects Analysis

As described in Section 3.4, *Cumulative Development*, currently planned and pending projects within a 0.5-mile radius of the project site are listed in Table 3-1 and shown on Figure 3-1 of the EIR/EIS. In particular, the 111 North Harbor Boulevard Project (Cumulative Project No. 5), 319-345 Beacon Street and 117 O’Farrell Street Project (Cumulative Project No. 11), and 511 South Harbor Boulevard Project (Cumulative Project No. 4) are either located in close proximity or along the same major arterial as the project site and construction schedules may overlap. The cumulative projects listed in Table 3-1 are considered in the cumulative impact analyses.

7.4.1.2 Resources Considered but Eliminated from Further Analysis

in the EIS

Airport Hazards

The nearest airport to the project site is the Long Beach Municipal Airport, located approximately 9 miles southeast. The project site is not located in the Long Beach Municipal Airport compatibility zone or influence area (Los Angeles County Airport Land Use Commission 2003). There are no private airstrips within 2 miles of the project site. For this reason, no direct or indirect impacts would occur.

Coastal Barrier Resources

The Coastal Barrier Resources System consists of relatively undeveloped coastal barriers and other areas located the Atlantic, Gulf of Mexico, Great Lakes, U.S. Virgin Islands, and Puerto Rico coasts. The Coastal Barrier Resources System units are identified and depicted on a series of official maps maintained by the United States Fish and Wildlife Service (USFWS; 2023a). There are no coastal barrier resources mapped along the entire coastline of California, including along the city of Los Angeles (USFWS 2019). For this reason, no direct or indirect impacts would occur.

Floodplain Management and Flooding

Federal Emergency Management Agency flood maps indicate the project site is located within Zone X, which is defined as “areas determined to be outside of the 0.2 percent annual chance floodplain” (Federal Emergency Management Agency 2021). For this reason, no direct or indirect impacts would occur.

Coastal Zone

The project site is not located within the Coastal Zone and therefore is not subject to the provisions of the Coastal Zone Management Act (City of Los Angeles 2003). For this reason, no direct or indirect impacts would occur.

Farmlands and Agricultural Resources

As described in Section 4.16, *Effects Found Not to be Significant*, the project site does not contain agricultural uses, and the California Department of Conservation identifies the project site as Urban and Build-Up Land (California Department of Conservation 2022). For these reasons, no direct or indirect impacts would occur.

Sole Source Aquifers

There are no sole source aquifers in the City of Los Angeles or Los Angeles County. The nearest sole source aquifer to the project site is approximately 100 miles away near the shared border between United States and Mexico (U.S. EPA 2023). For this reason, no direct or indirect impacts to sole source aquifers would occur.

Federal Wetlands and Waters of the United States

As described in Section 4.16, *Effects Found Not to be Significant*, the project site is in an urbanized area and no federally protected wetlands or waters of the United States occur on or adjacent to the project site (USFWS 2023b). For this reason, no direct or indirect impacts to federally protected wetlands or waters of the United States would occur.

Wild and Scenic Rivers

The Wild and Scenic Rivers Act was passed in 1968 to preserve and protect designated rivers for their natural, cultural, and recreational value. There are no designated Wild and Scenic Rivers within the project site. For this reason, no direct or indirect impacts to Wild and Scenic Rivers would occur (Bureau of Land Management et al. 2023).

Unique Natural Features

The project site is developed with no unique natural features, such as sand dunes, waterfalls, caves, fossil beds, or coral reefs, existing on or in the vicinity of the project site. For this reason, no direct or indirect impacts to unique natural features would occur.

Federally Listed as Threatened and Endangered Species

As described in Section 4.16, *Effects Found Not to be Significant*, trees on and in the vicinity of the project site could provide nesting habitat for a variety of bird species. The project must comply with the federal Migratory Bird Treaty Act (16 USC Sections 703-711). HUD's Environmental Assessment Factors and Categories Guide states that construction activities should occur outside the migratory bird nesting season or, if this is not feasible, that a survey for migratory bird nests should be conducted prior to construction. To comply with these guidelines, nesting bird surveys would be completed by a qualified biologist no more than seven days prior to the start of any construction activities that occur during the bird nesting season (February 1 to August 31). If nests are identified, appropriate avoidance buffers would be established, and nests would be monitored weekly by the qualified biologist until nesting/breeding is completed. With compliance with these regulations and HUD guidelines, no permanent impacts to nesting birds would occur. Vegetation on the project site is limited to ruderal vegetation, ornamental trees, shrubs, and grasses. No federally listed as threatened or endangered plant or animal species are present at the project site. For these reasons, no direct or indirect impacts to federally listed as threatened or endangered species would occur.

Vegetation and Plant Communities

The project site is developed, and vegetation consists of ornamental vegetation, ruderal vegetation, and trees. The project site does not contain suitable habitat for sensitive plant or animal species, nor sensitive plant communities. Pursuant to the City's Protected Tree Ordinance and LAMC Section 62.171, the project would include replacement trees at the required ratio for any trees removed during construction. For this reason, no direct or indirect impacts to vegetation and plant communities would occur.

7.4.2 Aesthetics/Visual Quality

This section analyzes the potential impacts of the project alternatives on aesthetics/visual quality in the project area. A direct impact would occur if the alternative would directly change a scenic view or contrast markedly with the surrounding aesthetics of an area. An indirect impact would occur if the alternative would induce other changes that could affect the visual resource landscape. For example, an indirect impact would occur if the alternative contributes to a future change in land use that alters the viewshed in a marked way. This analysis specifically addresses the potential for the project alternatives to change the visual quality/character of the affected environment.

7.4.2.1 Affected Environment

The project site and surrounding area feature urban development that includes multi-story office, residential, and industrial uses. The OSP Specific Plan Site encompasses approximately nine city blocks between Santa Cruz Street, Palos Verdes Street, Beacon Street, Harbor Boulevard, 1st Street, 2nd Street, 3rd Street, Mesa Street, and Centre Street, with rowhouse-style, two-story apartment buildings characterizing development throughout the OSP Specific Plan Site. As discussed in Section 4.1.1, apartment frontages along Harbor Boulevard create an urban street wall with a minimal setback from the sidewalk and low shrubs planted in the stoop frontages. The existing architectural style of the built environment on the OSP Specific Plan Site is unremarkable with flat roofs, limited variation in massing, and inconsistent exterior finishes. Furthermore, the buildings are in poor condition and some of the blocks contain dirt lots with no landscaping. These factors contribute to the poor aesthetic and visual quality of the OSP Specific Plan Site. Open spaces are used for outdoor storage. While consistent in form, the built environment on the OSP Specific Plan Site does not create a sense of unified design with the surrounding, newer development, including residential and office uses. The 327 Harbor Site is currently a vacant site with ruderal vegetation and two palm trees enclosed by a chain-linked fence. The site has low visual quality due to the undeveloped and unmaintained nature of the lot.

As discussed in Section 4.1.1, scenic resources in the vicinity of the project site include the following:

- **Vincent Thomas Bridge**, a suspension bridge built in the early 1960s that links San Pedro with Terminal Island. The bridge is 6,050 feet long with 365-foot-high suspension towers, making it the third longest suspension bridge in California. Since 2005, it has been illuminated with solar-powered LED lights that operate from dusk to midnight, creating a dramatic landmark and gateway welcoming visitors to Los Angeles (approximately 0.6 mile northeast of the project site).
- **Mary Star of the Sea** parish church, a prominent landmark with a steeple-top statue overlooking the harbor (approximately 1.2 miles west of project site).
- **John S. Gibson Junior Park and Fisherman Industry Memorial**, is a landscaped, pocket park to the east of Harbor Boulevard that contains the Fisherman Industry Memorial and offers views of the harbor and the Port of Los Angeles (approximately 400 feet southeast of project site).
- **San Pedro Fish Market**, an important activity center that reflects San Pedro's heritage of fishing families who came from the Mediterranean and Adriatic areas (approximately 0.6 mile southeast of project site).
- **Ports O'Call**, a New England-style seaside village with shops, restaurants, and attractions that overlook the Port of Los Angeles and is being redeveloped with the new LA Waterfront development at the time this Draft EIR/EIS was written (approximately 0.6 mile southeast of project site). The LA Waterfront redevelopment project includes the development of the 42-acre West Harbor area with a waterfront promenade, restaurants, retail, and offices; the 35-acre AltaSea science and education campus at City Dock No. 1 in the Port of Los Angeles; the Wilmington waterfront promenade; and a new pedestrian promenade and bridge along Avalon Boulevard connecting to the future Wilmington Promenade (City of Los Angeles 2022).
- **Palos Verdes/Rolling Hills**, scenic, natural landscape of soft, rolling hills immediately north of the San Pedro community boundary (approximately 6 miles west of project site).
- **Pacific Ocean**, located to the south and east of the project site.

Scenic views of these resources are available from roadways surrounding the project site, such as Harbor Boulevard.

Regulatory Setting

The following laws, regulations, and plans applicable to aesthetics and visual quality are discussed in Section 4.1.2:

- California Scenic Highway Program
- California Historic Parkways
- California Senate Bill 743
- Assembly Bill 1560
- City of Los Angeles General Plan Framework Element
- City of Los Angeles General Plan Conservation Element
- San Pedro Community Plan
- Pacific Corridors Redevelopment Plan
- One San Pedro Transformation Plan
- City of Los Angeles Code of Ordinances
- City of Los Angeles Citywide Design Guidelines

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to air quality are provided in Table 7-3.

Table 7-2 Aesthetic/Visual Quality Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	▪ No or negligible change in the factors contributing to the value of visual resources in the project area, such as visual quality/character or viewer sensitivity ▪ Transient or no/negligible visual effects
	Indirect Effect	▪ Would not induce further adverse changes to visual resources over time in the project area
	Applies to All Effect Types	▪ No discernable changes in the region or locally ▪ Would only alter visual resources for a negligible period of time
Less Than Significant	Direct Effect	▪ Would result in minimal changes to existing visual resources, such as intermittently noticeable changes in visual quality/character that are marginally negative ▪ Would result in low to moderate viewer sensitivity ▪ Would result in minimal limitations to the access of visual resources
	Indirect Effect	▪ Could induce minor changes to visual resources over time in the project area, such as actions that would limit access to visual resources
	Applies to All Effect Types	▪ Visual resources would only be altered for the duration of the construction phase or a portion of the operations phase ▪ Impacts would be localized in specific areas and not affect high-value visual resources

Impact Level	Type of Effect	Impact Description
Potentially Significant	Direct Effect	- Would result in a substantial loss or degradation of a high-value visual resource - Would result in a moderately high to high viewer sensitivity - Would result in fundamental and irreversible negative change in visual character/quality
	Indirect Effect	- Would induce additional changes that could result in substantial loss or degradation of a high-value visual resource - Would induce changes that result in future access limitation to, or reductions of, a high-value visual resource - Would initiate processes that would lead to permanent or persistent changes to visual character/quality due to future activities
	Applies to All Effect Types	Would permanently adversely alter high-quality visual resources or substantially adversely change the aesthetic environment
Beneficial	Direct Effect	- Would beautify and/or improve access to/visibility of visual resources - Would result in positive change in the factors contributing to the value of visual resources in the project area, including visual character/quality or viewer sensitivity
	Indirect Effect	- Would promote or contribute to future changes that would beautify and/or improve access to/visibility of visual resources - Would induce further positive changes to visual resources over time in the project area
	Applies to All Effect Types	Would result in benefits to visual resources

The project alternatives were evaluated to determine the potential for changes to the existing conditions related to aesthetics and visual quality in the project area. A number of factors determine the change to visual quality, change to character, overall resource visibility of a resource, and, ultimately, any potentially significant impacts that could result from implementation of a project alternative. Factors used to understand the potential changes to the visual environment include:

- Existing visual character
- Level of existing visual quality
- Proposed visual character/quality under the project alternatives
- Level of change to visual character/quality anticipated
- Level of viewer sensitivity (viewer awareness and exposure) based on the anticipated change

The level of change to visual quality/character was determined based on a comparison between existing and proposed visual quality/character. Factors that were considered included proposed changes in landform, buildings, vegetation, structures, roadways, and other project features that would alter existing conditions in a noticeable, direct way. Combined with viewer sensitivity, the anticipated level of change to visual quality/character determines the level of impact significance relative to the thresholds of significance. Potential impacts during both construction and operational phases were considered, as well as the potential for direct and indirect impacts.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve new development or alter any existing on-site uses of the project site. Activities under the No Project Alternative would be limited to necessary renovations and maintenance of the existing buildings on the OSP Specific Plan Site. The No Project Alternative would not alter the existing visual quality of the project site, affect nearby scenic resources, or result in discernable changes in the region or locally. Therefore, the No Project Alternative would result in no direct or indirect impacts to aesthetics and visual quality.

Proposed Project Alternative

CONSTRUCTION EFFECTS

During construction, heavy equipment, construction fencing, and other components used to complete construction tasks and ensure site safety would be present on the project site. While large equipment and other construction components would alter the visual quality in the area for the limited duration of construction, it would not affect visual quality over the long term. Construction would be required to comply with all City regulations that govern construction activities, including trash removal and equipment storage to reduce visual impacts. Furthermore, construction would not affect the scenic resources identified above or public views of these resources in any direction due to the distance, intervening development, and orientation of the project site relative to scenic vistas. Views from Harbor Boulevard east toward the Pacific Ocean, north toward the Vincent Thomas Bridge, and south toward the Ports O' Call Village would not be affected by construction of the Proposed Project Alternative as all activity would occur west of the roadway. Construction impacts would be further reduced through the installation of screening that would shield outside views of construction areas, in compliance with Mitigation Measure AES-1 included in Section 4.1.3. Because of its temporary nature, construction of the Proposed Project Alternative would result in less than significant direct and indirect impacts to aesthetic resources and visual quality.

OPERATIONAL EFFECTS

As described above under *Affected Environment*, the project site is characterized by low visual quality under existing conditions. Refer to Section 4.1.3 for representative images of the project site. On the OSP Specific Plan Site, the Proposed Project Alternative would build clusters of buildings that range from one to eight stories with large public open space areas along Palos Verdes Street, between the end of 2nd Street and Harbor Boulevard. On the 327 Harbor Site, the Proposed Project Alternative would build a 66,210-sf, four-story residential building with new landscaping and public art.

The project site is located west of Harbor Boulevard and would not interfere with views from that roadway toward the Ports O' Call Village, the Vincent Thomas Bridge, or the Pacific Ocean beyond. Even at lower heights (two- to three-stories), existing development largely blocks views toward the western foothills of the Palos Verdes peninsula, with only interim views occurring along the east/west-oriented streets. These views would remain, in large part but would be framed by the more impressive corridors formed by the new development under the Proposed Project Alternative. From Palos Verdes Street looking northeast, the Vincent Thomas Bridge is not visible due to intervening development. Refer to Section 4.1.3 for representative images of public views of these scenic

resources from roadways surrounding the project site. Implementation of the Proposed Project Alternative would not change these conditions but would enhance views in the immediate vicinity through improved architectural design and increased landscaping, and impacts to views of scenic resources would be less than significant.

The conceptual drawings provided in Section 4.1.3 illustrate the Proposed Project Alternative design. On the OSP Specific Plan Site, buildings of varied heights with changes in massing and building orientation, contemporary architectural finishes, and consistently designed landscaping would be developed to transform the site into a contemporary, urban neighborhood with open spaces, amenities, and commercial uses, creating a sense of place within the site and unifying the site with the surrounding neighborhood development. The design and layout of the proposed building at the 327 Harbor Site would be centered around a courtyard. The building would feature a modern, rectilinear architectural style common of other multi-family and mixed-use residential communities currently under construction or recently constructed in the San Pedro area. Proposed building materials would consist of durable materials, including composite panels, perforated metal panels, and cement plaster. The design incorporates a white, gray, and blue color scheme reflective of the ocean/marine environment. The building would feature murals and/or artwork from local artists, balconies, and variations in exterior surfaces to provide visual interest. The project would also add new landscaping along the building frontages, including street trees, grasses, and shrubbery to improve the pedestrian environment.

The project site is also adjacent to newer, high-rise developments with a more pronounced urban design than the existing development, where the structural features like I-beams are visible and serve as ornamental detailing. Increases in density have been occurring throughout the area with implementation of the San Pedro Community Plan. These include the Centre Street lofts, a five-story mixed-use complex about 0.2 mile from the southern project site boundary at 3rd Street, the six-story 550 Harborfront apartment building and a 16-story apartment complex located 500 feet to south of the project site at the corner of Palos Verdes Street and 5th Street, and the four-story multi-family residential building currently being constructed immediately west of the 327 Harbor Site at 345 Beacon Street. Elsewhere, buildings as high as eight stories offer offices and other uses to the south and southwest of the project site. The proposed development at the OSP Specific Plan Site and 327 Harbor Site would feature modern, urban design elements and increased density, consistent with the ongoing development in the project area. Additionally, the Proposed Project Alternative would include a variety of design elements and features that are consistent with the existing local policies governing scenic quality, as described in Section 4.1.3. Although the Proposed Project Alternative would result in substantial changes to the existing visual character and quality of the project site, these changes would largely be beneficial. Therefore, the Proposed Project Alternative would result in less than significant direct and indirect impacts to aesthetics and visual quality.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

Rehabilitation activities on the OSP Specific Plan Site under the Historic Rehabilitation Alternative would generally involve the use of small hand and power tools typically used for housing renovation. Therefore, rehabilitation activities on the OSP Specific Plan Site under this alternative would result in no impact to visual quality. During construction at the 327 Harbor Site, heavy equipment, construction fencing, and other components used to complete construction tasks and ensure site safety would be present on the project site. While large equipment and other construction components would alter the visual quality in the area for the limited duration of construction, it would not affect visual quality

over the long term. Construction would be required to comply with all City regulations that govern construction activities, including trash removal and equipment storage to reduce visual impacts. Furthermore, construction would not affect the scenic resources identified above or public views of these resources in any direction due to the distance, intervening development, and orientation of the project site relative to scenic vistas. Views from Harbor Boulevard east toward the Pacific Ocean, north toward the Vincent Thomas Bridge, and south toward the Ports O' Call Village would not be affected by construction of the Historic Rehabilitation Alternative as all activity would occur west of the roadway. Construction impacts would be further reduced through the installation of screening at the 327 Harbor Site that would shield outside views of construction areas, in compliance with Mitigation Measure AES-1 included in Section 4.1.3. Because of its temporary nature, construction of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts to aesthetic resources and visual quality.

OPERATIONAL EFFECTS

The Historic Rehabilitation Alternative would not involve development of new buildings or other alterations to the existing visual character of the OSP Specific Plan Site, and therefore, would not result in operational changes to scenic vistas, visual resources, and scenic quality at the OSP Specific Plan Site compared to existing conditions.

At the 327 Harbor Site, the Historic Rehabilitation Alternative would build a 66,210-sf, four-story residential building with new landscaping and public art. The 327 Harbor Site is located west of Harbor Boulevard and would not interfere with views from that roadway toward the Ports O' Call Village, the Vincent Thomas Bridge, or the Pacific Ocean beyond. Even at lower heights (two- to three-stories), existing development largely blocks views toward the western foothills of the Palos Verdes peninsula, with only interim views occurring along the east/west-oriented streets. Development of the 327 Harbor Site under the Historic Rehabilitation Alternative would not affect views of the western foothills of the Palos Verdes Peninsula from nearby east/west oriented streets. Refer to Section 4.1.3 for representative images of public views of these scenic resources from roadways surrounding the project site.

The design and layout of the proposed building at the 327 Harbor Site would be centered around a courtyard. The building would feature a modern, rectilinear architectural style common of other multi-family and mixed-use residential communities currently under construction or recently constructed in the San Pedro area. Proposed building materials would consist of durable materials, including composite panels, perforated metal panels, and cement plaster. The design incorporates a white, gray, and blue color scheme reflective of the ocean/marine environment. The building would feature murals and/or artwork from local artists, balconies, and variations in exterior surfaces to provide visual interest. The project would also add new landscaping along the building frontages, including street trees, grasses, and shrubbery to improve the pedestrian environment. Refer to Section 4.1.3 for representative images of the proposed development at the 327 Harbor Site. The Historic Rehabilitation Alternative would replace a vacant and unmaintained site with new, active uses featuring a contemporary design consistent with other development in the area, thereby improving the visual quality of the 327 Harbor Site. Although the Historic Rehabilitation Alternative would result in substantial changes to the existing visual character and quality of the 327 Harbor Site, these changes would largely be beneficial. Therefore, the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts to aesthetics and visual quality.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

During construction, heavy equipment, construction fencing, and other components used to complete construction tasks and ensure site safety would be present on the project site. While large equipment and other construction components would alter the visual quality in the area for the limited duration of construction, it would not affect visual quality over the long term. Construction would be required to comply with all City regulations that govern construction activities, including trash removal and equipment storage to reduce visual impacts. Furthermore, construction would not affect the scenic resources identified above under *Affected Environment* or public views of these resources in any direction due to the distance, intervening development, and orientation of the project site relative to scenic vistas. Views from Harbor Boulevard east toward the Pacific Ocean, north toward the Vincent Thomas Bridge, and south toward the Ports O' Call Village would not be affected by construction of the Partial Preservation Alternative as all activity would occur west of the roadway. Construction impacts would be further reduced through the installation of screening that would shield outside views of construction areas, in compliance with Mitigation Measure AES-1 included in Section 4.1.3. Because of its temporary nature, construction of the Partial Preservation Alternative would result in less than significant direct and indirect impacts to aesthetic resources and visual quality.

OPERATIONAL EFFECTS

As described above under *Affected Environment*, the project site is characterized by low visual quality under existing conditions. Refer to Section 4.1.3 for representative images of the project site. On the OSP Specific Plan Site, the Partial Preservation Alternative would rehabilitate 284 existing residential units, demolish 194 existing residential units, and construct 923 new residential units along with new commercial retail and Neighborhood Serving Uses. The 327 Harbor Site would be developed with a four-story residential building. Rehabilitation of the original portion of Rancho San Pedro would include repairing damaged façades and modernizing the building interiors, and the rehabilitated portion of the project site would appear nearly identical to existing conditions. On redeveloped portions of the OSP Specific Plan Site, the Partial Preservation Alternative would include buildings of varied heights with contemporary architectural finishes. The architecture, landscaping, lighting, and signage of the redeveloped portions of the OSP Specific Plan Site would be similar to those described under the Proposed Project Alternative.

The project site is located west of Harbor Boulevard and would not interfere with views from that roadway toward the Ports O' Call Village, the Vincent Thomas Bridge, or the Pacific Ocean beyond. Even at lower heights (two- to three-stories), existing development largely blocks views toward the western foothills of the Palos Verdes peninsula, with only interim views occurring along the east/west-oriented streets. These views would remain, in large part but would be framed by the redeveloped buildings under the Partial Preservation Alternative. From Palos Verdes Street looking northeast, the Vincent Thomas Bridge is not visible due to intervening development. Refer to Section 4.1.3 for representative images of public views of these scenic resources from roadways surrounding the project site. Implementation of the Partial Preservation Project would not change these conditions and impacts to views of scenic resources would be less than significant.

On the preserved portions of the OSP Specific Plan Site, the visual character would remain consistent with current conditions. On the redeveloped portions of the OSP Specific Plan Site, buildings of varied heights with changes in massing and building orientation, contemporary architectural finishes, and

new landscaping would be provided, similar to the design of those same portions of the project site under the Proposed Project Alternative. The design and layout of the proposed building at the 327 Harbor Site would be centered around a courtyard. The building would feature a modern, rectilinear architectural style common of other multi-family and mixed-use residential communities currently under construction or recently constructed in the San Pedro area. Proposed building materials would consist of durable materials, including composite panels, perforated metal panels, and cement plaster. The design incorporates a white, gray, and blue color scheme reflective of the ocean/marine environment. The building would feature murals and/or artwork from local artists, balconies, and variations in exterior surfaces to provide visual interest. The project would also add new landscaping along the building frontages, including street trees, grasses, and shrubbery to improve the pedestrian environment. Refer to Section 4.1.3 for representative images of the proposed development at the 327 Harbor Site.

The project site is adjacent to newer, high-rise developments with a more pronounced urban design than the existing development, where the structural features like I-beams are visible and serve as ornamental detailing. Increases in density have been occurring throughout the area with implementation of the San Pedro Community Plan. These include the Centre Street lofts, a five-story mixed-use complex about 0.2 mile from the southern project site boundary at 3rd Street, the six-story 550 Harborfront apartment building and a 16-story apartment complex located 500 feet to south of the project site at the corner of Palos Verdes Street and 5th Street, and the four-story multi-family residential building currently being constructed immediately west of the 327 Harbor Site at 345 Beacon Street. Elsewhere, buildings as high as eight stories offer offices and other uses to the south and southwest of the project site. The redeveloped portions of the OSP Specific Plan Site and 327 Harbor Site would feature modern, urban design elements and increased density, consistent with the ongoing development in the project area. Although the Partial Preservation Alternative would result in substantial changes to the existing visual character and quality of the project site, these changes would largely be in line with existing development in the area and would improve the visual quality of the project site. Therefore, the Partial Preservation Alternative would result in less than significant direct and indirect impacts to aesthetics and visual quality.

Cumulative Impacts

Although aesthetic and visual impacts are generally site-specific, impacts that may affect scenic vistas or recognized visual resources can influence a broader area. As discussed in Section 3.4, *Cumulative Development*, 12 cumulative projects have been identified in the vicinity of the project site. Projects in the cumulative list consist of renovations to existing one-story industrial uses, changing existing office and service use buildings into residential units, and construction of new mixed-use developments with buildings up to six stories, as listed in Section 3, *Environmental Setting*. The closest project to the OSP Specific Plan Site would occur at 111 North Harbor Boulevard, immediately to the east of the northeastern most project block of the OSP Specific Plan Site and would include construction of a seven-story mixed-use apartment building (Sharp 2019). Similarly, the planned project at 511 South Harbor Boulevard, approximately 500 feet south of the southeasternmost project boundary, would involve construction of an eight-story, mixed-used building with apartments, retail, and restaurant use (City of Los Angeles 2020). The closest project to the 327 Harbor Site would occur immediately to the west of the site, where a four-story mixed-use residential building is under construction. Other proposed projects in the vicinity include a hotel, a condominium building, and a variety of mixed-use developments.

As all the cumulative projects occur west of Harbor Boulevard, they would not interfere with scenic views of the Pacific Ocean, the Ports O' Call Village, the Vincent Thomas Bridge, and John S. Gibson

Junior Park and the Fisherman Industry Memorial from this roadway. Views of the western foothills of the Palos Verdes peninsula are identified as scenic resources in the project area. Existing development in the project vicinity largely blocks views toward the western foothills of the Palos Verdes peninsula, with only interim views occurring along the east/west-oriented streets. These views would remain available from east/west-oriented streets in the project vicinity, as the project alternatives and other cumulative development projects are infill projects that adhere to the existing city block configurations. Therefore, cumulative impacts related to scenic vistas and visual resources would be cumulatively less than significant, and the project alternatives would result in less than significant cumulative impacts to scenic and visual resources.

All cumulative projects would be subject to the same requirements as the project alternatives including the design guidelines and regulatory compliance presented herein. The cumulative projects identified in the project vicinity would replace aging buildings with modern structures and largely cohere with the general revitalization efforts in the area designed to transform aging and underutilized buildings into community serving and residential uses. Therefore, cumulative development in the project vicinity would result in less than significant cumulative impacts related to visual character and quality, and the project alternatives would not contribute to a potential cumulative impact that would constitute a degradation of visual quality in the project area.

7.4.3 Air Quality

This section analyzes the potential impacts of the project alternatives on ambient air quality in the project area. Ambient air quality may be affected by air pollutant emissions generated from stationary and mobile sources associated with the project. Air quality impacts may be direct, consisting of emissions generated by stationary sources installed on the project site, or indirect, consisting of emissions from existing stationary sources (e.g., power plant generating emissions for electrical sources).

Affected Environment

As discussed in Section 4.2, *Air Quality*, the project site is within the South Coast Air Basin, which is in extreme nonattainment for the National Ambient Air Quality Standards (NAAQS) for 8-hour ozone and serious nonattainment for fine particulate matter (PM_{2.5}). The Los Angeles County portion of the South Coast Air Basin is also in nonattainment for the NAAQS for lead; however, the proposed project and project alternatives would not result in lead emissions, and lead is not discussed further. The South Coast Air Basin is in attainment (maintenance) for carbon monoxide and small particulate matter (PM₁₀). For additional details regarding existing air quality conditions, the reader is referred to Section 4.2.1.

Regulatory Setting

The following laws, regulations, and plans applicable to air quality are discussed in Section 4.2.2:

- Federal Clean Air Act
- California Construction Equipment Fuel Efficiency Standard
- California State Implementation Plan (SIP)

Additionally, the California Code of Regulations (CCR) Title 24, the California Building Standards, are applicable to air quality, and are discussed in Section 4.5.2.

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to air quality are provided in Table 7-3.

Table 7-3 Air Quality Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	- Would not result in emissions that exceed <i>de minimis</i> levels or conflict with applicable air quality plans - Would not result in potential direct human health risks for sensitive populations, such as children and the elderly - Would not generate fugitive emissions
	Indirect Effect	- Would not induce emissions outside of the study area that would exceed <i>de minimis</i> levels or conflict with applicable air quality plans - Would not produce indirect human health risks for sensitive populations
	Applies to All Effect Types	- Would not result in discernable changes to air quality in the region or locality - Would only alter air quality for an indiscernible or negligible period of time
Less Than Significant	Direct Effect	- Would result in negligible emissions of criteria pollutants within an attainment area, and would not cause a NAAQS exceedance, change the category of non-attainment status, or conflict with applicable air quality plans - Would result in negligible emissions of hazardous air pollutants, and would not exceed major source thresholds or health benchmarks, or conflict with applicable air quality plans - Would result in minimal amounts of fugitive emissions - Would result in minimal direct human health risks for sensitive populations
	Indirect Effect	- Would induce negligible emissions indirectly outside of the study area that would not exceed <i>de minimis</i> levels, change the category of non-attainment status, or conflict with applicable air quality plans - Would induce negligible emissions of hazardous air pollutants indirectly outside the study area but would not exceed major source thresholds or health benchmarks, or conflict with applicable air quality plans - Would not produce indirect human health risks for sensitive populations
	Applies to All Effect Types	- Air quality conditions would only be altered for a short, finite period - Impacts would be temporary and localized in specific areas, and would not substantially affect regional conditions
Potentially Significant	Direct Effect	- Would result in emission levels that could exceed <i>de minimis</i> levels, change attainment status of the study area, or conflict with applicable air quality plans - Would result in emissions of hazardous air pollutants that exceed major source thresholds or health benchmarks, or conflict with applicable air quality plans - Would result in fugitive emissions that would cause visibility issues - Would result in direct human health risks for sensitive populations
	Indirect Effect	- Would induce emission levels outside the study area that could exceed <i>de minimis</i> levels, change attainment status, or conflict with applicable air quality plans - Would induce emissions of hazardous air pollutants indirectly outside the study area that exceed major source thresholds or health benchmarks, or conflict with applicable air quality plans - Would produce indirect human health risks on sensitive populations

Impact Level	Type of Effect	Impact Description
	Applies to All Effect Types	- Would result in a substantial, short- or long-term impact on local or regional air quality - Impact would be long-term and adverse, and/or could substantially affect regional air quality
Beneficial	Direct Effect	Would result in improvements to air quality, including reductions of emissions, in the study area
	Indirect Effect	Would induce improvements to air quality, including reductions of emissions, outside of the study area
	Applies to All Effect Types	Would result in air quality benefits observed throughout affected communities or regions

Projects funded by HUD must demonstrate that they conform to the appropriate SIP to show compliance with the NAAQS.

HUD's guidance for assessing significant impacts related to air quality is to consider:

1. Does the project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Federal projects must conform to Clean Air Act requirements if they may constitute a significant new source of air pollution. If the project does not involve new construction or conversion of land use as indicated above, it can be assumed that its emissions are below *de minimis* levels and the project is in compliance with the Act.

2. If so, is the project's county or air quality management district in nonattainment or maintenance status for any criteria pollutants?

If the project's county or air quality management district is in attainment status for all criteria pollutants, the project is in compliance with the Clean Air Act. Otherwise, determine which criteria pollutants are in nonattainment or maintenance status and proceed to Step 3.

3. If so, do estimated emissions levels for your project exceed *de minimis* emissions levels for the nonattainment or maintenance level pollutants?

In a nonattainment or maintenance area, a conformity determination is required for each pollutant where the project's total direct and indirect emissions exceed *de minimis* levels. Federal air quality regulations are promulgated by the U.S. EPA, which establishes federal *de minimis* levels based on the severity of nonattainment for NAAQS. Based on the attainment status of the South Coast Air Basin, the *de minimis* levels applicable to the project alternatives are shown in Table 7-4.

If the project's estimated emissions levels are below *de minimis* levels for all nonattainment or maintenance pollutants, the project is in compliance with the Clean Air Act.

4. If the estimated emissions levels exceed *de minimis* levels, determine whether the project can be brought into compliance with the SIP through modification or mitigation.

If the project cannot be brought into compliance with the SIP, it cannot proceed as designed.

Table 7-4 General Conformity De Minimis Levels for South Coast Air Basin

Pollutant	Emissions Threshold (tons per year)
NO _x	10
VOC	10
PM _{2.5}	70
PM ₁₀	100
CO	100

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; PM₁₀ = particulate matter with a diameter of 10 microns or less; CO = carbon monoxide

Source: U.S. EPA 2022

The methodology used to evaluate potential direct and indirect effects of the project alternatives to local and regional air quality are included in Section 4.2.3. As described therein, criteria pollutant emissions for construction and operation of the proposed project were calculated using the California Emissions Estimator Model (CalEEMod), Version 2020.4.0. Output files for the project are included in Appendix B. For additional details of methodology and project design features, the reader is referred to Section 4.2, *Air Quality*.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve any construction activities or alter any existing on-site uses of the project site. The No Project Alternative would not generate additional emissions beyond those generated under existing conditions. Therefore, the No Project Alternative would not contribute to an exceedance of criteria pollutants listed in the NAAQS or result in potential direct or indirect health impacts to sensitive receptors. As such, the No Project Alternative would result in no direct or indirect impacts to air quality.

Proposed Project Alternative

CONSTRUCTION EFFECTS

Construction emissions include criteria pollutant emissions generated by construction equipment use on site and by vehicle trips associated with construction such as worker and vendor trips. As described in detail in Section 4.2.3, under both development scenarios of the Proposed Project Alternative, the footprint of development would be identical, and construction and grading activities would be the same for all construction phases except architectural coating. The equipment and timing of each phase would remain the same regardless of scenario; however, as the number of units constructed for each Phase would change between Scenario A and Scenario B, the amount of VOC emissions from architectural coating activities would vary slightly between the two scenarios. All other construction emissions would be identical.

As described in Section 4.2.3, the Proposed Project Alternative would comply with SCAQMD Rules 403 and 1103, which include measures to minimize fugitive dust (PM₁₀ and PM_{2.5}) emissions and VOC emissions associated with architectural coatings during construction. Table 7-5 provides the criteria

pollutant emissions for construction of either scenario of the Proposed Project Alternative. As illustrated therein, the federal *de minimis* levels would not be exceeded.

Table 7-5 Proposed Project Alternative Construction Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	1	1	<1	<1
OSP Specific Plan Site Phase 1	1	9	13	1	<1
OSP Specific Plan Site Phase 2	2	6	13	1	<1
OSP Specific Plan Site Phase 3	2	5	11	1	<1
327 Harbor Site + OSP Specific Plan Site Phase 1	1	9	13	1	<1
OSP Specific Plan Site Phase 2 + OSP Specific Plan Site Phase 3	3	9	18	1	1
Maximum Annual Emissions	3	9	18	1	1
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than
 Note: Totals may not add up correctly due to rounding
 Source: Appendix B

The Proposed Project Alternative would also implement Mitigation Measure AQ-1, included in Section 4.2, *Air Quality*, which would further serve to reduce criteria pollutant emissions during construction. Additionally, as discussed in detail in Section 4.2, *Air Quality*, construction emissions would not result in significant health impacts to nearby sensitive receptors, including children. As such, short-term direct and indirect construction impacts to air quality would be less than significant.

OPERATIONAL EFFECTS

Operational sources of air pollutant emissions include area sources (e.g., landscaping equipment, fireplaces, consumer products, etc.), energy use (e.g., natural gas consumption), and mobile sources (e.g., vehicle trips). Under both development scenarios of the Proposed Project Alternative, the footprint of development would be identical, resulting in the same amount of total growth. However, as the number of residential units and area of Commercial Retail and Neighborhood Serving uses would change between Phases under Scenario A and Scenario B, the operational emissions by Phase would vary slightly between the two scenarios.

Table 7-6 provides the criteria pollutant emissions for operation of the two Proposed Project Alternative scenarios. As illustrated therein, the federal *de minimis* levels would not be exceeded.

Table 7-6 Proposed Project Alternative Annual Operational Criteria Pollutant Emissions (tons per year)

	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Scenario A					
327 Harbor Site	0.4	0.1	1.5	0.2	0.1
OSP Specific Plan Site Phase 1	3.1	1.2	15.5	3.1	0.8
OSP Specific Plan Site Phase 2	4.9	1.8	24.0	5.1	1.4
OSP Specific Plan Site Phase 3	4.6	1.6	21.8	4.5	1.2
Total Operational Emissions – Scenario A	13.0	4.8	62.8	12.8	3.5
Scenario B					
327 Harbor Site	0.4	0.1	1.5	0.2	0.1
OSP Specific Plan Site Phase 1	3.8	1.5	18.6	3.7	1.0
OSP Specific Plan Site Phase 2	5.6	2.1	27.7	5.9	1.6
OSP Specific Plan Site Phase 3	3.2	1.1	15.1	3.0	0.8
Total Operational Emissions – Scenario B	13.0	4.8	62.9	12.8	3.5
Maximum Annual Emissions	13.0	4.8	62.9	12.8	3.5
<i>Existing</i>	3.2	1.7	17.3	2.6	0.7
Net Operational	9.8	3.1	45.6	10.2	2.8
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No
NO _x = nitrogen oxides; VOC = volatile organic compounds; PM ₁₀ = particulate matter with a diameter of 10 microns or less; PM _{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; <= less than Note: Totals may not add up correctly due to rounding. Source: Appendix B					

As discussed in Section 4.3.3, under both scenarios, development of the Proposed Project Alternative would result in the construction of later phases while initial phases are operational. Table 7-7 summarizes the estimated maximum daily emissions where construction and operational activities overlap. As illustrated therein, the federal *de minimis* levels would not be exceeded.

Table 7-7 Proposed Project Alternative Combined Annual Construction and Operational Criteria Pollutant Emissions (tons per year)

Plan Area ¹	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Scenario A (tons/year)					
Construction of OSP Specific Plan Site Phases 2 and 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1					
Construction of OSP Specific Plan Site Phases 2 and 3	3	9	18	1	1
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	4	1	17	3	1
Total	6	10	35	5	1
Construction of OSP Specific Plan Site Phase 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2					
Construction of OSP Specific Plan Site Phase 3	2	5	11	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	8	3	41	8	2
Total	11	8	52	9	2
Scenario B (tons/year)					
Construction of OSP Specific Plan Site Phases 2 and 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1					
Construction of OSP Specific Plan Site Phases 2 and 3	3	9	18	1	1
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	4	2	20	4	1
Total	7	10	38	5	2
Construction of OSP Specific Plan Site Phase 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2					
Construction of OSP Specific Plan Site Phase 3	2	5	11	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	10	4	48	10	3
Total	11	9	59	11	3
Overall Project (tons/year)					
Max Scenario A	11	10	52	9	2
Max Scenario B	11	10	59	11	3
<i>Existing</i>	3	2	17	3	1
Net Scenario A	7	8	35	6	1
Net Scenario B	8	9	42	8	2
<i>De Minimis Levels</i>	10	10	100	100	70
Exceed Threshold?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide

Note: Totals may not add up correctly due to rounding.

Source: See Appendix B

The Proposed Project Alternative would also implement Mitigation Measures AQ-1 and AQ-2, included in Section 4.2, *Air Quality*, to further reduce construction emissions and operational VOC emissions. Therefore, operation of the Proposed Project Alternative would result in less than significant direct and indirect impacts related to criteria pollutant emissions and conformity with the NAAQS.

Industrial manufacturing processes, warehousing, ports, rail yards, refineries, chrome platers, gasoline dispensing facilities, automotive repair facilities, and dry-cleaning facilities are the typical land uses that result in exposure of sensitive receptors hazardous air pollutants. The Proposed Project Alternative would include a mixed-use development of residential, commercial retail, and Neighborhood Serving Uses that would not include any of these potential sources of hazardous air pollutants, although minimal emissions may result from the use of consumer products. The Proposed Project Alternative would generate minor amounts of diesel fuel emissions from infrequent delivery trucks (less than 100 trucks accessing the site per day) and intermittent maintenance activities. Proposed Project Alternative operations would result in minimal emissions of hazardous air pollutants from maintenance or other ongoing activities, such as from the use of architectural coatings (from maintenance of units) and other products. Given the land use type and activities anticipated, Proposed Project Alternative operation would not generate substantial hazardous air pollutants that could result in health impacts to sensitive receptors.

The California Air Resources Board (CARB) suggests an operational health risk assessment be conducted for developments resulting in sensitive receptors being placed within 500 feet of an existing high-volume roadway. A high-volume roadway is defined as an urban roadway with more than 100,000 vehicles per day (CARB 2005). The closest high-volume roadway to the project site is State Route 47, which is more than 1,000 feet north of the 327 Harbor Site (the northernmost project parcel). Therefore, the Proposed Project Alternative would not place new sensitive receptors within 500 feet of a high-volume roadway. In addition, CCR Title 24 standards would require new residential units to include MERV 13 standard air filtration (at a minimum), which would reduce indoor PM₁₀ and PM_{2.5} levels by at least 70 percent. Therefore, new residents are not anticipated to be adversely affected by exposure to long-term vehicle exhaust.

In summary, operational emissions would not exceed the federal *de minimis* levels and direct and indirect impacts related to conformity with the NAAQS would be less than significant. Operation of the Proposed Project Alternative would not generate hazardous air pollutants that would result in substantial health risks to nearby sensitive receptors. Additionally, the proposed project would not site new sensitive land uses within 500 feet of a high-volume roadway and future residents would not be exposed to significant traffic-related pollutants and associated health risks. Therefore, operation of the Proposed Project Alternative would result in less than significant direct and indirect impacts related to exposure of sensitive receptors to hazardous air pollutants. Operational air quality impacts would be less than significant.

MITIGATION

Although impacts to air quality under the Proposed Project Alternative would be less than significant under NEPA, the project Applicant would be required to implement Mitigation Measures AQ-1 and AQ-2 from Section 4.2, *Air Quality*.

AQ-1 Construction Equipment:

The project applicant shall ensure the following requirements are incorporated into applicable bid documents, purchase orders, and contracts. Contractors shall confirm the ability to supply the compliant construction equipment prior to any ground-disturbing and construction activities:

- Mobile off-road construction equipment (wheeled or tracked) greater than 50 horsepower (hp) used during construction of the project shall meet the U.S. EPA Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, the equipment shall, at a minimum, meet the Tier 3 standards. Zero-emissions construction equipment may be incorporated in lieu of Tier 4 final equipment. A copy of each equipment's certified tier specification or model year specification shall be available upon request at the time of mobilization of each piece of equipment.
- Mobile off-road construction equipment less than 50 hp used during construction of the project shall be electric or other alternative fuel type. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment.
- Electric hook-ups to the power grid shall be used instead of temporary diesel- or gasoline-powered generators, whenever feasible. If generators need to be used, the generators shall be non-diesel generators.

AQ-2 Landscaping Equipment Electrification:

The project shall include a minimum of 25 percent electric landscaping equipment use in all contracts for landscaping services to be rendered on site. This requirement shall be added to the Master Development Agreement between HACLA and the project Applicant.

SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measure AQ-1 would further reduce less than significant construction emissions below the *de minimis* levels, as shown in Table 7-8.

Table 7-8 Proposed Project Alternative Mitigated Construction Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	<1	1	<1	<1
OSP Specific Plan Site Phase 1	1	2	13	1	<1
OSP Specific Plan Site Phase 2	2	2	12	1	<1
OSP Specific Plan Site Phase 3	2	2	10	1	<1
327 Harbor Site and OSP Specific Plan Site Phase 1	<1	2	13	1	<1
OSP Specific Plan Site Phases 2 and 3	2	3	17	1	<1
Maximum Annual Emissions	2	3	17	1	<1
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than

Note: Totals may not add up correctly due to rounding

Source: Appendix B

Likewise, implementation of Mitigation Measure AQ-2 would further reduce the less than significant annual operational emissions and combined annual construction and operational emissions, as shown in Table 7-9 and Table 7-10.

Table 7-9 Proposed Project Alternative Annual Mitigated Operational Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Scenario A					
327 Harbor Site	0.4	0.1	1.3	0.2	0.1
OSP Specific Plan Site Phase 1	3.1	1.2	14.4	3.1	0.8
OSP Specific Plan Site Phase 2	4.8	1.8	22.2	5.1	1.4
OSP Specific Plan Site Phase 3	4.5	1.6	20.0	4.4	1.2
Total Operational Emissions – Scenario A	13.0	4.8	62.8	12.8	3.5
Scenario B					
327 Harbor Site	0.4	0.1	1.3	0.2	0.1
OSP Specific Plan Site Phase 1	3.7	1.5	17.2	3.7	1.0
OSP Specific Plan Site Phase 2	5.5	2.1	25.6	5.9	1.6
OSP Specific Plan Site Phase 3	3.2	1.1	13.8	3.0	0.8
Total Operational Emissions – Scenario B	13.0	4.8	62.9	12.8	3.5
Maximum Annual Emissions	13.0	4.8	62.9	12.8	3.5

Housing Authority of the City of Los Angeles and City of Los Angeles Housing Department
One San Pedro Specific Plan

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
<i>Existing</i>	3.2	1.7	17.3	2.6	0.7
Net Operational	9.8	3.1	45.6	10.2	2.8
<i>De Minimis Levels</i>	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; <= less than
 Note: Totals may not add up correctly due to rounding.
 Source: Appendix B

Table 7-10 Proposed Project Alternative Mitigated Annual Construction and Operational Overlap Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Scenario A (tons/year)					
Construction of OSP Specific Plan Site Phases 2 and 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1					
Construction of OSP Specific Plan Site Phases 2 and 3	2	3	17	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	3	1	16	3	1
Total	5	4	33	5	1
Construction of OSP Specific Plan Site Phase 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2					
Construction of OSP Specific Plan Site Phase 3	2	2	10	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	8	3	38	8	2
Total	10	5	48	9	2
Scenario B (tons/year)					
Construction of OSP Specific Plan Site Phases 2 and 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1					
Construction of OSP Specific Plan Site Phases 2 and 3	2	3	17	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	4	2	19	4	1
Total	6	5	36	5	1
Construction of OSP Specific Plan Site Phase 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2					
Construction of OSP Specific Plan Site Phase 3	1	2	10	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	10	4	44	10	3
Total	11	5	54	11	3
Overall Project (tons/year)					
Max Scenario A	10	5	48	9	2
Max Scenario B	11	5	54	11	3
<i>Existing</i>	3	2	17	3	1
Net Scenario A	7	3	31	6	1
Net Scenario B	8	4	37	8	2

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Threshold?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than

Note: Totals may not add up correctly due to rounding.

Source: Appendix B

As described above, construction and operation of the Proposed Project Alternative would result in less than significant impacts related to conformity with the NAAQS and exposure of sensitive receptors to hazardous air pollutants and related health risks. Therefore, the Proposed Project Alternative would result in less than significant impacts related to air quality.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

The Historic Rehabilitation Alternative has the potential to create air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated from construction workers traveling to and from the project site. The Historic Rehabilitation Alternative would comply with SCAQMD Rules 403 and 1113, which would minimize fugitive dust (PM₁₀ and PM_{2.5}) and VOC emissions during construction. Table 7-11 provides the annual criteria pollutant emissions for construction of the Historic Rehabilitation Alternative. As illustrated therein, the federal *de minimis* levels would not be exceeded.

Table 7-11 Historic Rehabilitation Alternative Annual Construction Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	1	1	<1	<1
OSP Specific Plan Site Phase 1	1	3	3	<1	<1
OSP Specific Plan Site Phase 2	1	3	3	<1	<1
OSP Specific Plan Site Phase 3	1	2	3	<1	<1
Maximum Annual Emissions	1	3	3	<1	<1
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than

Note: Totals may not add up correctly due to rounding.

Source: Appendix B

Construction activities associated with the Historic Rehabilitation Alternative would be well below General Conformity *de minimis* levels. The Historic Rehabilitation Alternative would also implement Mitigation Measure AQ-1, included in Section 4.2, *Air Quality*, which would further serve to reduce criteria pollutant emissions during construction. The relatively minor construction activities

associated with rehabilitation of the existing buildings on the OSP Specific Plan Site and development of the 47-unit residential building at the 327 Harbor Site would not produce air pollutant emissions that would result in significant health impacts to nearby sensitive receptors. As such, construction of the Historic Rehabilitation Alternative would result in less than significant direct and indirect short-term construction impacts to air quality.

OPERATIONAL EFFECTS

Table 7-12 provides the annual criteria pollutant emissions during operation of the Historic Rehabilitation Alternative. As illustrated therein, the federal *de minimis* levels would not be exceeded.

Table 7-12 Historic Rehabilitation Alternative Annual Operational Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	<1	2	<1	<1
OSP Specific Plan Site	3	2	17	3	1
Total Operational Emissions	3	2	19	3	1
<i>Existing</i>	3	2	17	3	1
Net Operational Emissions	<1	<1	2	<1	<1
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than
 Note: Totals may not add up correctly due to rounding.
 Source: Appendix B

Industrial manufacturing processes, warehousing, ports, rail yards, refineries, chrome platers, gasoline dispensing facilities, automotive repair facilities, and dry-cleaning facilities are the typical land uses that result in exposure of sensitive receptors hazardous air pollutants. The Historic Rehabilitation Alternative would include residential uses only, although minimal emissions may result from the typical use of consumer products. The Historic Rehabilitation Alternative would generate minor amounts of diesel fuel emissions from infrequent delivery trucks (less than 100 trucks accessing the site per day) and intermittent maintenance activities. Historic Rehabilitation Alternative operations would result in minimal emissions of hazardous air pollutants from maintenance or other ongoing activities, such as from the use of architectural coatings (from maintenance of units) and other products. Given the land use type and activities anticipated, the Historic Rehabilitation Alternative operation would not generate substantial hazardous air pollutants that could result in health impacts to sensitive receptors, including children.

As described above under the Proposed Project Alternative, the project site is not within close proximity to a high-volume roadway. Therefore, the Historic Rehabilitation Alternative would not site new sensitive receptors in a location where traffic-related pollutants could result in significant health risks. In addition, CCR Title 24 standards would require new residential units to include MERV 13 standard air filtration (at a minimum), which would reduce indoor PM₁₀ and PM_{2.5} levels by at least 70 percent. Therefore, new residents are not anticipated to be adversely affected by exposure to long-term vehicle exhaust.

In summary, operational emissions associated with the Historic Rehabilitation Alternative would not exceed the federal *de minimis* levels and direct and indirect impacts related to conformity with the NAAQS would be less than significant. Operation of the Historic Rehabilitation Alternative would not generate air pollutants that would result in substantial health risks to nearby sensitive receptors. Additionally, the Historic Rehabilitation Alternative would not site new sensitive land uses within 500 feet of a high-volume roadway and future residents would not be exposed to significant traffic-related pollutants and associated health risks. Therefore, operation of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts related to exposure of sensitive receptors to air pollutants. Overall, operational air quality impacts would be less than significant.

MITIGATION

Although impacts to air quality under the Historic Rehabilitation Alternative would be less than significant under NEPA, the project Applicant would be required to implement Mitigation Measure AQ-1 from Section 4.2, *Air Quality*.

SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measure AQ-1 would further reduce less than significant construction emissions below the *de minimis* levels, as shown in Table 7-13.

Table 7-13 Historical Rehabilitation Alternative Mitigated Annual Construction Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	<1	1	<1	<1
OSP Specific Plan Site Phase 1	<1	1	3	<1	<1
OSP Specific Plan Site Phase 2	<1	1	3	<1	<1
OSP Specific Plan Site Phase 3	<1	1	3	<1	<1
Maximum Annual Emissions	<1	1	3	<1	<1
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than

Note: Totals may not add up correctly due to rounding.

Source: Appendix B

As described above, construction and operation of the Historic Rehabilitation Alternative would result in less than significant impacts related to conformity with the NAAQS and exposure of sensitive receptors to hazardous air pollutants and related health risks. Therefore, the Historic Rehabilitation Alternative would result in less than significant impacts related to air quality.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

The Partial Preservation Alternative has the potential to create air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated from construction workers traveling

to and from the project site. The Partial Preservation Alternative would comply with SCAQMD Rules 403 and 1113, which include measures to minimize fugitive dust (PM₁₀ and PM_{2.5}) emissions and VOC emissions associated with architectural coatings during construction. Table 7-14 provides the annual criteria pollutant emissions for construction of the Partial Preservation Alternative. As illustrated therein, the federal *de minimis* levels would not be exceeded.

Table 7-14 Partial Preservation Alternative Annual Construction Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	1	1	<1	<1
OSP Specific Plan Site Phase 1	2	7	10	1	<1
OSP Specific Plan Site Phase 2	1	6	7	1	<1
OSP Specific Plan Site Phase 3	2	5	8	1	<1
327 Harbor Site and OSP Specific Plan Site Phase 1	1	8	11	1	<1
OSP Specific Plan Site Phases 1 and 2	1	6	8	1	<1
OSP Specific Plan Site Phases 2 and 3	2	7	11	1	<1
Maximum Annual Emissions	2	8	11	1	<1
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than
 Note: Totals may not add up correctly due to rounding.
 Source: Appendix B

Construction activities associated with the Partial Preservation Alternative would be below General Conformity *de minimis* levels. Therefore, impacts to human health and sensitive populations from criteria pollutant emissions during construction of the Partial Preservation Alternative would be less than significant. Construction of the Partial Preservation Alternative would result in less than significant direct and indirect short-term impacts to air quality.

OPERATIONAL EFFECTS

Table 7-15 provides the annual criteria pollutant emissions during operation of the Partial Preservation Alternative. As illustrated therein, the federal *de minimis* levels would not be exceeded.

Table 7-15 Partial Preservation Alternative Annual Operational Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	1	1	<1	<1
OSP Specific Plan Site Phase 1	3	2	20	4	1
OSP Specific Plan Site Phase 2	3	1	14	3	1
OSP Specific Plan Site Phase 3	3	2	19	4	1
Total Operational Emissions	10	5	54	11	3
<i>Existing</i>	3	2	17	3	1
Net Operational Emissions	7	3	37	8	2
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than

Note: Totals may not add up correctly due to rounding.

Source: Appendix B

Development of the Partial Preservation Alternative would result in the construction of later phases while initial phases are operational. Table 7-16 summarizes the estimated maximum daily emissions where construction and operational activities overlap. As illustrated therein, the federal *de minimis* levels would not be exceeded.

Table 7-16 Partial Preservation Alternative Annual Construction and Operational Overlap Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Construction of OSP Specific Plan Site Phases 2 and 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1					
Construction of OSP Specific Plan Site Phases 2 and 3	2	7	11	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	4	3	21	4	1
Total	6	10	32	5	1
Construction of OSP Specific Plan Site Phase 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2					
Construction of OSP Specific Plan Site Phase 3	2	5	8	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	6	4	35	7	2
Total	8	9	43	8	2
Max Emissions	8	10	43	8	2
<i>Existing</i>	3	2	17	3	1
Net Emissions	5	8	25	5	1
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Threshold?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Note: Totals may not add up correctly due to rounding.					
Source: See Appendix B					

The Partial Preservation Alternative would also implement Mitigation Measures AQ-1 and AQ-2, included in Section 4.2, *Air Quality*, to further reduce construction emissions and operational VOC emissions. Therefore, operation of the Partial Preservation Alternative would result in less than significant direct and indirect impacts related to criteria pollutant emissions and conformity with the NAAQS.

Industrial manufacturing processes, warehousing, ports, rail yards, refineries, chrome platers, gasoline dispensing facilities, automotive repair facilities, and dry-cleaning facilities are the typical land uses that result in exposure of sensitive receptors hazardous air pollutants. The Partial Preservation Alternative would include a mixed-use development of residential, commercial retail, and Neighborhood Serving Uses that would not include any of these potential sources of hazardous air pollutants, although minimal emissions may result from the typical use of consumer products. The Partial Preservation Alternative would generate minor amounts of diesel fuel emissions from infrequent delivery trucks (less than 100 trucks accessing the site per day) and intermittent maintenance activities. Operation of the Partial Preservation Alternative would result in minimal emissions of hazardous air pollutants from maintenance or other ongoing activities, such as from the use of architectural coatings (from maintenance of units) and other products. Given the land use type and activities anticipated, the Partial Preservation Alternative operation would not generate substantial hazardous air pollutants that could result in health impacts to sensitive receptors.

As described above under the Proposed Project Alternative, the project site is not within close proximity to a high-volume roadway. Therefore, the Partial Preservation Alternative would not site new sensitive receptors in a location where traffic-related pollutants could result in significant health risks. In addition, CCR Title 24 standards would require new residential units to include MERV 13 standard air filtration (at a minimum), which would reduce indoor PM₁₀ and PM_{2.5} levels by at least 70 percent. Therefore, new residents are not anticipated to be adversely affected by exposure to long-term vehicle exhaust.

In summary, operational emissions associated with the Partial Preservation Alternative would not exceed the federal *de minimis* levels and direct and indirect impacts related to conformity with the NAAQS would be less than significant. Operation of the Partial Preservation Alternative would not generate air pollutants that would result in substantial health risks to nearby sensitive receptors. Additionally, the Partial Preservation Alternative would not site new sensitive land uses within 500 feet of a high-volume roadway and future residents would not be exposed to significant traffic-related pollutants and associated health risks. Therefore, operation of the Partial Preservation Alternative would result in less than significant direct and indirect impact related to exposure of sensitive receptors to air pollutants. Overall, operational air quality impacts would be less than significant.

MITIGATION

Although impacts to air quality under the Partial Preservation Alternative would be less than significant under NEPA, the project Applicant would be required to implement Mitigation Measures AQ-1 and AQ-2 from Section 4.2, *Air Quality*.

SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measure AQ-1 would further reduce less than significant construction emissions below the *de minimis* levels, as shown in Table 7-17.

Table 7-17 Partial Preservation Alternative Mitigated Annual Construction Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	<1	1	<1	<1
OSP Specific Plan Site Phase 1	1	2	10	1	<1
OSP Specific Plan Site Phase 2	1	2	8	1	<1
OSP Specific Plan Site Phase 3	1	2	8	1	<1
327 Harbor Site + OSP Specific Plan Site Phase 1	<1	2	11	1	<1
OSP Specific Plan Site Phase 1 & OSP Specific Plan Site Phase 2	1	2	9	1	<1
OSP Specific Plan Site Phase 2 + OSP Specific Plan Site Phase 3	1	3	11	1	<1
Maximum Annual Emissions	1	2	11	1	<1
<i>De Minimis</i> Levels	10	10	100	100	70
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than

Note: Totals may not add up correctly due to rounding.

Source: Appendix B

Likewise, implementation of Mitigation Measure AQ-2 would further reduce the less than significant annual operational emissions and combined annual construction and operational emissions, as shown in Table 7-18 and Table 7-19.

Table 7-18 Partial Preservation Alternative Mitigated Annual Operational Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
327 Harbor Site	<1	1	1	<1	<1
OSP Specific Plan Site Phase 1	3	2	20	4	1
OSP Specific Plan Site Phase 2	3	1	14	3	1
OSP Specific Plan Site Phase 3	3	2	19	4	1
Total Operational Emissions	10	5	54	11	3
<i>Existing</i>	<i>3</i>	<i>2</i>	<i>17</i>	<i>3</i>	<i>1</i>
Net Operational Emissions	7	3	37	8	2
<i>De Minimis Levels</i>	<i>10</i>	<i>10</i>	<i>100</i>	<i>100</i>	<i>70</i>
Exceed Thresholds?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide; < = less than

Note: Totals may not add up correctly due to rounding.

Source: Appendix B

Table 7-19 Partial Preservation Alternative Mitigated Annual Construction and Operational Overlap Criteria Pollutant Emissions (tons per year)

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Construction of OSP Specific Plan Site Phases 2 and 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1					
Construction of OSP Specific Plan Site Phases 2 and 3	1	3	11	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	3	2	21	4	1
Total	5	5	32	5	1
Construction of OSP Specific Plan Site Phase 3; Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2					
Construction of OSP Specific Plan Site Phase 3	1	2	8	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	6	3	35	7	2
Total	7	5	43	8	2
Max Emissions	7	5	43	8	2
<i>Existing</i>	<i>3</i>	<i>2</i>	<i>17</i>	<i>3</i>	<i>1</i>
Net Emissions	4	4	26	5	1
<i>De Minimis Levels</i>	<i>10</i>	<i>10</i>	<i>100</i>	<i>100</i>	<i>70</i>
Exceed Threshold?	No	No	No	No	No

NO_x = nitrogen oxides; VOC = volatile organic compounds; PM₁₀ = particulate matter with a diameter of 10 microns or less; PM_{2.5} = particulate matter with a diameter of 2.5 microns or less; CO = carbon monoxide

Note: Totals may not add up correctly due to rounding.

Source: See Appendix B

As described above, construction and operation of the Partial Preservation Alternative would result in less than significant impacts related to conformity with the NAAQS and exposure of sensitive

receptors to hazardous air pollutants and related health risks. Therefore, the Partial Preservation Alternative would result in less than significant impacts related to air quality.

Cumulative Effects

As described in Section 4.2.4, the geographic scope for the cumulative air quality impact analysis is the South Coast Air Basin and as identified in Section 3.4, *Cumulative Development*, there are 12 cumulative projects within a 0.5-mile radius of the project site. Because the South Coast Air Basin is designated a nonattainment area for the federal ozone and PM_{2.5} standards, there is an existing adverse effect in the South Coast Air Basin relative to these pollutants and additional growth in the area has the potential to exacerbate the pollution and hinder the achievement of the NAAQS. Individual projects would cause a cumulatively considerable increase in emissions for which the South Coast Air Basin is in non-attainment if construction or operation of the individual project results in air pollutant emissions that exceed the *de minimis* levels. In addition, construction and operation of cumulative projects could result in hazardous air pollutant emissions that could result in health risks to nearby sensitive receptors.

Although potentially significant cumulative air quality impacts exist within the South Coast Air Basin, the No Project Alternative would result in no new air pollutant emissions and therefore would not result in a cumulatively considerable contribution to significant cumulative air quality impacts related to conformance with the NAAQS and exposure of sensitive receptors to hazardous air pollutants. Likewise, construction and operation of the other project alternatives would not result in air pollutant emissions that exceed the federal *de minimis* levels, and the project alternatives would not result in a cumulatively considerable contribution to significant cumulative air quality impacts related to conformance with the NAAQS. Construction and operational emissions of the project alternatives also would not generate substantial hazardous air pollutant emissions that could affect sensitive receptors. Therefore, the project build alternatives would result in less than significant contributions to cumulative air quality impacts.

7.4.4 Global Climate Change, Greenhouse Gas Emissions, and Sea Level Rise

Given the global nature of climate change and sea level rise, this impact analysis is framed differently than the other technical resource area analyses presented in this EIS. This analysis describes how each of the project alternatives would respond to and address global climate change and sea level rise.

This analysis discusses global climate change from the following two perspectives: (1) the potential effects of a proposed project on climate change as indicated by assessing GHG emissions; and (2) the effects of climate change on a proposed project and its environmental impacts. This section includes a GHG emissions analysis to assess potential impacts of the project on climate change. Further, the potential effects of climate change, in the form of sea level rise, on the project alternatives are also discussed. This section provides a summary of how each considered alternative would address or respond to changing climate and sea level conditions.

7.4.4.1 *Affected Environment*

As discussed in Section 4.5, *Greenhouse Gas Emissions*, global climate change refers to changes in average climatic conditions on the Earth as a whole, including changes in temperature, wind patterns, precipitation, and severe weather events. Global warming, a related concept, is the observed increase in average temperature of the Earth's surface and atmosphere. One identified cause of global

warming is an increase of GHGs in the atmosphere. GHGs are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include carbon dioxide (CO₂), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride¹⁰. Of these, CO₂ is the most abundant GHG in Earth's atmosphere.

The California Natural Resources Agency has produced climate change assessments which detail impacts of global warming in California. These impacts include:

- Sea level rise, coastal flooding, and erosion of California's coastlines would increase, as well as sea water intrusion.
- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply.
- Higher risk of forest fires resulting from increasing temperatures and making forests and brush drier. Climate change will affect tree survival and growth.
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes resulting in public health impacts.
- Habitat destruction and loss of ecosystems due to climate change affecting plant and wildlife habitats.
- Global warming can cause drought, warmer temperatures, and saltwater contamination resulting in impacts to California's agricultural industry (State of California 2022).

While all of these impacts of global climate change have the potential to affect the proposed project to some degree, sea level rise is of particular concern due to the project site's coastal location. The City of Los Angeles Sea Level Rise Vulnerability Study identifies the San Pedro/Port of Los Angeles area as one of the parts of the city vulnerable to sea level rise. In addition, San Pedro is among the most socially vulnerable coastal communities due to lower per capita income, lower education levels, linguistic isolation, older housing stock, and a high percentage of renters (Grifman et al. 2013).

According to the City of Los Angeles Sea Level Rise Vulnerability Study, modeling of the San Pedro area assuming a moderately severe 10-year flood plus 100 years of sea level rise shows that the project site and its immediate surroundings would not be anticipated to experience flooding (Grifman et al. 2013). Similarly, modeling completed as part of a more recent sea level rise study prepared for the Port of Los Angeles shows that under the worst-case scenario (66 inches of sea level rise by the year 2100 combined with a storm tide), the project site would not be anticipated to flood (AECOM 2018).

Regulatory Setting

The following laws, regulations, and plans applicable to GHG emissions, global climate change, and sea level rise are discussed in Section 4.5.2:

- Federal Clean Air Act
- Federal Corporate Average Fuel Economy Standards and Safer Affordable Fuel-Efficient Vehicles Rule
- Federal Energy Independence and Security Act

¹⁰ As defined by California AB 32 and SB 104.

- California Executive Orders S-3-05, B-30-15, and B-55-18
- California Global Warming Solutions Act of 2006 (California AB 32)
- California AB 197
- California Climate Change Scoping Plan (Scoping Plan) and the 2014, 2017, and 2022 Updates
- California Cap-and-Trade Program
- California Emission Performance Standards
- California Renewables Portfolio Standard
- Pavley Standards
- California Low Carbon Fuel Standard
- California Advanced Clean Cars Regulations
- California Sustainable Communities and Climate Protection Act (California Senate Bill [SB] 375)
- California Appliance Efficiency Regulations
- CCR Title 24, California Building Standards
- California Green Building Standards (CALGreen) Code (CCR Part 11 of Title 24)
- South Coast Air Quality Management District's (SCAQMD) CEQA Guidance
- SCAG 2020-2045 RTP/SCS
- City of Los Angeles Green New Deal (Sustainable City Plan 2019)
- City of Los Angeles Green Building Code
- City of Los Angeles Solid Waste Programs and Ordinances
- City of Los Angeles General Plan

Additional applicable California climate-related legislation and executive orders are included in Table 4.5-8 under Impact GHG-2 in Section 4.5.3 and include:

- California ABs 65, 1279, 1757, 2061, and 2127
- California SBs 27, 30, 100, 576, 596, 846, 905, 1020, 1075, 1137, and 1206
- California Executive Orders N-19-19, N-79-20, and N-82-20

Thresholds of Significance and Methodology

The significance criteria used to evaluate the potential effects from global climate change and sea level rise on each of the project alternatives are shown in Table 7-20. The less than significant impact level is not applicable to this technical resource area.

Table 7-20 Global Climate Change and Sea level Rise Impact Significance Criteria

Impact Level	Impact Description
No Impact	▪ Would not cause effects of ongoing global climate change and sea level rise ▪ Would not conflict with applicable plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change ▪ Would not alter existing GHG emissions ▪ Would not be affected by or increase risk of flooding due to storm surge or sea level rise
Less Than Significant	▪ Would increase existing GHG emissions but would generally be consistent with applicable plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change

	▪ Would address the potential effects of ongoing global climate change and sea level rise through project design and operational features ▪ Would potentially be affected by flooding due to storm surge or sea level rise but would include design features that minimize the risk and potential impacts of flooding
Potentially Significant	▪ Would conflict with applicable plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change ▪ Would not address the potential effects of ongoing global climate change and sea level rise ▪ Would be affected by or would increase risk of flooding due to storm surge or sea level rise
Beneficial	▪ Would address the potential effects of ongoing global climate change and sea level rise ▪ Would reduce GHG emissions compared to existing conditions ▪ Would reduce effects of flooding or risk of flooding due to storm surge or sea level rise

HUD does not have established quantitative significance thresholds related to GHG emissions. However, HUD recommends considering following guidance when assessing a project's potential contributions to global climate change:

1. How has the project plan reduced its direct contribution to global climate change? Where feasible, consider using low-carbon building materials and incorporating existing buildings into the project to reduce GHG emissions from construction and material fabrication.
2. Has the project considered indirect contributions toward global climate change? For example, a project could provide electric vehicle charging infrastructure to reduce carbon emissions from residents' transportation choices.
3. What GHG emissions level targets were the proposed project's sustainability tactics designed to meet?

As stated in Section 4.5.3, no State or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Therefore, in recent environmental impact reports certified by the City of Los Angeles, the City has evaluated the significance of projects' potential impacts with regard to GHG emissions and climate change solely on consistency with plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change. The City has also quantified the project's GHG emissions for informational purposes but does not compare the quantified GHG emissions to a numeric threshold.

In the absence of a CEQA-qualified GHG reduction plan, the State of California recommends determining whether a proposed residential or mixed-use residential development would align with the 2022 Scoping Plan by assessing if the project is consistent with all the key project attributes identified in Table 3 of Appendix D of the 2022 Scoping Plan. These attributes are detailed in Table 4.5-8 under Impact GHG-2 in Section 4.5.3. According to the 2022 Scoping Plan, "[p]rojects that have all the key project attributes should accommodate growth in a manner consistent with State GHG reduction and equity prioritization goals" (CARB 2022). The 2022 Scoping Plan also states, "Lead agencies may determine, with adequate additional supporting evidence, that projects that incorporate some, but not all, of the key project attributes are consistent with the State's climate goals" (CARB 2022).

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not result in new construction or changes to existing on-site uses or population, and therefore, would not result in an increase in GHG emissions that could contribute to climate change and sea level rise, alter the risk of flooding at the site, or conflict with the applicable plans and policies related to climate change. Therefore, the No Project Alternative would result in no direct or indirect impacts related to climate change, GHG emissions, and sea level rise.

Proposed Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

As described in Section 4.5.3, the Proposed Project Alternative would implement PDFs GHG-1, GHG-2, and GHG-3, which include installation of rooftop solar panels and EV chargers, as well as transportation demand management features such as a mobility hub, bicycle and pedestrian infrastructure improvements, a car-share program, and other measures to reduce single-occupancy vehicle use. In addition, the Proposed Project Alternative would be designed to achieve Leadership in Energy and Environmental Design (LEED) Gold certification and would include energy and water efficient design features such as light-emitting diode (LED) lighting; efficient HVAC systems and appliances; water efficient fixtures; and water efficient landscaping and irrigation systems. As illustrated in Section 4.5.3, the Proposed Project Alternative would be consistent with the 2022 Scoping Plan, SCAG RTP/SCS, and Green LA and Climate LA plans, which establish goals and strategies for reducing GHG emissions and the impacts of global climate change. Although the Proposed Project Alternative would result in an increase in GHG emissions compared to existing uses on the project site, the Proposed Project Alternative would be consistent with applicable plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change.

Additionally, the Proposed Project Alternative would be designed with the potential impacts of climate change in mind. Building designs and materials that would be durable and resilient to saltwater moisture, coastal breezes, and air pollutants. Buildings would include high-efficiency central HVAC systems to control the interior climate and would incorporate passive cooling and energy efficiency strategies such as roof overhangs. Landscaping plant species would be native and/or adaptive to the region and climate, water conserving, and drought tolerant. As described above, the project site is not anticipated to be at high risk of flooding due to sea level rise and storm surges associated with global climate change. Nonetheless, the Proposed Project Alternative would incorporate low impact development (LID) features to contain, treat, and infiltrate stormwater on the project site and reduce the potential for runoff and flooding, as discussed in Section 4.7, *Hydrology and Water Quality*. Therefore, the Proposed Project Alternative would address the potential effects of ongoing global climate change and sea level rise through project design and operational features. Based on the above, the Proposed Project Alternative would result in less than significant direct and indirect impacts related to global climate change, GHG emissions, and sea level rise.

Historic Rehabilitation Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

Under the Historic Rehabilitation Alternative, the existing buildings would be rehabilitated and operational GHG emissions would generally be consistent with current conditions, though there would be a minor increase in GHG emissions associated with development and operation of the 47 residential units at the 327 Harbor Site. The 327 Harbor Site would be designed to achieve LEED Gold certification and would include energy and water efficient design features such as LED lighting; efficient HVAC systems and appliances; water efficient fixtures; and water efficient landscaping and irrigation systems. Energy efficiency upgrades to appliances and lighting at the OSP Specific Plan Site would also occur where feasible and in compliance with the Secretary's Standards. These features would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans, such as the 2022 Scoping Plan, SCAG RTP/SCS, and Green LA and Climate LA plans. Additionally, as described above, the project site is not anticipated to be at high risk of flooding due to sea level rise and storm surges associated with global climate change. Therefore, the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts related to global climate change, GHG emissions, and sea level rise.

Partial Preservation Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

Similar to the Proposed Project Alternative, the Partial Preservation Alternative would implement PDFs GHG-1, GHG-2, and GHG-3, as applicable, and new buildings would be designed to achieve LEED Gold, and would include energy and water efficient design features. The Partial Preservation Alternative would include a similar mix of uses as the Proposed Project Alternative and would implement the same strategies to reduce GHG emissions. Energy efficiency upgrades to appliances and lighting for rehabilitated buildings on the OSP Specific Plan Site would also occur where feasible and in compliance with the Secretary's Standards. Therefore, the Partial Preservation Alternative would be consistent with the 2022 Scoping Plan, SCAG RTP/SCS, and Green LA and Climate LA plans, which establish goals and strategies for reducing GHG emissions and the impacts of global climate change. Although the Partial Preservation Alternative would result in an increase in GHG emissions compared to existing uses on the project site, the Partial Preservation Alternative would be consistent with applicable plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change.

Similar to the Proposed Project Alternative, the Partial Preservation Alternative would be designed with the potential impacts of climate change in mind. Building designs and materials that would be durable and resilient to saltwater moisture, coastal breezes, and air pollutants. Buildings would include high-efficiency central HVAC systems to control the interior climate and would incorporate passive cooling and energy efficiency strategies such as roof overhangs. Landscaping plant species would be adapted to the region and climate, water conserving, and drought tolerant. As described above, the project site is not anticipated to be at high risk of flooding due to sea level rise and storm surges associated with global climate change. Nonetheless, the Partial Preservation Alternative would incorporate LID features to contain, treat, and infiltrate stormwater on the project site and reduce the potential for runoff and flooding. Therefore, the Partial Preservation Alternative would address the potential effects of ongoing global climate change and sea level rise through project design and operational features. Based on the above, the Partial Preservation Alternative would result in less

than significant direct and indirect impacts related to global climate change, GHG emissions, and sea level rise.

Cumulative Effects

The geographic scope for related projects considered in the cumulative impact analysis for GHG emissions is global because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. Thus, the issue of climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. As discussed above, the No Project Alternative would result in no impact and the project build alternatives would result in less than significant impacts as they would be consistent with the State and local plans for reducing GHG emissions, would incorporate design features that address the effects of climate change, and would not be affected by or exacerbate the risk of flooding and sea level rise. Therefore, cumulative impacts related to global climate change, GHG emissions, and sea level rise would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

7.4.5 Energy

This section analyzes the potential impacts of the project alternatives on energy sources in the project area. A direct impact would occur if a project alternative's demand for energy would exceed the local available capacity to provide such resources during project construction or operation. An indirect impact would occur if a project alternative would induce other changes that could result in future energy availability.

7.4.5.1 Affected Environment

As described in Section 4.15, *Utilities and Service Systems*, the project site is served by existing electricity and natural gas facilities. Electric power to the project site is provided by Los Angeles Department of Water and Power (LADWP). Natural gas is provided by the Southern California Gas Company (SoCalGas). Power to the project site is available from overhead power lines throughout the surrounding streets including O'Farrell Street, Santa Cruz Street, 1st Street, Palos Verdes Street, 3rd Street, and Centre Street. Natural gas is supplied to the area through a system of existing gas mains located under the streets and public rights-of-way. Natural gas is delivered to the project site through natural gas facilities underneath the adjacent public streets. For additional information regarding existing energy facilities and use, the reader is referred to Section 4.15.4.1.

Regulatory Setting

The following laws and regulations applicable to energy are discussed in Section 4.15.4.2:

- Federal Energy Policy Act of 2005
- California SB 1389

Additionally, the California Building Standards and the CALGreen Code in CCR Title 24 are applicable to energy, and are discussed in Section 4.5.2.

A discussion of additional regulations related to energy is provided below:

Federal Construction Equipment Fuel Efficiency Standard

The U.S. EPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements are contained in 40 CFR Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were to be completely phased in by the end of 2015.

California Senate Bill 100

California SB 100, officially titled “The 100 Percent Clean Energy Act of 2018,” requires all California electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. Eligible renewable energy resources include solar, wind, geothermal, biomass, small hydro, renewable methane, ocean wave or thermal, or fuel cells using renewable fuels.

Title 13 California Code of Regulations Sections 2449 and 2485

The purpose of Title 13 CCR Section 2449, General Requirements for In-Use Off-Road Diesel-Fueled Fleets, is to reduce NOx, diesel particulate matter, and other criteria pollutant emissions from in-use off-road diesel-fueled vehicles. The purpose of Title 13 CCR Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, is to reduce public exposure to diesel particulate matter and other air contaminants by establishing idling restrictions, emission standards, and other requirements for heavy-duty diesel engines and alternative idle reduction technologies to limit the idling of diesel-fueled commercial motor vehicles. Title 13 CCR Sections 2449 and 2485 prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes to minimize unnecessary fuel consumption.

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to energy are provided in Table 7-21.

Table 7-21 Energy Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	- Would not result in an unrecoverable use of energy - Would not affect ongoing energy sources
	Indirect Effect	- Would not induce activities that would change energy generation sources or the cost of energy - Would not induce activities that would change the supply, availability, capacity, or costs of energy - Would not affect future ability to utilize energy - Would not yield project delays or increased costs due to limited energy availability

Impact Level	Type of Effect	Impact Description
Less Than Significant	Applies to All Effect Types	- Would result in no discernable changes to or from energy sources on the project site - Would not result in energy shortages; energy availability would be altered for an indiscernible or negligible period
	Direct Effect	- Would result in a temporary unrecoverable use of energy - Would temporarily and minimally disrupt ongoing energy production - Would reduce energy availability from some sources; however, alternate sources are available
	Indirect Effect	- Would induce activities that would temporarily and minimally decrease energy generation or increase cost of energy - Would induce activities that would temporarily and minimally adversely alter the supply, availability, capacity, or costs of energy sources - Would reduce future ability to utilize energy for a short, finite period - Would yield minimal project delays or increased costs due to limited energy availability
	Applies to All Effect Types	- Energy sources would only be altered/diminished minimally, for a short, finite period of time - Impacts would minimally affect energy sources throughout the project site
Potentially Significant	Direct Effect	- Would result in a substantial or long-term unrecoverable use of energy - Would substantially disrupt ongoing energy production - Would reduce energy availability from some sources and alternate sources are not available
	Indirect Effect	- Would induce activities that would substantially decrease energy generation or increase the cost of energy - Would induce activities that would adversely alter the supply, availability, capacity, or costs of energy - Would permanently reduce future ability to utilize energy sources - Would yield project delays or increased costs due to energy shortages
	Applies to All Effect Types	- Energy sources would be adversely altered for an extended or permanent period - Impacts would substantially affect energy sources throughout the project site
Beneficial	Direct Effect	- Would decrease unrecoverable use of energy - Would enhance ongoing energy production - Would increase energy availability from some sources
	Indirect Effect	- Would induce activities that would increase energy generation or decrease the cost of energy - Would induce activities that would improve the supply, availability, capacity, or costs of energy - Would enhance future ability to extract mineral or energy resources
	Applies to All Effect Types	Would result in energy benefits, improvements, and/or enhancements on the project site

The project alternatives were evaluated to determine the potential for changes to the existing conditions related to energy usage. The proximity to and configuration of each considered alternative in relation to energy generation facilities and/or major supply and transmission lines were considered,

as well as the likelihood of project construction or operation to affect generation capacity, costs, availability, or delivery ability. In addition to direct project-related impacts, the ability of the project to induce other activities that would indirectly affect energy availability was also considered.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve ground-disturbing construction activities or change the existing uses of the project site. The No Project Alternative would not involve energy consumption beyond existing conditions or affect existing energy production. Therefore, the No Project Alternative would result in no direct and indirect impacts related to energy.

Proposed Project Alternative

CONSTRUCTION EFFECTS

Construction activities associated with the Proposed Project Alternative would not affect existing energy production or capacity. As described in Section 4.16, *Effects Found Not to Be Significant*, energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Construction contractors would be required to comply with the provisions of CCR Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the U.S. EPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Proposed Project Alternative's net annual operational electricity. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The electricity used for off-road light construction equipment would have the co-benefit of reducing construction-related air pollutant and GHG emissions from more traditional construction-related energy in the form of diesel fuel. Furthermore, per applicable regulatory requirements such as the CALGreen Code (CCR Title 24, Part 11), the Proposed Project Alternative would comply with construction waste management practices to divert a minimum of 75 percent of nonhazardous construction and demolition debris. These practices would result in efficient use of energy necessary to construct the Proposed Project Alternative. In the interest of cost-efficiency, construction contractors also would not consume fuel or electricity in a manner that is wasteful or unnecessary. Therefore, construction of the Proposed Project Alternative would result in less than significant direct and indirect impacts related to energy use.

OPERATIONAL EFFECTS

Operation of the Proposed Project Alternative would not affect existing energy production or capacity. To help achieve and exceed CCR Title 24 reduction targets, the project Applicant proposes to incorporate several energy efficient features into overall project design. The Proposed Project Alternative would be designed to achieve Leadership in Energy and Environmental Design (LEED)

Gold, Greenpoint, or similar rating system certification for the proposed structures. Energy efficient design features include use of energy efficient light-emitting diode (LED) lighting, HVAC systems, appliances, and building materials, as well as incorporation of passive energy efficiency strategies such as roof overhangs, passive lighting, and all-electric residences. In addition, the Proposed Project Alternative would include a rooftop solar photovoltaic system to provide renewable energy on the site. To reduce vehicle miles traveled and associated fuel use, the Proposed Project Alternative includes mix-used development, bicycle- and pedestrian-friendly site design, and improvements to public transit infrastructure to provide neighborhood options for retail and recreation and to encourage alternate modes of transportation. The Proposed Project Alternative would implement transportation demand management strategies to reduce vehicle miles traveled, including encouraging alternatives to single-occupant vehicle use. Implementation of transportation demand strategies would further reduce the vehicle miles traveled and transportation fuel use associated with the Proposed Project Alternative. Furthermore, the Proposed Project Alternative would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by Southern California Edison to LADWP increases to comply with State requirements through California SB 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. For the reasons described above, operation of the Proposed Project Alternative would result in less than significant direct and indirect impacts related to energy consumption.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

Construction activities associated with the Historic Rehabilitation Alternative would not affect existing energy production or capacity. Energy use during construction of the Historic Rehabilitation Alternative would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Construction contractors would be required to comply with the provisions of CCR Title 13 Sections 2449 and 2485, and construction equipment would be subject to the U.S. EPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient, wasteful, or unnecessary fuel consumption. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Historic Rehabilitation Alternative's net annual operational electricity. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The electricity used for off-road light construction equipment would have the co-benefit of reducing construction-related air pollutant and GHG emissions from more traditional construction-related energy in the form of diesel fuel. Furthermore, per applicable regulatory requirements such as the CALGreen Code, the Historic Rehabilitation Alternative would comply with construction waste management practices to divert a minimum of 75 percent of nonhazardous construction and demolition debris. These practices would result in efficient use of energy necessary to construct the Historic Rehabilitation Alternative. In the interest of cost-efficiency, construction contractors also would not consume fuel or electricity in a manner that is wasteful or unnecessary. Therefore, construction of the Historic Rehabilitation Alternative would result in less than significant direct and indirect construction impacts related to energy use.

OPERATIONAL EFFECTS

Operation of the Historic Rehabilitation Alternative would not affect existing energy production or capacity. The Historic Rehabilitation Alternative would rehabilitate buildings on the OSP Specific Plan Site and would include energy efficiency upgrades to the lighting, HVAC systems, appliances, and building materials. The building on the 327 Harbor Site would be constructed to achieve LEED Gold, Greenpoint, or similar rating system certification. Furthermore, the Historic Rehabilitation Alternative would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by Southern California Edison to LADWP increases to comply with State requirements through SB 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. Therefore, operational of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts related to energy consumption.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

Construction activities associated with the Partial Preservation Alternative would not affect existing energy production or capacity. Energy use during construction of the Partial Preservation Alternative would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Construction contractors would be required to comply with the provisions of CCR Title 13 Sections 2449 and 2485, and construction equipment would be subject to the U.S. EPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient, wasteful, or unnecessary fuel consumption. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Partial Preservation Alternative's net annual operational electricity. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The electricity used for off-road light construction equipment would have the co-benefit of reducing construction-related air pollutant and GHG emissions from more traditional construction-related energy in the form of diesel fuel. Furthermore, per applicable regulatory requirements such as the CALGreen Code, the Historic Rehabilitation Alternative would comply with construction waste management practices to divert a minimum of 75 percent of nonhazardous construction and demolition debris. These practices would result in efficient use of energy necessary to construct the Partial Preservation Alternative. In the interest of cost-efficiency, construction contractors also would not consume fuel or electricity in a manner that is wasteful or unnecessary. Therefore, construction of the Partial Preservation Alternative would result in less than significant direct and indirect construction impacts related to energy use.

OPERATIONAL EFFECTS

Operation of the Partial Preservation Alternative would not affect existing energy production or capacity. The Partial Preservation Alternative would be designed to achieve LEED Gold, Greenpoint, or similar rating system certification for the proposed new structures and would include energy efficiency upgrades to the rehabilitated buildings. Energy efficient design features include use of energy efficient LED lighting, HVAC systems, appliances, and building materials and incorporation of passive energy efficiency strategies such roof overhangs, passive lighting, and all-electric residences. In addition, the Partial Preservation Alternative would include a rooftop solar photovoltaic system on

newly constructed buildings to provide renewable energy on the site. To reduce vehicle miles traveled and associated fuel use, the Partial Preservation Alternative includes mix-used use development, bicycle- and pedestrian-friendly site design, and improvements to public transit infrastructure to provide neighborhood options for retail and recreation and to encourage alternate modes of transportation. The Partial Preservation Alternative would implement transportation demand management strategies to reduce vehicle miles traveled, including encouraging alternatives to single-occupant vehicle use. Implementation of transportation demand strategies would further reduce the vehicle miles traveled and transportation fuel use associated with the Partial Preservation Alternative. Furthermore, the Partial Preservation Alternative would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by Southern California Edison to LADWP increases to comply with state requirements through SB 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Cumulative Effects

As discussed in Section 3.4, *Cumulative Development*, 12 cumulative projects have been identified in the vicinity of the project site. These nearby cumulative projects include residential, retail, and restaurant development. Construction and operation of the cumulative projects would contribute to energy consumption and increase the demand for electricity, natural gas, and transportation fuels. However, similar to the project build alternatives, construction of the cumulative projects would be required to comply with regulations that reduce the fuel consumption and energy use, including CCR Title 13 Sections 2449 and 2485, U.S. EPA Construction Equipment Fuel Efficiency Standard, and CALGreen Code. With compliance to these regulations, construction of the project build alternatives would result in less than significant impacts related to energy. Likewise, the cumulative projects would be required to implement sustainability features consistent with CCR Title 24, and would be supplied by electricity providers that source their energy with renewable sources consistent with SB 100. Therefore, construction and operation of any of the project alternatives along with the cumulative projects would result in less than significant cumulative impacts related to energy, the project alternatives' contributions would not be cumulatively considerable.

7.4.6 Geology and Soils

This section analyzes the potential impacts of the project alternatives on geology and soils in the project area. A direct impact would occur if a project alternative would directly alter soil stability during construction and cause property damage due to land subsidence. An indirect impact would occur if a project alternative would induce other changes that could affect geological conditions or soils. For example, should a project alternative result in a long-term potential for ongoing soil erosion, an indirect impact would occur.

7.4.6.1 *Affected Environment*

As described in Section 4.4, *Geology and Soils*, the project site is located on top of a relatively narrow shoreline channel and filled to a relatively level landscape, with gentle slopes down to the southeast. The nearest earthquake fault to the project site is the Palos Verdes Fault Zone, located approximately 0.5 mile north of the project site, and the project site is subject to seismic hazards (California Geological Survey 2022). The project site is susceptible to liquefaction due to seismic shaking. Landslide hazard potential for the project site and surroundings, including due to earthquakes, is considered low. Expansive soils may be encountered underlying the OSP Specific Plan Site; however,

the soils underlying the 327 Harbor Site have very low expansion potential. The potential for subsidence at the project site is considered low (Group Delta Consultants, Inc. [Group Delta] 2022a and 2022b; Appendix D). In addition, the project site is within an area mapped as a low radon zone (CGS 2023). For additional details regarding existing geology and soils at the project site, the reader is referred to Section 4.4.1 and Appendix D.

Regulatory Setting

The following laws and regulations applicable to geology and soils are discussed in Section 4.4.2:

- International Building Code
- Federal Earthquake Hazards Reduction Act
- National Pollutant Discharge Elimination System
- California Building Code (CBC)
- California Alquist-Priolo Earthquake Fault Zoning Act
- California Seismic Hazards Mapping Act
- City of Los Angeles General Plan
- LAMC

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to geology and soils are provided in Table 7-22. Additional significance criteria (not identified in Table 7-22) that were considered include whether the project alternatives would substantially alter or impede access to a unique or valuable geologic feature, or substantially reduce access to important mineral resources. Because no unique or valuable geologic features or important mineral resources have been identified at the project site or immediate vicinity, these significance criteria are not applicable to the project and are not discussed further in this analysis.

Table 7-22 Geology and Soils Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	▪ Would not result in a change to, or increase risk to public safety or the built environment from geological or soil resources or hazards ▪ Would not increase potential for land subsidence
	Indirect Effect	▪ Would not induce any further changes that would affect geological or soil resources ▪ Would not induce any further changes that would increase risk from geological or soils conditions or hazards ▪ Would not result in a downstream change in turbidity, sedimentation, or nutrient/contaminant inputs due to soil erosion
	Applies to All Effect Types	▪ Would result in no discernable changes to geological or soils resources in the project site ▪ Would only alter geological or soils resources for an indiscernible or negligible period of time

Impact Level	Type of Effect	Impact Description
Less Than Significant	Direct Effect	- Would result in short-term, temporary changes to/from geological or soil resources that could be controlled through standard construction best management practices (BMPs) - Would result in soil disturbance and potential for erosion during construction that could be controlled through BMPs
	Indirect Effect	- Would induce further changes that would result in only minimal changes to/from geological or soil resources - Would result in a minimal downstream increase in turbidity, sedimentation, or nutrient/contaminant inputs due to soil erosion
	Applies to All Effect Types	- Geological or soil resources would only be altered/diminished for a short, finite period, and controlled through BMPs - Short-term impacts would be localized in specific areas and not substantially affect or diminish geological or soil resources, or alter associated hazards, throughout the project site
Potentially Significant	Direct Effect	- Would result in increased risk due to collapse of structures or damage to infrastructure because of ground failure, slope failure, land subsidence, and/or ground shaking - Would result in damage to foundations or other infrastructure due to liquefaction, differential settlement, lateral spreading, expansive soils, corrosive soils, or other adverse engineering properties of soils - Would result in moderate to substantial soil erosion - Construction could destabilize existing geologic conditions and/or accelerate adverse geologic processes
	Indirect Effect	- Would result in exposure of persons to elevated levels of radon - Would alter soil types if an area currently prone to daily tidal flooding would be drained - Would result in moderate/substantial downstream increase in turbidity, sedimentation, or nutrient/contaminant inputs - Would induce further changes that would result in moderate/substantial changes to/from geological or soil resources
	Applies to All Effect Types	- Geological or soil resources would be adversely altered for an extended or permanent period - Impacts would substantially affect geological or soils resources throughout the project site - Would result in increased risk to people or the built environment from geological or soils hazards
Beneficial	Direct Effect	- Would decrease risk due to geological or soils conditions, or would stabilize or protect geological or soil conditions - Would decrease soil erosion
	Indirect Effect	- Would result in a decrease in radon exposure - Would decrease downstream turbidity, sedimentation, or nutrient/contaminant inputs - Would induce further changes that would result in improvements to/from geological or soil resources or hazards
	Applies to All Effect Types	Would result in geological or soil resources benefits, improvements, and/or risk reductions in the project site

The project alternatives were evaluated to determine the potential for changes to geology and soils within the project site. The evaluation of geological hazards is based on the Preliminary Geotechnical Reports prepared by Group Delta Consultants (2022a and 2022b) provided as Appendix D to this Draft EIR/EIS. The Preliminary Geotechnical Reports included a review of published geologic data, field and laboratory testing of soil borings, and engineering analysis to assess the geotechnical feasibility of the proposed project.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve ground-disturbing construction activities or change the existing uses of the project site. Because no new development would occur under this alternative, the soil suitability, slope, geological conditions, low potential for exposure to radon, and erosion rate would remain the same as existing conditions. Under the No Project Alternative, existing structures on the OSP Specific Plan Site would be renovated over time, which would include seismic retrofitting to reduce the risk of loss, injury, or death due to seismic hazards. Therefore, the No Project Alternative would result in no direct impact related to geology, an indirect beneficial impact related to geology, and no direct or indirect impact related to soils.

Proposed Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

Construction of the Proposed Project Alternative would require grading and excavation. Grading and excavation activities would temporarily expose bare soils, which could potentially be removed from the project site and transported through wind shearing or stormwater runoff. Construction would disturb more than 1.0 acre of land, which mandates implementation of an NPDES-compliant Storm Water Pollution Prevention Plan (SWPPP), as discussed in Section 4.7, *Hydrology and Water Quality*. The SWPPP would include BMPs to reduce soil erosion and sedimentation, including measures such as the regular wetting of exposed soils and the covering of stockpiled soils. Additionally, the Proposed Project Alternative would be required to comply with LAMC Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities, to minimize erosion during construction. With implementation of the SWPPP and the erosion control measures and BMPs required by the LAMC, construction of the Proposed Project Alternative would not result in substantial soil erosion or increases in turbidity, sedimentation, or nutrient levels in runoff. Upon completion of construction activities, project site soils would be stabilized and landscaped, and the potential for erosion during project operation would be minimal. Therefore, potential direct and indirect impacts related to soil erosion would be less than significant.

The project site is subject to low risk of radon pollution, landslides, and subsidence, and impacts related to the exposure of people to these geological hazards under the Proposed Project Alternative would be less than significant. As described in Section 4.4.3, the project site is subject to seismic and soil hazards, including ground shaking, liquefaction, and expansive soils. The Proposed Project Alternative would not involve mining operations, deep excavation into the Earth, or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust that could exacerbate seismic hazards. The Proposed Project Alternative would be constructed in compliance with existing CBC and City of Los Angeles standards, which would generally ensure the Proposed Project Alternative

would not be significantly affected by unsuitable soil and geologic conditions. Nonetheless, the Proposed Project Alternative would increase development density on the project site, thereby increasing the number of people and structures exposed to seismic ground shaking and soil hazards, resulting in potentially significant impacts.

MITIGATION MEASURES

Because impacts related to geologic and soil hazards under the Proposed Project Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures GEO-1 and GEO-2 from Section 4.4.3:

GEO-1 Final Geotechnical Report:

Prior to issuance of grading permits, the Applicant shall submit final design plans and a final design-level geotechnical report for the OSP Specific Plan Site and 327 Harbor Site to the Los Angeles Department of Building and Safety (LADBS) for review and approval. The final design-level geotechnical reports shall be used for final design of the foundation systems for the structures and shall take into consideration the engineering properties beneath the proposed structures and the projected loads. The final reports shall specify geotechnical design parameters that are needed by structural engineers to determine the type and sizing of structural building materials. The final reports shall be subject to the specific performance criteria imposed by applicable State and local codes and standards. The final geotechnical reports shall be prepared by a registered civil engineer or certified engineering geologist and include appropriate measures to address seismic hazards and ensure structural safety of the proposed structures and future residents and employees. The proposed structures shall be designed and constructed in accordance with all applicable provisions of the CBC and the Los Angeles Building Code. The final design-level geotechnical reports shall address the recommendations provided in the Preliminary Geotechnical Reports prepared by Group Delta, including the following:

- Construction and operation of the proposed project shall be implemented in accordance with the applicable regulatory and code requirements.
- The subsurface geotechnical profile on the OSP Specific Plan Site is complex and variable. The transitions between native materials, fill, and groundwater conditions shall be considered in conjunction with the proposed site plans and building layouts in order to develop the most suitable foundation option for each proposed structure. All recommendations regarding the foundation options for Zones A, B, and C and Transition Zones shall be considered and implemented.
- Mat foundations, deep foundations, and pile types shall be designed and implemented in accordance with the recommendations of the geotechnical reports. The contour of the foundation pressure shall be provided during the structural design phase.
- Floor slabs may be supported on grade if the existing soils on site can be removed and replaced with properly compacted fill soils. If expansive soils are present at the slab-on-grade elevation, floor slabs shall be structurally supported.
- Temporary excavation shall be implemented using conventional heavy-duty grading equipment such as scrapers, loaders, dozers, and excavators. Temporary excavations up to 5 feet deep may stand in vertical cuts, and deeper excavations shall be sloped according to the recommendations of the final geotechnical reports. Temporary shoring shall be designed and implemented according to the guidelines set forth in the Preliminary Geotechnical Reports.

- If unstable or wet subgrade material is encountered during project design and construction, stabilization shall consist of the placement of granular working mats consisting of course gravel and geogrid, or subexcavation and replacement with dried soil.
- Basement walls shall be in compliance with the Los Angeles Building Code to resist at-rest earth pressures. The recommended pressure shall be confirmed during the design-level geotechnical investigations and shall consider the presence of expansive soils, which may require the use of higher design earth pressures.
- Final design-level geotechnical investigations shall assess the corrosion potential of on-site soils and the extent and severity of expansive soils.
- Sandy soils, after clearing, grubbing, and removal of deleterious material, are generally suitable for reuse as compacted fills. However, not all on-site sandy soils will be suitable for specific purposes, and selective grading and testing may be required if on-site soils are to be used as select materials. Import fill sources, if any, shall be observed and tested prior to hauling onto the site to evaluate the suitability for use. Imported fill shall comply with the guidance outlined in the Preliminary Geotechnical Reports.
- Further study is required to accurately characterize the complex subsurface conditions on the OSP Specific Plan Site. Design-level geotechnical investigations shall be conducted, and the installation of monitoring wells, borings, and cone penetration tests shall be completed to narrow down the location of uncertified fill transitions zones and further characterize the subsurface materials.

GEO-2 Geotechnical Professional Observation:

A certified geotechnical professional shall be retained to observe and test all grading operations for shallow foundations and pile installation for deep foundations during the construction stage of the project. Furnishing of pile load test results shall be required. Evidence of the observations of the certified geotechnical professional at the project site shall be provided to the City Engineer in the form of weekly logs during all grading operations for foundations and pile installation activities.

SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures GEO-1 and GEO-2, project-specific Final Geotechnical Reports would be prepared that would include design criteria to minimize the potential for geologic hazards at the site, and the Proposed Project Alternative's design and construction would be implemented based on the recommendations contained in the Preliminary Geotechnical Reports under the oversight of a certified geotechnical professional. With compliance with existing regulatory requirements and implementation of Mitigation Measures GEO-1 and GEO-2, impacts of the Proposed Project Alternative related to geologic and soil hazards would be less than significant.

Historic Rehabilitation Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

Construction of the Historic Rehabilitation Alternative would require grading and excavation activities would temporarily expose bare soils, which could potentially be removed from the project site and transported through wind shearing or stormwater runoff. Construction would disturb more than 1.0 acre of land, which mandates implementation of an NPDES-compliant SWPPP, as discussed in Section 4.7, *Hydrology and Water Quality*. Additionally, the Historic Rehabilitation Alternative would be required to comply with LAMC Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities, to minimize erosion during construction. With the

implementation of the SWPPP and erosion control measures and BMPs required by the LAMC, construction of the Historic Rehabilitation Project Alternative would not result in substantial soil erosion or increases in turbidity, sedimentation, or nutrient levels in runoff. Upon completion of construction activities, project site soils would be stabilized and landscaped, and the potential for erosion during project operation would be minimal. Therefore, potential direct and indirect impacts related to soil erosion would be less than significant.

The Historic Rehabilitation Alternative would not involve land uses that cause or accelerate hazardous geologic and soil conditions. Under the Historic Rehabilitation Alternative, impacts related to site-specific geologic hazards, including strong seismic shaking, liquefaction, expansive soils, seismically induced settlement, soil stability, and subsidence would be similar to the Proposed Project Alternative's impacts because these impacts are a function of the project site's underlying geologic conditions. The Historic Rehabilitation Alternative would be designed and constructed to conform to the current seismic design provisions of the CBC, California Historic Building Code, and Los Angeles Building Code, as applicable. Compliance with these regulations would generally ensure the Historic Rehabilitation Alternative would not be significantly affected by unsuitable soil and geologic conditions. Nonetheless, the Historic Rehabilitation Alternative would increase the number of residents on the project site compared to existing uses, thereby increasing the number of people and structures exposed to seismic ground shaking and soil hazards, resulting in potentially significant impacts.

MITIGATION MEASURES

Because impacts related to geologic and soil hazards under the Historic Rehabilitation Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures GEO-1 and GEO-2 from Section 4.4.3, as presented under the Proposed Project Alternative above.

SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures GEO-1 and GEO-2, project-specific Final Geotechnical Reports would be prepared that would include design criteria to minimize the potential for geologic hazards at the site, and the Historic Rehabilitation Alternative's design and construction would be implemented based on the recommendations contained in the Preliminary Geotechnical Reports under the oversight of a certified geotechnical professional. With compliance with existing regulatory requirements and implementation of Mitigation Measures GEO-1 and GEO-2, impacts of the Historic Rehabilitation Alternative related to geologic and soil hazards would be less than significant.

Partial Preservation Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

Construction of the Partial Preservation Alternative would require grading and excavation activities would temporarily expose bare soils, which could potentially be removed from the project site and transported through wind shearing or stormwater runoff. Construction would disturb more than 1.0 acre of land, which mandates implementation of an NPDES-compliant SWPPP, as discussed in Section 4.7, *Hydrology and Water Quality*. Additionally, the Partial Preservation Alternative would be required to comply with LAMC Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities, to minimize erosion during construction. With the implementation of the SWPPP and erosion control measures and BMPs required by the LAMC,

construction of the Partial Preservation Alternative would not result in substantial soil erosion or increases in turbidity, sedimentation, or nutrient levels in runoff. Upon completion of construction activities, project site soils would be stabilized and landscaped, and the potential for erosion during project operation would be minimal. Therefore, potential direct and indirect impacts related to soil erosion would be less than significant.

The Partial Preservation Alternative would not involve land uses that cause or accelerate hazardous geologic and soil conditions. Under the Partial Preservation Alternative, impacts related to site-specific geologic hazards, including strong seismic shaking, liquefaction, expansive soils, seismically induced settlement, soil stability, and subsidence would be similar to the Proposed Project Alternative's impacts because these impacts are a function of the project site's underlying geologic conditions. The Partial Preservation Alternative would be designed and constructed to conform to the current seismic design provisions of the CBC, California Historic Building Code, and Los Angeles Building Code. Compliance with these regulations would generally ensure the Partial Preservation Alternative would not be significantly affected by unsuitable soil and geologic conditions. Nonetheless, the Partial Preservation Alternative would increase density on the project site compared to existing uses, thereby increasing the number of people and structures exposed to seismic ground shaking and soil hazards, resulting in potentially significant impacts.

MITIGATION MEASURES

Because impacts related to geologic and soil hazards under the Partial Preservation Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures GEO-1 and GEO-2 from Section 4.4.3, as presented under the Proposed Project Alternative above.

SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures GEO-1 and GEO-2, project-specific Final Geotechnical Reports would be prepared that would include design criteria to minimize the potential for geologic hazards at the site, and the Partial Preservation Alternative's design and construction would be implemented based on the recommendations contained in the Preliminary Geotechnical Reports under the oversight of a certified geotechnical professional. With compliance with existing regulatory requirements and implementation of Mitigation Measures GEO-1 and GEO-2, impacts of the Partial Preservation Alternative related to geologic and soil hazards would be less than significant.

Cumulative Effects

As shown in Table 3-1 in Section 3.4, *Cumulative Development*, there are 12 cumulative projects in the vicinity of the project site that comprise the cumulative projects list. The cumulative projects include adaptive reuse of existing buildings and construction of new mixed-use, hotel, restaurant, and residential developments. Construction and operation of cumulative projects have the potential to result in soil erosion and related downstream impacts. However, similar to the project alternatives, cumulative projects would be required to comply with NPDES and LAMC requirements, as applicable, to reduce the potential for erosion, sedimentation, and runoff-related impacts. Therefore, cumulative impacts related to soil erosion would be less than significant.

Cumulative development in the project site vicinity would also gradually increase population and jobs in San Pedro, and therefore, gradually increase the number of people exposed to potential geologic and soils hazards, including effects associated with seismic events, such as ground rupture, seismic shaking, liquefaction, and landslides, as well as unstable soils. However, geologic hazards are site-specific, and individual developments would not create compounding impacts that would affect

geologic conditions on other sites. Moreover, other development projects would be subject to CEQA and/or NEPA review on a case-by-case basis and would be required to comply with applicable provisions of the City of Los Angeles General Plan, LAMC, and CBC to minimize seismic and soils risks. The City also requires all new structures comply with seismic and geologic hazard safety standards, including design and construction standards that regulate land use in areas known to have or to potentially have substantial seismic and/or other geologic hazards. Therefore, cumulative impacts related to geologic and seismic hazards would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

7.4.7 Hazards and Hazardous Materials

This section analyzes the potential impacts of the project alternatives on hazards and hazardous materials in the project area. A direct impact would occur, for example, if construction of a project alternative would take place on an existing contaminated site, such that construction could result in the exposure of contamination in the immediate environment. An indirect impact would occur if a project alternative would preclude or limit future remediation activities at a contaminated location.

Affected Environment

As discussed in Section 4.6, *Hazards and Hazardous Materials*, several studies related to hazards materials have been conducted for the project site, including Phase I Environmental Site Assessments, Phase II Environmental Site Assessments, and a soil vapor assessment have been prepared for the project site. These studies included searches of federal, State, local, and tribal databases related to hazardous waste and materials, as well as information based on site inspections, building and use permit records, and Sanborn Co. maps. Based on findings of these studies, several recognized environmental conditions (RECs)¹¹, historical recognized environmental conditions (HRECs)¹², and controlled recognized environmental conditions (CRECs)¹³ are present on the project site including:

- **OSP Specific Plan Site:** Total petroleum hydrocarbons (TPH), VOCs, and polynuclear aromatic hydrocarbons (PAHs), in soils and VOCs in soil vapor due to the presence of a former manufactured gas plant, former kerosene underground storage tank (UST), former sheet metal facility, and existing maintenance facility.
- **327 Harbor Site:** TPH and metals (primarily lead) in soils and groundwater and VOCs in soil vapor due to the former uses on the site, including the ARCO Battery Manufacturing facility in the southern portion of the site and automotive repair facility in the northern portion of the site.

The project site does not contain any Superfund sites, historic landfills, USTs, or aboveground storage tanks (ASTs). For additional details regarding existing contamination and toxic substances at the project site, the reader is referred to Section 4.6.1.

¹¹ The American Society for Testing and Materials define RECs as the presence or likely presence of hazardous substances or petroleum products in, on, or at a subject property due to a release or likely release to the environment, or the presence of hazardous substances or petroleum products in, on, or at a subject property under conditions that pose a material threat of a future release to the environment.

¹² A historical REC is a past release of any hazardous substances that has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority without any required controls.

¹³ A controlled REC is a past release of hazardous substances that has been addressed to the satisfaction of the applicable regulatory authority, with the hazardous substances allowed to remain in place subject to the implementation of required controls.

Regulatory Setting

The following laws, regulations, and plans applicable to hazards and hazardous materials are discussed in Section 4.6.2:

- Federal Resource Conservation and Recovery Act
- Federal Comprehensive Environmental Response, Compensation, and Liability Act
- Federal Occupational Safety and Health Act of 1970
- Federal Toxic Substances Control Act
- Federal Hazardous Materials Transportation Act
- Federal Research and Special Programs Administration
- Federal Emergency Management Act
- Federal Disaster Mitigation Act of 2000
- California Hazardous Materials Release Response Plans and Inventory Law of 1985
- California Hazardous Waste Control Law
- California Underground Storage Tanks Program
- California Lead-Based Paint Regulations
- California Occupational Safety and Health Act
- California Safe Drinking Water and Toxic Enforcement Act
- California Water Code
- California Fire Code, Title 24, Part 9, Chapters 33, 50, and 57
- California Uniform Fire Code
- SCAQMD District Rules 1113, 1166, 1403, and 1466
- City of Los Angeles General Plan Safety and Conservation Elements

A discussion of additional regulations related to hazards and hazardous materials is provided below:

Superfund Amendments and Reauthorization Act

In 1986, the Superfund Amendments and Reauthorization Act amended the Comprehensive Environmental Response, Compensation, and Liability Act, reflecting the U.S. EPA's experience in administering the Superfund program for six years. The Superfund Amendments and Reauthorization Act provided new enforcement authorities and tools, increased the amount of funds available for hazardous waste site cleanups and increased the awareness of human health problems affiliated with hazardous waste sites. Another change generated by the Superfund Amendments and Reauthorization Act was the revision of the U. S. EPA's Hazard Ranking System to accurately assess the risk posed to human health and the environment by uncontrolled hazardous waste sites.

Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act Title III)

The Emergency Planning and Community Right-to-Know Act was created under Superfund Amendments and Reauthorization Act Title III to help communities protect public health and safety from chemical hazards. The national legislation requires each state to appoint a State Emergency Response Commission, which then divides each state into Emergency Planning Districts and nominates a Local Emergency Planning Committee for each district. The Emergency Planning and

Community Right-to-Know Act provides compliance and reporting standards as well as waste, chemical, and cleanup enforcement, allowing each district to plan and prepare thoroughly should a hazardous waste accident or release arise.

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to hazards and hazardous materials are provided in Table 7-23.

Table 7-23 Hazards and Hazardous Materials Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Hazardous Materials Change	- Would avoid RECs, HRECs, CRECs, Superfund sites, historic landfills, USTs, historic fill, and unknown contaminated sites - Would maintain the Acceptable Separation Distance from all stationary hazards, such as ASTs - Would not introduce new contaminants into the environment or alter the risk of spreading contaminants - Would not affect existing remedial investigations or remedial actions
	Indirect Hazardous Materials Change	- Would not induce any further changes that would affect contaminated sites - Would not induce any further changes that would introduce new contaminants or increase the risk of spreading contaminants - Would not induce any further activities that would affect existing remedial investigations or remedial actions - Would not limit or conflict with future remedial activities - Would not result in off-site or future release/transport of contaminants
	Applies to All Effect Types	- Would not induce any further changes that would affect contaminated sites - Would not induce any further changes that would introduce new contaminants or increase the risk of spreading contaminants - Would not induce any further activities that would affect existing remedial investigations or remedial actions - Would not limit or conflict with future remedial activities - Would not result in off-site or future release/transport of contaminants
Less Than Significant	Direct Hazardous Materials Change	- Would minimally or temporarily affect a contaminated site or introduce minimal amounts of contaminants into the environment temporarily but would include proper controls and measures to avoid the spread of contamination - Would temporarily affect remedial investigations or remedial actions
	Indirect Hazardous Materials Change	- Would induce other activities that would temporarily affect contaminated sites, introduce minimal amounts of contaminants, minimally increase the risk for spreading contaminants, and/or affect existing remedial investigations or remedial actions - Would place minimal limitations on future remedial activities that would not preclude attaining remediation goals
	Applies to All Effect Types	- Ongoing or planned remedial activities would only be affected for a short, finite period of time - Short-term impacts would be localized in specific areas and not introduce contaminants, spread contamination, alter hazards, or affect long-term remedial activities

Housing Authority of the City of Los Angeles and City of Los Angeles Housing Department
One San Pedro Specific Plan

Impact Level	Type of Effect	Impact Description
Potentially Significant		Potential hazardous materials effects would be controlled through BMPs, engineering controls, and/or institutional controls
	Direct Hazardous Materials Change	- Would moderately/substantially or permanently impact a contaminated site and would limit the remediation activity - Would moderately/substantially or permanently increase the risk of spreading contaminants or introduce contaminants to the environment - Would moderately/substantially or permanently conflict with ongoing remedial investigations or remedial actions
	Indirect Hazardous Materials Change	- Would induce further changes that would affect contaminated sites, introduce sizeable amounts of contaminants, increase the risk of spreading of contaminants over an extended timeframe, and/or moderately/substantially/permanently conflict with existing remedial investigations or remedial actions - Would limit or conflict with future remedial activities - Would result in off-site or future release/transport of contaminants
	Applies to All Effect Types	- Would substantially limit remedial activities, introduce sizeable amounts of contaminants, and/or increase the risk of spreading contaminants in the environment - Would potentially result in increased risk to people or property from contamination or failure to maintain the Acceptable Separation Distance from stationary hazards
Beneficial	Direct Hazardous Materials Change	- Would reduce contamination, the risk for spreading contaminants, or the potential risk to people, property, and/or the environment from contamination - Would expedite, benefit, or improve remedial investigations and remedial actions - Would reduce the amount of contamination in the environment over the short- or long-term
	Indirect Hazardous Materials Change	- Would induce improvements that would reduce contamination, reduce the risk for spreading contaminants, or reduce the potential risk to people, property, and/or the environment from contamination - Would expedite, benefit, or improve future remedial activities - Would result in a decrease in off-site or future release/transport of contaminants
	Applies to All Effect Types	Would result in hazardous materials benefits, improvements, and/or risk reductions in the project area

It is HUD policy, as described in 24 CFR Part 50.3(i) and 24 CFR 58.5(i)(2), that:

1. All property proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gasses, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property.
2. Environmental review of multi-family and non-residential properties shall include evaluation of previous uses of the site and other evidence of contamination on or near the site, to assure that occupants of proposed sites are not adversely affected by the hazards.
3. Particular attention should be given to any proposed site on or in the general proximity of such areas as dumps, landfills, industrial sites, or other locations that contain, or may have contained, hazardous wastes.
4. The responsible entity shall use current techniques by qualified professionals to undertake investigations determined necessary.

HUD's guidance for assessing significant impacts related to hazards and hazardous materials is to consider:

- Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property?

Sites known or suspected to be contaminated by toxic chemicals or radioactive materials include but are not limited to sites: (i) listed on a U.S. EPA Superfund National Priorities or CERCLA List, or equivalent State list; (ii) located within 3,000 feet of a toxic or solid waste landfill site; or (iii) with an underground storage tank. For any of these conditions, the grantee must provide an ASTM Phase I report.

Non-Federal Housing Authority (FHA) projects should identify the potential for hazardous substances or materials that may affect the health and safety of the users of the property as follows:

- Review databases maintained by U.S. EPA and State, local, and tribal environmental quality departments or agencies to screen for potential on-site and off-site facilities that could pose health and safety problems and toxic clean-up sites that are presently under analysis or remediation.
- Investigate previous uses of the site. Site inspections and building and use permit records as well as Sanborn Co. maps show previous land uses which could have left toxic residues. Other methods of evaluation include performing a site walk, interviewing property owners or managers and local officials, and analyzing local land use records, permits, and violations.
- When site conditions indicate that the subject property is contaminated or likely contaminated by toxic substances, hazardous materials or petroleum products, one shall provide an ASTM certified Phase I Environmental Site Assessment (ESA) report, or other studies where applicable. Any hazards that are identified should be evaluated for the potential to affect the health and safety of the occupants and end-users. Contact your local HUD field environmental officer for further technical assistance in this regard.

To analyze the project's potential hazards and hazardous materials impacts, the various Environmental Site Assessments and site investigations (Appendix E) prepared for the OSP Specific Plan Site and the 327 Harbor Site were reviewed. Supplementary information was obtained through review of City of Los Angeles resources, such as the General Plan Safety Element, and other online

databases for additional information (e.g., landfills, oil and gas wells, methane, hazardous material transportation pipelines) to supplement the available project-specific reports.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve ground-disturbing construction activities or change the existing uses of the project site. The No Project Alternative would involve the continued use hazardous materials commonly used in residential developments, such as cleaning agents, paints, pesticides, and materials used for landscaping, and no new use, storage, or generation of hazardous materials and waste would occur. The existing conditions of the project site would continue to be maintained, including existing contaminated soils at the project site. Although contaminated soils are present, because the No Project Alternative would not involve construction activities or changes to the existing operation of the project site, no direct or indirect impacts related to the release of hazardous materials and no further changes that would affect contaminated soils or result in new contamination would occur. Therefore, the No Project Alternative would result in no direct or indirect impacts related to hazards and hazardous materials.

Proposed Project Alternative

CONSTRUCTION EFFECTS

Construction of the Proposed Project Alternative would require the transport, use, storage, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). These materials are commonly used at construction sites, and construction activities would be required to comply with applicable State and federal regulations established by the U.S. EPA, the State of California, and the County of Los Angeles for proper transport, use, storage, and disposal of hazardous materials and hazardous construction waste. In addition, as discussed in detail in Section 4.7, *Hydrology and Water Quality*, compliance with the Construction General Permit requires implementation of Good Housekeeping Best Management Practices (BMPs) to reduce potential impacts to water quality due to spills or runoff from hazardous materials used during construction. Compliance with these regulations would reduce the risk of construction-related spills.

In addition, during construction of the Proposed Project Alternative, existing contaminated soils on the project site would be removed, resulting in the transport and disposal of large quantities of contaminated soils. These activities would be required to comply with applicable federal regulations established by the U.S. EPA for proper transport, use, and disposal of hazardous materials and hazardous construction waste. However, the disturbance of contaminated soils could result in potentially significant direct impacts related to hazardous materials.

Due to the age of the existing buildings on the OSP Specific Plan Site, there is a potential for ACM, LBP, and polychlorinated biphenyls (PCB) to be present in building materials on the site. Demolition of the existing on-site structures on the OSP Specific Plan Site has the potential to release ACM, LBP, and PCBs into the atmosphere if not properly removed and disposed of prior to demolition. Release of these hazardous materials could expose construction workers, nearby residents, and students at the nearby school to health hazards. However, as described in Section 4.6, *Hazards and Hazardous*

Materials, the Proposed Project Alternative would comply with the requirements of SCAQMD Rule 1403, the National Emissions Standards for Hazardous Air Pollutants, Title 40 of the CFR, Title 22 of the CCR, the Toxic Substance Control Act, and the Hazardous Materials Transportation Act to ensure that construction would result in less than significant short-term construction impacts related to hazardous building materials.

In summary, construction of the Proposed Project Alternative would result in less than significant direct and indirect impacts related to the temporary use of hazardous materials and the handling of hazardous building materials during construction. However, direct construction impacts related to the disturbance and removal of contaminated soil on the project site would be potentially significant.

OPERATIONAL EFFECTS

During operation of the Proposed Project Alternative, small amounts of hazardous materials common to residential and commercial retail development would be used, such as cleaning agents, paints, pesticides, and materials used for landscaping, which do not typically involve the use or storage of large quantities of hazardous materials. The use of hazardous materials during operation of the Proposed Project Alternative would occur in accordance with applicable requirements related to the transport, use, storage, and disposal of hazardous materials. With compliance with existing regulations, direct and indirect impacts related to the use of hazardous materials during operation would be less than significant. However, as noted above and described in detail in Section 4.6, *Hazards and Hazardous Materials*, the project site contains contaminated soils and associated soil vapors. During operation of the Proposed Project Alternative, VOCs in soil vapor could pose a threat to human health of future project residents and workers through the migration of vapors through building floors and foundations. Therefore, direct operational impacts would be potentially significant.

MITIGATION

Because construction and operational impacts related to hazards and hazardous materials under the Proposed Project Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures HAZ-1 through HAZ-5 from Section 4.6.3:

HAZ-1 Voluntary Oversight Agreement with the Los Angeles County Fire Site Mitigation Unit:

Because contaminated soil is present on the project site, the Applicant shall coordinate on-site remediation activities on the OSP Specific Plan Site and 327 Harbor Site with the Los Angeles County Fire Department Site Mitigation Unit (LACFD SMU). Prior to initiation of soil grading, excavation, or remediation activities, the Applicant shall enter into a Voluntary Oversight Agreement with the LACFD SMU. The LACFD SMU shall oversee the assessment and remediation of the OSP Specific Plan Site and 327 Harbor Site through completion of building demolition, excavation, soil remediation, and building construction. Prior to commencement of demolition and excavation/grading activities on the OSP Specific Plan Site and 327 Harbor Site, the Applicant shall submit the following documents to the LACFD SMU for review and approval:

- All Environmental Site Assessments and subsurface investigation reports completed for the OSP Specific Plan Site and 327 Harbor Site
- Current development plan, including plans for soil excavation and removal and/or vapor barriers
- Soil management plans completed for the OSP Specific Plan Site and 327 Harbor Site
- Any additional hazardous materials-related reports completed for the project

Upon submittal of the information above, LACFD SMU may require further actions such as: additional subsurface investigation, including additional soil, soil vapor or groundwater monitoring wells; soil excavation and off-site disposal; completion of human health risk assessments; installation of soil vapor barriers, and/or completion of remediation reports or case closure documents. The Applicant shall submit all reports and documentation to the LACFD SMU for review and approval prior to initiation of soil grading, excavation, or remediation activities.

The Applicant shall obtain an approval letter from LACFD SMU prior to initiation of grading and construction activities. The approval letter shall specify that LACFD SMU is in agreement that the on-site soil has been remediated to LACFD SMU standards and project construction can commence. Prior to issuance of grading permits, the Applicant shall submit the approval letter to the LADBS.

It should also be noted that LACFD SMU may determine that Los Angeles Regional Water Quality Control Board (RWQCB) or California Department of Toxic Substances Control (DTSC) may be best suited to perform the cleanup oversight agency duties for the assessment and/or remediation of the project site. Should the cleanup oversight agency be transferred from LACFD to the Los Angeles RWQCB or DTSC, this and other mitigation measures shall still apply and will be overseen by the designated cleanup oversight agency.

HAZ-2 Soil Management Plan:

Prior to commencement of grading and excavation activities at the project site, the Applicant shall retain a qualified environmental consultant (professional geologist [PG] or professional engineer [PE]) to prepare a Soil Management Plan (SMP) for the OSP Specific Plan Site and the 327 Harbor Site. The SMP shall specify the limits of soil that require removal to remediate the soil contamination on the OSP Specific Plan Site and the 327 Harbor Site. The SMP will provide the City of Los Angeles and the construction contractor with guidance and procedures for the proper handling and management of impacted soil, if any is encountered, during site construction activities. The SMP shall include measures required for compliance with all application regulations, including but not limited to, SCAQMD Rule 1466. The SMP shall address:

- On-site handling and management of contaminated soils or other hazardous wastes (e.g., stained soil, and soil with solvent or chemical odors) if such soils or hazardous wastes are encountered, and
- Specific actions to reduce hazards to construction workers and off-site receptors during the construction stages. The SMP shall specifically address hazards to residences and schools within 0.25 mile of the project site.

The plan must establish remedial measures and soil management practices to ensure construction worker safety, the health of future workers and visitors, and the prevention of off-site migration of contaminants from the project site. These measures and practices shall include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of Best Management Practices
- Proper disposal procedures of contaminated materials
- Investigation procedures for encountering known and unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, and/or debris during ground-disturbing activities
- Monitoring and reporting

- A health and safety plan for contractors working at the Project Site that addresses the safety and health hazards of each stage of construction activities with the requirements and procedures for employee protection
- The health and safety plan shall outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction

The Applicant shall submit the SMP to the LACFD SMU (or other designated oversight agency) for review and approval prior to grading, excavation, or remediation activities at the project site. The approved SMP shall be submitted to the LADBS prior to issuance of grading permits. The Applicant shall ensure the construction contractor implements the SMP during demolition, grading, and construction at the project site.

HAZ-3 Soil Remediation:

Where contaminated soil that exceeds hazardous waste screening levels is known to be present on the OSP Specific Plan Site and 327 Harbor Site, the Applicant shall retain a qualified environmental consultant (PG or PE) to properly remove and dispose of the contaminated soil. All soil removal and disposal activities shall be conducted in accordance with the recommendations of the SMP. The qualified environmental consultant shall utilize the project site analytical results for waste characterization purposes prior to off-site transportation or disposal of potentially impacted soils or other impacted wastes. The qualified consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other hazardous wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.

Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of sub-surface impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and off-site disposal or recycling.

Prior to initiation of soil excavation or soil remediation activities, the LACFD SMU (or other designated oversight agency) shall review and approve the soil removal and disposal recommendations prior to transportation of waste soils off site and review and approve remedial engineering controls.

The Applicant shall review and ensure the qualified environmental consultant implements the disposal recommendations prior to transportation of waste soils off site and review and implements the remedial engineering controls prior to and during construction.

The City shall review and approve the disposal recommendations and remedial engineering controls prior to issuing a grading permit.

HAZ-4 Construction Vapor Monitoring Plan:

The Applicant shall retain a qualified environmental consultant (PG or PE) or other qualified person to prepare a Construction Vapor Monitoring Plan. The Vapor Monitoring Plan shall specify the controls required to be implemented during construction activities at the OSP Specific Plan Site and 327 Harbor Site to mitigate the effects of subsurface gases on workers and the public. Controls could include, but are not limited to:

- Gas monitoring devices would be present to alert workers of elevated gas concentrations when basement or subsurface soil disturbing work is being performed;
- Contingency procedures would be in place if elevated gas concentrations are detected such as the mandatory use of personal protective equipment, evacuating the area, and/or increasing ventilation within immediate work area where the elevated concentrations are detected;

- Workers would be trained to identify exposure symptoms and implement alarm response actions;
- Soil exposed during excavations would be minimized to reduce the surface area which could off-gas. This will be done by staggering exposed excavation areas;
- Soil removed as part of construction will be sampled and tested for off-site disposal in a timely manner. If soil is stockpiled prior to disposal, it would be managed in accordance with the project's Storm Water Pollution Prevention Plan;
- Fencing would be established to limit public access and allow for gas dilution; and
- Health and Safety Plan (HASP) development which would describe the work activities and hazards associated with each work activity.
- Hazard mitigation shall be presented in the HASP to limit construction risks to workers. The HASP shall contain emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The HASP shall be signed by all workers on site to demonstrate their understanding of the construction risks.

The Applicant shall submit the Construction Vapor Monitoring Plan to the LACFD SMU for review and approval. The Applicant shall submit the approved Construction Vapor Monitoring Plan to the LADBS prior to issuance of a grading permit.

HAZ-5 Vapor Mitigation System:

Where soil vapor is known to be present at chemical concentrations exceeding screening levels for sub-slab/soil gas (vapor) intrusion, the Applicant shall retain a qualified environmental consultant (PG or PE) or other qualified person to prepare a soil vapor Human Health Risk Assessment for the OSP Specific Plan and 327 Harbor Site. The Human Health Risk Assessment shall evaluate the risk to future on-site residences from VOCs in on-site soil vapor. If the Human Health Risk Assessment determines that a vapor mitigation system is required for the proposed building, the qualified environmental consultant shall prepare a Vapor Mitigation Plan and shall design the vapor mitigation system for the proposed project.

The Vapor Mitigation Plan shall include, but is not limited to:

- Design specifications
- Material specifications
- Installation requirements
- Monitoring requirements

The qualified environmental consultant shall design and implement engineering measures or institutional controls (e.g., soil vapor barrier) to prevent potential soil vapor intrusion into new residences or businesses in accordance with the measures included in the DTSC's Vapor Intrusion Guidance Document – Final (October 2011) and Vapor Intrusion Mitigation Advisory, Revision 1 (October 2011), or current guidance (DTSC 2011a and 2011b).

The Applicant shall submit the Human Health Risk Assessment and Vapor Mitigation Plan to the LACFD SMU (or other designated oversight agency) for review and approval prior to construction. Design of engineering measures or institutional controls shall be submitted to the LADBS prior to the issuance of any grading or building permits. If determined to be required by the Human Health Risk Assessment, the contractor shall incorporate a sub-slab vapor barrier during construction, the implementation of which would prevent the potential for soil gas VOCs from migrating to indoor air.

The Applicant shall retain a qualified professional to certify that the required vapor measures and controls are properly constructed and functioning at the project site. The efficacy of the measures and controls shall be confirmed and certified by a qualified professional pursuant to the construction quality assurance/quality control testing guidance of the DTSC's Vapor Intrusion Guidance Document – Final (October 2011). Written verification shall be submitted to the LACFD SMU (or other designated oversight agency) and the City prior to issuance of Certificates of Occupancy.

LACFD SMU (or other designated oversight agency) may require the creation of a Soil Vapor Operations and Maintenance Plan to ensure that future operational activities (e.g., underground utility repairs), do not alter the effectiveness of the selected vapor mitigation system. LACFD SMU (or other designated oversight agency) shall review and approve the Soil Vapor Operations and Maintenance Plan (if required) prior to occupancy. The City shall review the Operations and Maintenance Plan (if required) prior to Certificates of Occupancy. The Applicant shall implement the Operations and Maintenance Plan during occupancy at the project site.

SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures HAZ-1 through HAZ-4, proper procedures for the handling, transport, and disposal of contaminated soils during construction would be in place. These measures would ensure that construction impacts related to hazards and hazardous materials would be less than significant.

As specified in Mitigation Measure HAZ-3, contaminated on-site soils would be removed from the project site prior to construction of the proposed buildings. Removal of contaminated soils could reduce VOCs in soil vapor to levels that are not a concern for the future residential and commercial development. As specified in Mitigation Measure HAZ-5, a Human Health Risk Assessment, Vapor Mitigation Plan, and/or Soil Vapor Operations and Maintenance Plan (if required by LACFD SMU or other designated oversight agency) would be prepared to determine if additional controls beyond soil removal, such as a vapor mitigation system, are required to ensure VOCs in soil vapor would not affect future on-site residents and workers. The Human Health Risk Assessment, Vapor Mitigation Plan, and/or Soil Vapor Operations and Maintenance Plan would be submitted to the LACFD SMU (or other designated oversight agency) for review and approval. Implementation of soil removal and/or vapor mitigation systems, as required by Mitigation Measures HAZ-3 and HAZ-5, would ensure that VOC concentrations are below levels that pose a risk to the health of future on-site residents and workers. These measures would ensure that hazards and hazardous materials impacts associated with operation of the Proposed Project Alternative would be less than significant.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

The Historic Rehabilitation Alternative would rehabilitate existing residential buildings on the OSP Specific Plan Site, including the removal of ACM, LBP, and PCBs. Construction would require the transport, use, storage, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). Construction of the Historic Rehabilitation Alternative would occur in compliance with the same federal, State, regional, and local regulations related to the transport, use, storage, disposal, and BMPs related to hazardous materials as the Proposed Project Alternative, described above. Compliance with these regulations would reduce the potential for construction-

related impacts associated with hazardous building materials and spills of hazardous materials at the project site.

The Historic Rehabilitation Alternative would not involve grading, excavation, or substantial ground-disturbing activities at the OSP Specific Plan Site, and contaminated soils at the OSP Specific Plan Site would not be disturbed during construction. However, similar to the Proposed Project Alternative, construction on the 327 Harbor Site under the Historic Rehabilitation Alternative would disturb contaminated soils and could result in potentially significant direct impacts related to hazardous materials.

In summary, construction of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts related to the temporary use of hazardous materials and the handling of hazardous building materials during construction. However, direct construction impacts related to the disturbance and removal of contaminated soil on the project site would be potentially significant.

OPERATIONAL EFFECTS

During operation of the Historic Rehabilitation Alternative, small amounts of hazardous materials common to residential and commercial retail development would be used, such as cleaning agents, paints, pesticides, and materials used for landscaping, which do not typically involve the use or storage of large quantities of hazardous materials. The use of hazardous materials during operation of the Historic Rehabilitation Alternative would occur in accordance with applicable requirements related to the transport, use, storage, and disposal of hazardous materials. With compliance with existing regulations, direct and indirect impacts related to the use of hazardous materials during operation would be less than significant. However, as noted above and described in detail in Section 4.6, *Hazards and Hazardous Materials*, the project site contains contaminated soils and associated soil vapors. During operation of the Historic Rehabilitation Alternative, VOCs in soil vapor could pose a threat to human health of future project residents through the migration of vapors through building floors and foundations. Therefore, direct operational impacts would be potentially significant.

MITIGATION

Because construction and operational impacts related to hazards and hazardous materials under the Historic Rehabilitation Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures HAZ-1 and HAZ-2 from Section 4.6.3, as presented under the Proposed Project Alternative above.

In addition, because the Historic Rehabilitation Alternative would not involve ground-disturbing activities at the OSP Specific Plan Site, modified versions of Mitigation Measures HAZ-3 through HAZ-5 would be required. These modified mitigation measures are presented below:

Historic Rehabilitation Alternative (HR) HAZ-3 Soil Remediation for the Historic Rehabilitation Alternative:

Where contaminated soil that exceeds hazardous waste screening levels is known to be present on the 327 Harbor Site, the Applicant shall retain a qualified environmental consultant (PG or PE) to properly remove and dispose of the contaminated soil. All soil removal and disposal activities shall be conducted in accordance with the recommendations of the SMP. The qualified environmental consultant shall utilize the project site analytical results for waste characterization purposes prior to off-site transportation or disposal of potentially impacted soils or other impacted wastes. The qualified consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other hazardous wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.

Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of sub-surface impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and off-site disposal or recycling.

Prior to initiation of soil excavation or soil remediation activities, the LACFD SMU (or other designated oversight agency) shall review and approve the soil removal and disposal recommendations prior to transportation of waste soils off site and review and approve remedial engineering controls.

The Applicant shall review and ensure the qualified environmental consultant implements the disposal recommendations prior to transportation of waste soils off site and review and implements the remedial engineering controls prior to and during construction.

The City shall review and approve the disposal recommendations and remedial engineering controls prior to issuing a grading permit.

HR HAZ-4 Construction Vapor Monitoring Plan for the Historic Rehabilitation Alternative:

The Applicant shall retain a qualified environmental consultant (PG or PE) or other qualified person to prepare a Construction Vapor Monitoring Plan. The Vapor Monitoring Plan shall specify the controls required to be implemented during construction activities at the 327 Harbor Site to mitigate the effects of subsurface gases on workers and the public. Controls could include, but are not limited to:

- Gas monitoring devices would be present to alert workers of elevated gas concentrations when basement or subsurface soil disturbing work is being performed;
- Contingency procedures would be in place if elevated gas concentrations are detected such as the mandatory use of personal protective equipment, evacuating the area, and/or increasing ventilation within immediate work area where the elevated concentrations are detected;
- Workers would be trained to identify exposure symptoms and implement alarm response actions;
- Soil exposed during excavations would be minimized to reduce the surface area which could off-gas. This will be done by staggering exposed excavation areas;
- Soil removed as part of construction will be sampled and tested for off-site disposal in a timely manner. If soil is stockpiled prior to disposal, it would be managed in accordance with the project's Storm Water Pollution Prevention Plan;
- Fencing would be established to limit public access and allow for gas dilution; and
- HASP development which would describe the work activities and hazards associated with each work activity. Hazard mitigation would be presented in the HASP to limit construction risks to workers.

- The HASP shall contain emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The HASP shall be signed by all workers on-site to demonstrate their understanding of the construction risks.

The Applicant shall submit the Construction Vapor Monitoring Plan to the LACFD SMU for review and approval. The Applicant shall submit the approved Construction Vapor Monitoring Plan to the LADBS prior to issuance of a grading permit.

HR HAZ-5 Vapor Mitigation System for the Historic Rehabilitation Alternative:

Where soil vapor is known to be present at chemical concentrations exceeding screening levels for sub-slab/soil gas (vapor) intrusion, the Applicant shall retain a qualified environmental consultant (PG or PE) or other qualified person to prepare a soil vapor Human Health Risk Assessment for the 327 Harbor Site. The Health Risk Assessment shall evaluate the risk to future on-site residences from VOCs in on-site soil vapor. If the Human Health Risk Assessment determines that a vapor mitigation system is required for the proposed building, the qualified environmental consultant shall prepare a Vapor Mitigation Plan and shall design the vapor mitigation system for the proposed project.

The Vapor Mitigation Plan shall include, but is not limited to:

- Design specifications
- Material specifications
- Installation requirements
- Monitoring requirements

The qualified environmental consultant shall design and implement engineering measures or institutional controls (e.g., soil vapor barrier) to prevent potential soil vapor intrusion into new residences or businesses in accordance with the measures included in the DTSC's Vapor Intrusion Guidance Document – Final (October 2011) and Vapor Intrusion Mitigation Advisory, Revision 1 (October 2011), or current guidance (DTSC 2011a and 2011b).

The Applicant shall submit the Human Health Risk Assessment and Vapor Mitigation Plan to the LACFD SMU (or other designated oversight agency) for review and approval prior to construction. Design of engineering measures or institutional controls shall be submitted to the LADBS prior to the issuance of any grading or building permits. If determined to be required by the Human Health Risk Assessment, the contractor shall incorporate a sub-slab vapor barrier during construction, the implementation of which would prevent the potential for soil gas VOCs from migrating to indoor air.

The Applicant shall retain a qualified professional to certify that the required vapor measures and controls are properly constructed and functioning at the project site. The efficacy of the measures and controls shall be confirmed and certified by a qualified professional pursuant to the construction quality assurance/quality control testing guidance of the DTSC's Vapor Intrusion Guidance Document – Final (October 2011). Written verification shall be submitted to the LACFD SMU (or other designated oversight agency) and the City prior to issuance of Certificates of Occupancy.

LACFD SMU (or other designated oversight agency) may require the creation of a Soil Vapor Operations and Maintenance Plan to ensure that future operational activities (e.g., underground utility repairs), do not alter the effectiveness of the selected vapor mitigation system. LACFD SMU (or other designated oversight agency) shall review and approve the Soil Vapor Operations and Maintenance Plan (if required) prior to occupancy. The City shall review the Operations and

Maintenance Plan (if required) prior to Certificates of Occupancy. The Applicant shall implement the Operations and Maintenance Plan during occupancy at the project site.

SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures HAZ-1, HAZ-1, HR HAZ-3, and HR HAZ-4, proper procedures for the handling, transport, and disposal of contaminated soils during construction would be in place. These measures would ensure that construction impacts related to hazards and hazardous materials would be less than significant.

As specified in Mitigation Measure HR HAZ-3, contaminated soils on the 327 Harbor Site would be removed prior to construction of the proposed buildings. Removal of contaminated soils could reduce VOCs in soil vapor to levels that are not a concern for the future residential and commercial development. As specified in Mitigation Measure HR HAZ-5, a Human Health Risk Assessment, Vapor Mitigation Plan, and/or Soil Vapor Operations and Maintenance Plan (if required by LACFD SMU or other designated oversight agency) would be prepared for the 327 Harbor Site to determine if additional controls beyond soil removal, such as a vapor mitigation system, are required to ensure VOCs in soil vapor would not affect future on-site residents and workers. The Human Health Risk Assessment, Vapor Mitigation Plan, and/or Soil Vapor Operations and Maintenance Plan would be submitted to the LACFD SMU (or other designated oversight agency) for review and approval. Implementation of soil removal and/or vapor mitigation systems, as required by Mitigation Measures HR HAZ-3 and HR HAZ-5, would ensure that VOC concentrations are below levels that pose a risk to the health of future on-site residents. These measures would ensure that hazards and hazardous materials impacts associated with operation of the Historic Rehabilitation Alternative would be less than significant.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

The Partial Preservation Alternative would rehabilitate 284 existing residential units on the OSP Specific Plan Site, with the remaining portions of the site demolished and redeveloped with new mixed-use buildings. Rehabilitation of existing buildings would include the removal of ACM, LCP, and PCBs in compliance with the applicable regulatory requirements. Construction of the Partial Preservation Alternative would occur in compliance with the same federal, State, regional, and local regulations related to the transport, use, storage, and disposal of hazardous materials as the Proposed Project Alternative, which would reduce the potential for construction related spills. However, similar to the Proposed Project Alternative, construction under the Partial Preservation Alternative would disturb contaminated soils on the OSP Specific Plan Site and 327 Harbor Site and could result in potentially significant direct impacts related to hazardous materials.

In summary, construction of the Partial Preservation Alternative would result in less than significant direct and indirect impacts related to the temporary use of hazardous materials and the handling of hazardous building materials during construction. However, direct construction impacts related to the disturbance and removal of contaminated soil on the project site would be potentially significant.

OPERATIONAL EFFECTS

During operation of the Partial Preservation Alternative, small amounts of hazardous materials common to residential and commercial retail development would be used, such as cleaning agents, paints, pesticides, and materials used for landscaping, which do not typically involve the use or

storage of large quantities of hazardous materials. The use of hazardous materials during operation of the Partial Preservation Alternative would occur in accordance with applicable requirements related to the transport, use, storage, and disposal of hazardous materials. With compliance with existing regulations, direct and indirect impacts related to the use of hazardous materials during operation would be less than significant. However, as noted above and described in detail in Section 4.6, *Hazards and Hazardous Materials*, the project site contains contaminated soils and associated soil vapors. During operation of the Partial Preservation Alternative, VOCs in soil vapor could pose a threat to human health of future project residents and workers through the migration of vapors through building floors and foundations. Therefore, direct operational impacts would be potentially significant.

MITIGATION MEASURES

Because construction and operational impacts related to hazards and hazardous materials under the Partial Preservation Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures HAZ-1 through HAZ-5 from Section 4.6.3, as presented under the Proposed Project Alternative above.

SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures HAZ-1 through HAZ-4, proper procedures for the handling, transport, and disposal of contaminated soils during construction would be in place. These measures would ensure that construction impacts related to hazards and hazardous materials would be less than significant.

As specified in Mitigation Measure HAZ-3, contaminated on-site soils would be removed from the project site prior to construction of the proposed buildings. Removal of contaminated soils could reduce VOCs in soil vapor to levels that are not a concern for the future residential and commercial development. As specified in Mitigation Measure HAZ-5, a Human Health Risk Assessment, Vapor Mitigation Plan, and/or Soil Vapor Operations and Maintenance Plan (if required by LACFD SMU or other designated oversight agency) would be prepared to determine if additional controls beyond soil removal, such as a vapor mitigation system, are required to ensure VOCs in soil vapor would not affect future on-site residents and workers. The Human Health Risk Assessment, Vapor Mitigation Plan, and/or Soil Vapor Operations and Maintenance Plan would be submitted to the LACFD SMU (or other designated oversight agency) for review and approval. Implementation of soil removal and/or vapor mitigation systems, as required by Mitigation Measures HAZ-3 and HAZ-5, would ensure that VOC concentrations are below levels that pose a risk to the health of future on-site residents and workers. These measures would ensure that hazards and hazardous materials impacts associated with operation of the Partial Preservation Alternative would be less than significant.

Cumulative Effects

As shown in Table 3-1 in Section 3.4, *Cumulative Development*, there are 12 cumulative projects in the vicinity of the project site. The cumulative projects include residential, retail, and restaurant development. Cumulative development has the potential to result in discharge, spills, and the disturbance of existing contamination during construction efforts. Operation of cumulative projects that would involve the substantial use or storage of hazardous materials could also result in spills or the accidental release of hazardous materials. In addition, cumulative projects would have the potential to expose future area residents, employees, and visitors to hazards by developing and redeveloping areas that may have previously been contaminated. The magnitude of hazards for

individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites.

Construction of the cumulative projects would temporarily increase the regional transport, use, storage, and disposal of construction-related hazardous materials and petroleum products. Similar to the project alternatives, operation of the cumulative projects would involve the use of hazardous materials commonly used in residential and commercial developments, which do not typically involve the use or storage of large quantities of hazardous materials. Construction and operational activities associated with the cumulative projects and the project alternatives would be required to comply with applicable federal, State, regional, and local regulations for proper transport, use, storage, and disposal of hazardous materials and waste. Likewise, future projects on contaminated project sites would be required to comply with federal, State, regional, and local requirements related to remedial action and implement mitigation measures, similar to the project alternatives, as necessary. Therefore, significant cumulative impacts related to hazards and hazardous materials are not anticipated, and the project alternatives' contributions would not be cumulatively considerable.

7.4.8 Historic Resources

Potential impacts on historic resources were evaluated based on changes to the character-defining features of the resources, which are the characteristics of a historic property that qualify it for inclusion in the National Register of Historic Places (NRHP). This approach is derived from the Secretary's Standards and the regulations of the Advisory Council on Historic Preservation implementing provisions of the National Historic Preservation Act of 1966 (NHPA; 16 U.S.C. 470 et seq.).

Historic properties are those that are listed in or eligible for listing in the NRHP. The NRHP is a list of districts, sites, buildings, structures, and objects that have been determined by the National Park Service (NPS) to be significant in American history, architecture, archaeology, engineering, and culture, at the local, State, or national level. Generally, a property must be at least 50 years old to qualify but there are exceptions. The grantee should consult the NRHP database, existing State and local inventories, local historical and preservation organizations, and local planning departments to identify properties that are listed in or eligible for the NRHP.

All HUD-assisted activities require Section 106 review except projects that are exempt or "categorically excluded not subject to" under HUD regulations (24 CFR Parts 50 and 58) or that are determined by HUD to have "No Potential to Affect Historic Properties" as defined at 36 CFR 800.3.

Affected Environment

As discussed in Section 4.3, *Cultural Resources*, two cultural/historic resources studies were conducted to evaluate potential historic resources on the project site and within the Area of Potential Effects (APE) for the project¹⁴. These cultural/historic resources studies were conducted in accordance with the requirements set forth in Section 106 of the NHPA. As identified in Section 4.3.2, the project site contains one historic resource listed or eligible for listing in the NRHP: the Rancho San Pedro Complex. In addition, the APE contains five historic built-environment resources that are either listed in or eligible for listing in the NRHP. These include the Ralph J. Scott Fireboard, San Pedro Municipal Ferry Building, Los Angeles Cruise Terminal, Senator William H. Savage House, and 103 North Mesa Street. There is also one archaeological resource within the APE, Mexican Hollywood,

¹⁴ The APE was established in accordance with 36 CFR Part 800.3 and in consultation with the State Historic Preservation Officer (SHPO).

which has been recommended eligible for listing in the NRHP. For additional details regarding existing historic and archaeological resources, the reader is referred to Section 4.3.2.

Regulatory Setting

The following laws and regulations related to historic preservation are discussed in Section 4.3.1:

- National Historic Preservation Act
- Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings (36 CFR Part 68)

According to Section 106 of the NHPA, adverse effects to historic properties are determined by applying the Criteria of Adverse Effects, which is included below for reference.

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative (36 CFR Section 800.5).

As indicated by 36 CFR Section 800.5, adverse effects to historic properties include but are not limited to the following:

- Physical destruction of or damage to all or part of the property;
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access that is not consistent with the Secretary's Standards and applicable guidelines;
- Removal of the property from its historic location;
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to historic resources are provided in Table 7-24.

Table 7-24 Historic Resources Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
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No Impact	Direct Effect	Would not result in a direct change to, or impact on, any historic property listed on or identified as eligible or potentially eligible for listing on the NRHP
	Indirect Effect	Would not alter the viewshed, acoustic environment, or general environment of any historic property
	Applies to All Effect Types	- Would result in no discernable changes to historic properties in the region or locality - Would only alter historic properties for an indiscernible or negligible period of time
Less Than Significant	Direct Effect	Would result in only a temporary impact to a historic property
	Indirect Effect	Would result in only a temporary impact to the viewshed, acoustic environment, or general environment of a historic property
	Applies to All Effect Types	- Historic properties would only be altered for a short, finite period - Impacts would not exceed significance thresholds identified in 36 CFR Part 800
Potentially Significant	Direct Effect	- Would result in substantial change to the character-defining features of a historic property listed on, or identified as potentially eligible for listing on, the NRHP - Would result in physical destruction or damage to a historic or archeological resource - Would damage or disturb human remains, whether historic or prehistoric
	Indirect Effect	- Would result in substantial alteration of a historic property's viewshed, acoustic environment, or other environmental component, notably affecting an element that contributes to the significance of a historic property - Would substantially increase traffic volume in the vicinity of a historic property
	Applies to All Effect Types	Would result in impact that would exceed significance thresholds identified in 36 CFR Part 800
Beneficial	Direct Effect	Would increase the protection of a historic property over the long-term
	Indirect Effect	Would remove or reduce existing visual, acoustic, or other environmental component currently degrading a historic property
	Applies to All Effect Types	Would enhance or improve the cultural resources environment of, or cultural resources within, the study area

The NHPA directs each federal agency, and those tribal, State, and local governments that assume federal agency responsibilities, to protect historic properties and to avoid, minimize, or mitigate possible harm that may result from agency actions. The review process, known as Section 106 review, is detailed in 36 CFR Part 800. Early consideration of historic places in project planning and full consultation with interested parties are key to effective compliance with Section 106. SHPO and/or the Tribal Historic Preservation Officer are primary consulting parties in the process. A qualified historic preservation consultant may assist with the technical components of the Section 106 review process.

Compliance with Section 106 is achieved by following the procedures that the Advisory Council on Historic Preservation has outlined in 36 CFR Part 800. After determining the need to conduct a Section 106 review, the HUD official or Responsible Entity: (1) initiates consultation with statutory and other interested parties; (2) identifies and evaluates historic properties within the APE; (3) assesses effects of the project on properties listed on or eligible for the NRHP; and (4) resolves any adverse effects through project design modifications or mitigation. At the conclusion of the Section 106 review process, SHPO will issue a concurrence letter documenting a determination of either: (1) No Historic Properties Affected; (2) No Adverse Effect; or (3) Adverse Effect.

Potential effects to built environment historic properties in the APE as a result of the project include those directly related to the construction, permanent noise and vibration effects, permanent visual effects, and permanent property takes and easements. The APE is divided into a direct APE and an indirect APE. The direct APE encompasses all areas where construction activities and staging would occur. The indirect APE includes all areas that may be subject to potential visual, noise, vibration, or ground settlement effects that may result from construction or implementation of the project. The indirect APE is defined as the first row of adjacent parcels surrounding the direct APE.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not alter any existing on-site uses or involve demolition of the Rancho San Pedro Complex on the OSP Specific Plan Site. The No Project Alternative also would not impact any other historic resource, including archaeological resources, listed or eligible for listing in the NRHP in the vicinity of the project site. The No Project Alternative also would not have the potential to disturb human remains. As a result, the No Project Alternative would result in no direct or indirect impact to historic resources.

Proposed Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

Construction of the Proposed Project Alternative has the potential to result in direct impacts to historic resources on the project site (direct APE) and indirect impacts to historic resources located in proximity to the project site (indirect APE). The Proposed Project Alternative would include demolition of the Rancho San Pedro Complex, resulting in a direct adverse effect to a historic resource. In addition, although no known archaeological resources or human remains have been identified on the project site and the site has been previously disturbed, there is the potential for ground-disturbing construction activities to result in a direct adverse effect to previously unknown

archaeological resources and human remains. Upon completion of construction activities, ground-disturbing activities would cease, and operation of the Proposed Project Alternative would not result in impacts to archaeological resources or human remains. Direct impacts to historic and archaeological resources (including human remains) would be potentially significant.

As described in detail in Section 4.2, *Cultural Resources*, the Proposed Project Alternative would not result in temporary or permanent noise, vibration, or visual effects that would materially alter in an adverse manner the characteristics of the historic and archaeological resources within the indirect APE that convey their historical significance and justify their eligibility for historic designation. Therefore, indirect impacts to historic resources would be less than significant. In summary, the Proposed Project Alternative would result in potentially significant direct impacts and less than significant indirect impacts to historic resources.

MITIGATION MEASURES

Because impacts to historic and archaeological resources under the Proposed Project Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures CUL-1 through CUL-6 from Section 4.3.3, as listed below:

CUL-1 Interpretive Display:

HACLA shall ensure that the Project Applicant prepares and installs an interpretive display in the Phase 1 Community Room, which will be open to the community. The interpretive display shall be completed to coincide with the opening of the Phase 1 Community Room. It shall include a brief history of the historical resource, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the project which led to the demolition of the historical resource. The display shall be professionally written, illustrated, and designed, and shall include the website address associated with the informational website created by implementation of Mitigation Measure CUL-2. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for History or Architectural History. The Interpretive Display may be rotated amongst Community Rooms and/or public outdoor spaces throughout the OSP Specific Plan Site with approval by HACLA.

CUL-2 Informational Website:

HACLA shall add to its existing website a section dedicated to the history of Rancho San Pedro Complex and public housing in Los Angeles within six months of the issuance of the Certificate of Occupancy for the Phase 1 Community Room. The website shall be maintained by HACLA and shall provide content on the history of Rancho San Pedro Complex, the significance of public housing in the city, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of the site within the context of public housing in the city. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for History or Architectural History and shall be periodically updated, as needed, if new scholarly information related to the history or significance of Rancho San Pedro and public housing become available following the initial publishing of the website.

CUL-3 Project Archaeologist:

HACLA shall retain a Project Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology to ensure mitigation and/or conditions of approval for the project, as they relate to archaeological resources, are completed. The Project Archaeologist shall oversee and implement the Worker's Environmental Awareness Program (WEAP) and cultural resources monitoring (Mitigation Measures CUL-4 and CUL-5). The Project Archaeologist shall be responsible for preparing and executing any testing and/or reporting programs necessary in the event of a find during project execution.

CUL-4 Worker's Environmental Awareness Training:

A qualified archaeologist and Native American representative shall be retained to conduct a WEAP training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities associated with the project. The training shall be conducted by an archaeologist who meets or exceeds the Secretary of the Interior's Professional Qualification Standards for Archaeology (NPS 1983) and a locally affiliated Native American representative. Archaeological sensitivity training shall include a description of the types of cultural materials that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment of materials in the event of a find.

CUL-5 Archaeological Monitoring:

Working under the direct supervision of the Project Archaeologist, an archaeological monitor shall be present during ground-disturbing activity for project construction, including but not limited to site clearing, grubbing, demolition, trenching, and excavation, for the duration of the aforementioned activities or until the Project Archaeologist, in consultation with HACLA and monitoring tribes, determines monitoring is no longer necessary (e.g., initial ground disturbance is complete, soils are sterile for cultural resources). The archaeological monitor shall prepare daily logs to be submitted at the completion of the project as part of the Cultural Resources Monitoring Report. In the event that previously unidentified prehistoric or historical archaeological materials or human remains are encountered during project construction, the archaeological monitor shall retain the authority to halt and/ or redirect work up to 100 feet away from the discovery until an evaluation of the resource is complete and the location of the find has been cleared for further activity by the Project Archaeologist.

A Native American monitor representing one of the consulting Native American Tribes shall be present during ground-disturbing activity for project construction, including but not limited to site clearing, grubbing, demolition, trenching, and excavation, for the duration of the proposed project or until the Project Archaeologist determines monitoring is no longer necessary. The Native American monitor shall prepare daily logs and submit weekly updates to the Project Archaeologist. In addition, the Native American monitor shall prepare and submit a summary statement upon completion of monitoring to include in the Cultural Resources Monitoring Report prepared for the project. The Project Archaeologist and HACLA shall review and include the statement as part of the Cultural Resources Monitoring Report prepared for the project.

At the completion of monitoring, the Project Archaeologist shall prepare a Cultural Resources Monitoring Report to document the findings during the monitoring effort for the project. The report shall include the monitoring logs completed for the project and document any discoveries made during construction monitoring. The report shall also include the monitoring logs prepared by the

Native American monitor for the project. The Cultural Resources Monitoring Report shall be submitted to HACLA and the South Central Coastal Information Center (SCCIC).

CUL-6 Inadvertent Discovery of Archaeological Resources:

If cultural resources are encountered during ground-disturbing activities that have not been previously identified, work in a 100-foot radius of the find shall be halted and redirected. The Project Archaeologist or the archaeological monitor shall provide recommendations regarding the resource's potential significance and potential treatment in consultation with the Native American monitor. If the discovery is identified to be a site (generally more than three artifacts), the evaluation shall require preparation of an Archaeological Testing Plan (ATP) to determine if the resource qualifies for California Register Historic Resources (CRHR) and/or NRHP listing. Such evaluations will be used to determine if the project may have a significant impact/adverse effect on the resource. Following the execution of the ATP, if the lead agency in consultation with the Project Archaeologist, determines the discovery is significant and cannot be avoided by the project, additional work such as an Archaeological Data Recovery Program (ADRP) shall be completed prior to the resumption of ground-disturbing activities in the immediate area to mitigate any significant impacts to cultural resources. The ATP and ADRP are described in further detail below.

NRHP/CRHR criteria for evaluating the significance of archaeological resources shall be used in the event a cultural resource is discovered. If resources are discovered that the Project Archaeologist recommends the resource meets the significance criteria of NRHP Criterion D and or the CRHR Criterion 4, and if preservation in place is not feasible, an ADRP shall be implemented. If resources are found to meet NRHP criteria A and/or B and/or C and or the CRHR criteria 1 and/or 2 and/or 3, then representatives of the appropriate descent community or the appropriate community members shall be notified upon the determination.

- **Archaeological Testing Plan:**

The purpose of the ATP will be to determine the extent and possible presence/absence of archaeological resources and to identify whether the resources constitute an historic property or historical resource using the criteria of the NRHP/CRHR.

- The ATP shall be conducted in accordance with an approved ATP that will be reviewed by the consulting Native American Tribes.
- At the completion of the ATP, the Project Archaeologist and Staff Archaeologists shall submit a written report of the findings.
- If the Project Archaeologist determines that a significant archaeological resource is present and that the resource could be adversely affected by the project, at the discretion of the project sponsors either:
 - The project shall be re-designed as to avoid any adverse effects; or
 - A data recovery program shall be implemented.

- **Archaeological Data Recovery Program (ADRP):**

Should a cultural resource that qualified for NRHP/CRHR listing under Criterion D/4 for data potential be identified and cannot be avoided by the project, an ADRP shall be completed to comprehensively document the resource and exhaust the data potential. The ADRP shall be conducted by the Project Archaeologist in accordance with the California OHP's 1990 *Archaeological Resource Management Reports: Recommended Contents and Format*.

Prior to implementing the field component of the ADRP, a Data Recovery Plan (Plan) shall be prepared by the Project Archaeologist selected to carry out the ADRP. The Plan shall be prepared in consultation with Native American groups who have participated in consultation for the project and reviewed and approved by HACLA. The Plan shall, at minimum, include the following:

- Field Methods and Procedures
- Thresholds for Achieving Data Redundancy
- Cataloguing and Laboratory Analysis
- Discard and Deaccession Policy
- Interpretive Program
- Security Measures
- Final Report
- Curation

CUL-7 Discovery of Human Remains:

In the event human remains are unexpectedly discovered at any time during the implementation of the project, HACLA, the Project Archaeologist and the project sponsors shall follow the California Health and Human Safety Code Section 7050.5, which states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. Therefore, in the event of an unanticipated discovery of human remains, the Los Angeles County Coroner must be notified immediately. If the human remains are determined to be Native American, the Coroner will notify the NAHC, which will determine and notify a MLD. The MLD shall complete the inspection of the site within 48 hours of being granted site access to make recommendations. The landowner shall reinter the remains in an area of the property secure from subsequent disturbance.

SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measures CUL-1 and CUL-2 would mitigate impacts to the Rancho San Pedro Complex to the greatest extent feasible. However, because compliance with the Secretary's Standards or avoidance is not possible, legal precedent has established that such measures cannot mitigate impacts to a level of less than significant because the loss of historical fabric cannot be readily compensated for by commemorative mitigation¹⁵. Therefore, impacts to a historical resource, specifically, the Rancho San Pedro Complex, would remain significant and unavoidable.

Mitigation Measures CUL-3 through CUL-7 would ensure that proper procedures are in place in the event that archaeological resources or human remains are discovered during construction activities. With implementation of mitigation, potential impacts to previously unknown archaeological resources and human remains during construction of the Proposed Project Alternative would be reduced to a less than significant level.

Historic Rehabilitation Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The Historic Rehabilitation Alternative would rehabilitate Rancho San Pedro in conformance with the Secretary's Standards. Compliance with these standards would ensure the Rancho San Pedro Complex

¹⁵ League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland (1997) 52 Cal.App.4th 896.

is rehabilitated in a manner that preserves its historic character-defining qualities. Direct impacts to the Rancho San Pedro Complex would be less than significant under the Historic Rehabilitation Alternative. Temporary and permanent impacts to historic resources within the indirect APE would also be less than significant. However, similar to the Proposed Project Alternative, ground-disturbing construction activities would occur on the 327 Harbor Site, which could result in potentially significant impacts to archaeological resources.

MITIGATION MEASURES

Because impacts to archaeological resources under the Historic Rehabilitation Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures CUL-3 through CUL-6 from Section 4.3.3, as presented under the Proposed Project Alternative above.

SIGNIFICANCE AFTER MITIGATION

Mitigation Measures CUL-3 through CUL-6 would ensure that proper procedures are in place in the event that archaeological resources or human remains are discovered during construction activities. With implementation of mitigation, potential impacts to previously unknown archaeological resources or human remains during construction of the Historic Rehabilitation Alternative would be reduced to a less than significant level.

Partial Preservation Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The Partial Preservation Alternative would rehabilitate the originally-constructed portion of Rancho San Pedro in conformance with the Secretary's Standards. Although a portion of the Rancho San Pedro Complex would be preserved, the remainder of the site would be demolished and redeveloped, resulting in a direct adverse effect to a historic resource. In addition, ground-disturbing construction activities would result in potentially significant impacts to previously unknown archaeological resources and human remains. Direct impacts to historic and archaeological resources would be potentially significant.

The Partial Preservation Alternative would not result in temporary or permanent noise, vibration, or visual effects that would materially alter in an adverse manner the characteristics of the historic and archaeological resources within the indirect APE that convey their historical significance and justify their eligibility for historic designation. Therefore, indirect impacts to historic and archaeological resources would be less than significant. In summary, the Partial Preservation Alternative would result in potentially significant direct impacts and less than significant indirect impacts to historic resources.

MITIGATION MEASURES

Because impacts to historic and archaeological resources under the Partial Preservation Alternative would be potentially significant, the project Applicant would be required to implement Mitigation Measures CUL-1 through CUL-7 from Section 4.3.3, as presented under the Proposed Project Alternative above.

SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measures CUL-1 and CUL-2 would mitigate impacts to the Rancho San Pedro Complex to the greatest extent feasible. However, because portions of the site would be demolished, impacts to a historical resource, specifically, the Rancho San Pedro Complex, would remain significant and unavoidable.

Mitigation Measures CUL-3 through CUL-7 would ensure that proper procedures are in place in the event that archaeological resources or human remains are discovered during construction activities. With implementation of mitigation, potential impacts to previously unknown archaeological resources and human remains during construction of the Partial Preservation Alternative would be reduced to a less than significant level.

Cumulative Effects

As described in detail in Section 4.3.4, cumulative impacts to built environment historic resources would occur if multiple properties of a similar class as the Rancho San Pedro Complex, Garden Apartment-style public housing complexes, were subject to individual impacts. Although projects in the cumulative projects list do not include any alterations to Garden Apartment-style public housing complexes, it is unknown whether other proposed projects outside of the cumulative project's radius would cause impacts to properties of this class. It is reasonably foreseeable that redevelopment, rehabilitation, or other activities carried out by HACLA or other entities would involve Garden Apartment-style public housing complexes. It is possible such projects would result in impacts to Garden Apartment-style public housing complexes that qualify as historical resources, diminishing the number of historical resources significant in the same historical context as the Rancho San Pedro Complex. The No Project and Historic Rehabilitation Alternatives would preserve the Rancho San Pedro Complex and would not result in a cumulatively considerable contribution to cumulative impacts to built environment historic resources. However, the Proposed Project and Partial Preservation Alternatives would contribute to cumulatively considerable impacts to built environment historical resources by demolishing the entirety or portions of the Rancho San Pedro Complex.

Cumulative projects would increase the potential for impacts to buried archaeological historical resources and human remains through construction activities in the area. However, such impacts are generally site-specific and project-specific mitigation for cumulative development projects would limit this impact to less than significant. As described above, the No Project Alternative would result in no impact to archaeological resources and human remains. Likewise, implementation of Mitigation Measures CR-3 through CR-7 under the remaining project alternatives would ensure the project would not result in significant impacts to archaeological resources and human remains. Therefore, cumulative impacts to archaeological historical resources and human remains would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

7.4.9 Land Use and Planning

This section analyzes the potential impacts of the project alternatives on existing land uses and land use planning in the project area. Impacts related to land use can be either direct or indirect. Direct impacts could result from proposed land acquisitions, either via permanent easement or temporary easement, associated with a project alternative; such impacts could alter land uses or conflict with existing land use plans. Indirect impacts would occur if a project alternative would cause long-term changes to land use or land use planning, not immediately caused by project installation. Such an impact would occur if a project alternative could result in changes in land use planning or land use classifications in the future in the project area. Any potential changes to zoning patterns or categories due to land acquisition associated with a project alternative also would be an indirect impact.

7.4.9.1 Affected Environment

As described in Section 4.8, *Land Use and Planning*, the project site is within the boundary of the San Pedro Community Plan Area (CPA). Land use designations within the OSP Specific Plan Site include Low Medium II Residential and Community Commercial, which as described in the General Plan Framework Element, generally allow multi-family residential development of 18 to 29 dwelling units per acre, as well as commercial uses such as hotels, restaurants, and retail. The land use designation of the 327 Harbor Site is Community Commercial, which allows commercial, residential, and mixed-use development.

The project site is also within the Pacific Corridors Redevelopment Plan Area. Under the Pacific Corridors Redevelopment Plan, the OSP Specific Plan Site is designated as Residential, which allows single- and multi-family housing. Additionally, pursuant to Section 502 of the Pacific Corridors Redevelopment Plan, the allowable land uses are those permitted by the General Plan and Community Plan, including any amendments.

The OSP Specific Plan Site is zoned Low-Medium II Residential (RD1.5-1XL-CPIO¹⁶), which allows multi-family residential development of 1,500 sf of lot area per dwelling unit, a height limit of 30 feet, and a maximum floor area ratio (FAR) of 3:1, and Community Commercial (C2-2D-CPIO¹⁷). The 327 Harbor Site is zoned Community Commercial ([T][Q]C2-2D-CPIO¹⁸), which permits commercial uses such as hotels, restaurants, and retail; multi-family residential development; a height limit of 69 feet; and a maximum FAR of 6:1.

For additional details regarding the project site's land use designations and zoning, the reader is referred to Section 4.8.1.

¹⁶ The '1XL' refers to the 'Extra Limited' height district and the 'CPIO' indicates the OSP Specific Plan Site is governing by the San Pedro Community Plan Implementation Overlay.

¹⁷ The '2' of 2D refers to the height district and the 'D' indicates there is a development limitation. The 'CPIO' indicates the OSP Specific Plan Site is governed by the San Pedro Community Plan Implementation Overlay.

¹⁸ The 'T' indicates there is a Tentative Classification on the parcel that will be removed by the recordation of a final parcel or tract map. The 'Q' indicates there are Qualified Conditions of Approval imposed on the use of the property. The 'D' indicates there are Development Conditions imposed on the use of the property.

Regulatory Setting

The following laws, regulations, and plans applicable to land use and planning are discussed in Section 4.8.2:

- California Government Code Section 65302
- California Sustainable Communities and Climate Protection Act of 2008 (California SB 375)
- SCAG 2020-2045 RTP/SCS
- South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP)
- Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Management Program
- City of Los Angeles General Plan
- San Pedro Community Plan
- LAMC
- Pacific Corridors Redevelopment Plan
- Citywide Design Guidelines

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to land use and planning are provided in Table 7-25.

Table 7-25 Land Use and Planning Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	▪ No change to existing development, land use, or zoning patterns
	Indirect Effect	▪ No conflicts with existing or planned land uses in the study area
	Applies to All Effect Types	▪ No discernable changes in the region or locality ▪ Land use would be altered for a negligible period of time
Less Than Significant	Direct Effect	▪ Would result in minimal changes to existing development, land use, or zoning patterns that would not result in displacements or substantial long-term changes
	Indirect Effect	▪ New land use would differ from, but not be inconsistent with, surrounding land use patterns ▪ Would result in minimal restrictions to land use options for surrounding land uses ▪ Would result in minimal conflicts with existing or planned land uses or changes to zoning in the study area that would not result in displacements or substantial long-term changes
	Applies to All Effect Types	▪ Land use would only be altered for the duration of the construction phase or a portion of the operations phase
Potentially Significant	Direct Effect	▪ Would physically divide established communities ▪ Would substantially change the character of existing land use types or the ability of lands to function for their existing or planned uses
	Indirect Effect	▪ Would conflict with surrounding land use patterns to the extent that those patterns would substantially change ▪ Would substantially restrict land use options for surrounding land uses

Impact Level	Type of Effect	Impact Description
Beneficial	Applies to All Effect Types	Would result in adverse impacts observed throughout affected municipalities
	Direct Effect	Would improve utility of a particular land use type or locality
	Indirect Effect	Would increase compatibility with surrounding land use types
	Applies to All Effect Types	Would result in land use benefits observed throughout affected municipalities

The project alternatives were evaluated for consistency and compatibility with existing and proposed land uses, zoning, and land use plans applicable to the project site, as listed above under “Regulatory Setting.” Proposed land uses were determined through reviews of existing plans.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not change the existing land uses, zoning, or occupancy of the project site. As no new development would occur on the project site, the No Project Alternative would not conflict with any adopted plans or be inconsistent with existing land uses and zoning within and near the project site. Therefore, the No Project Alternative would result in no direct or indirect impacts related to land use and planning.

Proposed Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The Proposed Project Alternative would involve adoption of the OSP Specific Plan, which would change the land use designation and zoning of the OSP Specific Plan Site and increase the allowable density and heights of development on the OSP Specific Plan Site. With the City’s approval of the proposed OSP Specific Plan, General Plan Amendment, and Zone and Height District Change, the Proposed Project Alternative would not conflict with applicable provisions of the LAMC and zoning code. The proposed development on the 327 Harbor Site would conform to the existing permitted land uses and zoning regulations.

As described in Section 4.8.3, the Proposed Project Alternative would not conflict with the applicable goals and policies of land use plans, including the City’s General Plan, the San Pedro Community Plan, the Pacific Corridors Redevelopment Plan, and SCAG’s 2020-2045 RTP/SCS. Although the Proposed Project Alternative would alter the zoning and increase the density, massing, and building heights on the project site and would introduce new mixed-uses, this would align with other recent development in the San Pedro community and with the goals and policies contained in the applicable land use plans. The OSP Specific Plan would transition the types and intensities of land uses from the Barton Hill residential neighborhood to the north and west, to the Downtown commercial and civic core of San Pedro to the south and east, while upgrading buildings, amenities, and safety on the project site. Upon buildout, the project site would be consistent in height and density with nearby buildings, including the Port of Los Angeles Administrative Building off Palos Verdes Street. The Proposed Project Alternative would not include land use and zoning changes that result in substantially different land use patterns or physically divide the community.

Based on the reasons described above, the Proposed Project Alternative would result in less than significant direct and indirect impacts related to land use and planning.

Historic Rehabilitation Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The Historic Rehabilitation Alternative would not implement the OSP Specific Plan Site or change the density, height, or massing of existing buildings on the OSP Specific Plan Site. Rehabilitation of existing buildings on the OSP Specific Plan Site would not interfere with the existing Low Medium II Residential (RD1.5-1XL-CPIO) and Community Commercial (C2-2D-CPIO) land use designations on the OSP Specific Plan Site. Development proposed on the 327 Harbor Site would also conform to the permitted land uses and zoning requirements. The project would not include land use and zoning changes that result in substantially different land use patterns or the physical division of the community. As the Historic Rehabilitation Alternative would construct a project consistent with the existing general plan designations and zoning of the project site, this alternative would not conflict with applicable plans, policies, and regulations, including those set forth by the City's General Plan, the San Pedro Community Plan, the Pacific Corridors Redevelopment Plan, and SCAG's 2020-2045 RTP/SCS. Therefore, the Historic Rehabilitation Alternative would result in no direct or indirect impacts related to land use and planning.

Partial Preservation Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The Partial Preservation Alternative would involve adoption of a modified version of the OSP Specific Plan, which would change the zoning of the OSP Specific Plan Site and increase the allowable density and heights of development on the site. The modified OSP Specific Plan would regulate the OSP Specific Plan Site's permitted land uses, circulation, open space, and development standards that would transition the types and intensities of land uses within the project site and in the surrounding community to the extent feasible. The Partial Preservation Alternative would constitute a conforming land use with the adoption of the modified OSP Specific Plan, General Plan Amendment, and Zone and Height District Change. Development proposed on the 327 Harbor Site would also conform to the permitted land uses and zoning requirements.

The Partial Preservation Alternative would include similar uses and characteristics as the Proposed Project Alternative and would not conflict with the applicable goals and policies of land use plans, including the City's General Plan, the San Pedro Community Plan, the Pacific Corridors Redevelopment Plan, and SCAG's 2020-2045 RTP/SCS. Although the Historic Rehabilitation Alternative would alter the zoning and increase the density, massing, and building heights on the project site and would introduce new mixed-uses, this would align with other recent development in the San Pedro community and with the goals and policies contained in the applicable land use plans. The OSP Specific Plan would transition the types and intensities of land uses from the Barton Hill residential neighborhood to the north and west, to the Downtown commercial and civic core of San Pedro to the south and east, while upgrading buildings, amenities, and safety on the project site. Upon buildout, the project site would be consistent in height and density with nearby buildings, including the Port of Los Angeles Administrative Building off Palos Verdes Street. The Partial Preservation Alternative would not include land use and zoning changes that result in substantially different land use patterns or physically divide the community.

Cumulative Effects

As discussed in Section 3.4, *Cumulative Development*, there are 12 additional projects considered in the cumulative impact analysis. The cumulative projects consist of infill development, including apartments, mixed-use, retail, office, and hotel uses, within urbanized areas of San Pedro containing similar existing uses. Similar to the project alternatives, these infill projects would not include features that would divide the San Pedro community, such as new major roadways, railways, or incompatible uses, nor would the cumulative projects result in radically different land use patterns than what currently exists. Impacts with respect to conflicts with land use plans are generally project- and site-specific. Similar to the project alternatives, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to environmental review. The project alternatives would not conflict with the overall intent of the applicable goals, objectives, and policies from the planning documents that regulate land use and development in the project area. As such, cumulative impacts related to plan inconsistency would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

7.4.10 Noise and Vibration

This section analyzes the potential impacts of the project alternatives on the noise and vibration environment in the project area. A direct impact would occur if a project alternative directly changes the existing noise environment of the study area, which could occur by introducing new noise-generating sources in the environment. An indirect impact would occur if a project alternative induces other changes that could affect the local noise environment. For example, should a project alternative contribute to future increased development of the study area that could produce noise (e.g., through traffic increases), an indirect impact would occur. Similarly, should a project alternative result in the need to reroute traffic, an indirect impact to the local noise environment could occur along the rerouted path.

7.4.10.1 Affected Environment

As discussed in Section 4.9, *Noise*, the primary source of noise is generated by traffic on Harbor Boulevard. At project site locations farther west from Harbor Boulevard, existing noise sources include sparse local traffic movements, human activities such as lawn mowing, occasional distant aircraft overflights, barking dogs, and chirping birds. Noise sensitive receptors near the OSP Specific Plan Site include several multi-family residences located to the north, west, and south, and Port of Los Angeles High School approximately 300 feet to the south. Noise receptors near the 327 Harbor Site include multi-family residences located approximately 230 feet to the west along Palos Verdes Street and multi-family residences located approximately 180 feet southwest of the 327 Harbor Site along North Beacon Street. In addition, multifamily residences are currently under construction approximately 60 feet west of the 327 Harbor Site, on the parcel across Beacon Street. Ambient noise levels at the project site range from approximately 51.1 A-weighted decibels (dBA) L_{eq} ¹⁹ to approximately 67.7 dBA L_{eq} . Existing traffic noise levels range from approximately 60 dBA Community Noise Equivalent Level (CNEL)²⁰ and 72 dBA CNEL. For additional details regarding existing noise at the project site, the reader is referred to Section 4.9, *Noise*, and Appendix G of this EIR/EIS.

¹⁹ The equivalent sound level over a specified period of time, typically, 1 hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.

²⁰ The Community Noise Equivalent Level (CNEL) is the time average A-weighted noise level during a 24-hour day that includes an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. the next day to account for noise sensitivity in the evening and nighttime, respectively.

Regulatory Setting

The following laws and regulations applicable to noise and vibration are discussed in Section 4.9.2:

- Federal Noise Control Act of 1972
- Federal Occupational Safety and Health Act of 1970
- Federal Transit Administration Vibration Standards

A discussion of additional federal regulations related to noise is provided below.

Code of Federal Regulations Title 24, Part 51

HUD sets environmental criteria and standards in Title 24 of the CFR, Part 51. New construction proposed in areas that exceed 65 dBA L_{dn} ²¹ must incorporate noise attenuation features to maintain interior noise levels at 45 dBA L_{dn} . Development in areas exceeding 65 dBA L_{dn} requires further attenuation features. In general, the HUD regulations match the California state regulations discussed below. Common outdoor use areas and private outdoor use areas would be subjected to the exterior noise limit standard of 65 dBA L_{dn} .

According to HUD, additional review and analysis is required for projects located within 1,000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or civilian airport. The project itself is considered a noise-sensitive use because it involves construction of residential uses.

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to noise and vibration are provided in Table 7-26.

Table 7-26 Noise and Vibration Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	▪ Would not result in a discernible change in noise or vibration levels during construction or operational activities ▪ Increased noise or vibration levels would occur but would comply with applicable regulations or no applicable regulations exist
	Indirect Effect	▪ Would not result in a discernible change in noise or vibration levels due to re-routed traffic or other activities ▪ Would not induce other activities that would alter the local noise or vibration environment
	Applies to All Effect Types	▪ Would not result in discernable changes to the noise or vibration conditions in the region or locality ▪ Would only alter noise or vibration conditions for an indiscernible or negligible period of time

²¹ The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dBA to measured noise levels between the hours of 10:00 p.m. to 7:00 a.m. the next day to account for nighttime noise sensitivity.

Impact Level	Type of Effect	Impact Description
Less Than Significant	Direct Effect	- Would result in vibration levels between the perceptible and annoyance thresholds due to construction and operational activities - Would result in a change in noise levels due to increased traffic or other activities that would not exceed applicable City of Los Angeles regulations
	Indirect Effect	- Would result in vibration levels between the perceptible and annoyance thresholds due to re-routed traffic or other activities - Would result in a change in noise levels due to re-routed traffic or other activities that would not exceed that applicable City of Los Angeles regulations
	Applies to All Effect Types	- Impacts would be localized in specific areas - Noise or vibration conditions would only be altered for a short, finite period
Potentially Significant	Direct Effect	- Would result in vibration levels above the architectural damage and annoyance thresholds - Would result in noise levels that exceed applicable City of Los Angeles thresholds
	Indirect Effect	- Would result in vibration levels above the architectural damage and annoyance thresholds due to re-routed traffic or other activities - Would result in a change in noise levels due to re-routed traffic or other activities that would exceed the applicable City of Los Angeles regulations
	Applies to All Effect Types	- Would result in adverse noise or vibration impacts observed throughout affected municipalities - Would permanently adversely alter noise or vibration conditions in the study area
Beneficial	Direct Effect	Would result in a decrease in noise or vibration levels during construction or operational activities
	Indirect Effect	- Would result in a reduction in noise or vibration levels due to re-routed traffic - Would induce other activities that would decrease noise or vibration in the study area
	Applies to All Effect Types	Would result in noise or vibration reductions in the study area

Noise

HUD's guidance for assessing significant impacts related to noise is to consider:

1. Are there potential noise generators in the vicinity of the project?

Review general location maps and/or conduct a field review to screen for major roadways (within 1,000 feet), railroads (within 3,000 feet), and military or Federal Aviation Administration (FAA)-regulated airfields (within 15 miles) in the vicinity of the project.

If within those distances, provide documentation showing the noise level is Acceptable (at or below 65 DNL) or there is an effective noise barrier (i.e., that provides sufficient protection).

2. If a noise assessment was performed, was the noise found to be Acceptable, Normally Unacceptable, or Unacceptable?

HUD's policy is to provide minimum national standards to protect citizens against excessive noise in the communities and places of residence; to encourage noise compatible land use planning in relation to airports, highways, railroads, and other sources of high ambient noise; and to encourage the control of noise at its source in cooperation with other federal departments and

agencies. HUD’s exterior noise compatibility standards are located in 24 CFR Part 51, Subpart B, Noise Abatement and Control. Table 7-27 shows the noise level acceptability standards for project sites and the special approvals and/or requirements for Acceptable, Normally Unacceptable, or Unacceptable noise zones. All sites with environmental or community noise exposure exceeding the day-night average sound level (DNL) of 65 dB are considered noise-impacted areas.

Table 7-27 Project Site Acceptability Standards

Noise Zone	Day-Night Average Sound Level (in dB)	Special Approvals and Requirements
Acceptable	Not exceeding 65 dB	None
Normally Unacceptable	Above 65 dB but not exceeding 75 dB	- Environmental assessment and attenuation required for new construction - Attenuation strongly encouraged for major rehabilitation - Note: An EIS is required if the project site is largely undeveloped or will encourage incompatible development.
Unacceptable	Above 75 dB	- EIS required - Attenuation required for new construction with approval by the Assistant Secretary of HUD’s Office of Community Planning & Development or Certifying Officer

Source: 24 CFR Part 51, Subpart B, Noise Abatement and Control

The “Normally Unacceptable” noise zone includes community noise levels from above 65 dB to 75 dB. Approvals in this noise zone require a minimum of 5 dB additional sound attenuation for buildings having noise-sensitive uses if the DNL is greater than 65 dB but does not exceed 70 dB, or a minimum of 10 dB of additional sound attenuation if the DNL is greater than 70 dB but does not exceed 75 dB.

Locations with DNL above 75 dB have “Unacceptable” noise exposure. For new construction, noise attenuation measures in these locations require the approval of the Assistant Secretary for HUD’s Office of Community Planning & Development (for projects reviewed under 24 CFR Part 50) or the Responsible Entity’s Certifying Officer (for projects reviewed under 24 CFR Part 58). The acceptance of such locations normally requires an EIS.

In “Unacceptable” noise zones, HUD strongly encourages conversion of noise-exposed sites to land uses compatible with the high noise levels.

HUD has not established construction noise thresholds or operational noise thresholds. Therefore, construction and operational noise associated with the project alternatives is assessed against the City of Los Angeles thresholds, which are discussed in Section 4.9.3.

As described in detail in Section 4.9, *Noise*, a construction and operational noise assessment was completed for the project (Appendix G). The methodology used to evaluate potential direct and indirect noise effects of the project alternatives is described in Section 4.9.3.

HUD’s interior noise standard is 45 dB. To evaluate compliance with the HUD interior noise level standard building construction, details such as exterior wall and window type and floor coverings are required. These details are available for the 327 Harbor Site, and a detailed analysis of the 327 Harbor Site building construction was conducted to determine the interior noise levels. The noise level reduction provided by a building may be calculated by assuming a generalized sound level spectrum

(arterial traffic in this case), correcting for A-weighting, determining the composite transmission loss and resulting sound level inside an affected room, correcting for room absorption and calculating the overall sound level inside the room.

Worst-case exterior noise exposure along the east side of the 327 Harbor Site building was assumed to be 71 dBA L_{dn} based on traffic noise modeling. It was also assumed for the calculations that windows and doors would remain closed, as central air conditioning and heating would be provided in the proposed building. Since experience has shown that the transmission loss performance reported for laboratory test conditions cannot be expected from normal “as-built” assemblies, a 3-dBA adjustment is applied for the determination of compliance with the applicable HUD noise level standard.

Construction details, based upon floor plans and information provided in the 327 North Harbor Entitlement Submittal, are summarized as follows, including the assumed Sound Transmission Class (STC) of each sound transmitting component, as applicable:

- Exterior Walls: Stucco siding, 2-inch by 4-inch wood studs, 0.5-inch gypsum board on the inside with cavity insulation (STC 46)
- Windows: Low air-infiltration-rate aluminum frame sliders with dual glazing (STC 26)
- Doors: Solid core wood or French doors with perimeter weather-stripping and threshold seals (STC 31)
- Interior Floors: Carpet and pad or a combination of carpet and vinyl or other soft tile
- Interior Walls and Ceiling: Gypsum board walls and ceiling

Vibration

As discussed in Section 4.9, *Noise*, there are no federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from land use development projects such as the proposed project. However, the Federal Transit Administration (FTA) has adopted vibration criteria for use in evaluating vibration impacts from construction activities (FTA 2018). The vibration building damage and human annoyance thresholds adopted by the FTA are listed in Section 4.9.3.

As described in detail in Section 4.9, *Noise*, a vibration assessment was completed for construction of the project. An operational vibration assessment was not completed, as the project alternatives do not include uses that generate substantial vibration. The methodology used to evaluate potential direct and indirect vibration effects of the project alternatives is described in Section 4.9.3.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve ground-disturbing construction activities or change the existing uses of the project site. Because no construction equipment would be used on the project site under the No Project Alternative, no on-site or off-site construction-related noise or vibration would occur. The No Project Alternative would not create new uses on the project site that involve amplified sound or new stationary sources of sound or vibration. No changes to on-site operation noise or traffic noise would occur. Therefore, the No Project Alternative would result in no direct or indirect impacts related to noise and vibration.

Proposed Project Alternative

CONSTRUCTION EFFECTS

Construction activities under the Proposed Project Alternative would produce noise that could affect existing on-site residences at the OSP Specific Plan Site and nearby off-site residential receptors surrounding the project site. As described in Section 4.9.3, construction activities would increase ambient noise levels at sensitive receptors by up to 23 dBA, which would exceed the City's 5-dBA increase threshold of significance. Therefore, construction of the Proposed Project Alternative would result in potentially significant direct noise impacts.

In addition, use of heavy equipment during project construction could result in vibration at nearby buildings. Based on FTA recommendations, limiting vibration levels to below 0.2 in/sec PPV at residential structures would prevent architectural damage regardless of building construction type and limiting vibration levels to below 72 VdB at off-site sensitive receptors would prevent human annoyance. As described in Section 4.9.3, construction would result in vibration levels of up to 0.21 in/sec PPV and 87 VdB, which would exceed the FTA thresholds for architectural damage and human annoyance. Therefore, construction would result in potentially significant direct vibration impacts.

OPERATIONAL EFFECTS

As described in Section 4.9.3, the Proposed Project Alternative would not result in increased traffic that would cause significant off-site traffic noise impacts. However, potential recreational uses proposed on the OSP Specific Plan Site, such as the youth sports field, skate park, dog park, and bandshell, have the potential to disturb the peace, quiet, and comfort of neighbors and exceed the City's 5-dBA ambient noise increase threshold. Therefore, operational noise associated with recreational uses on the OSP Specific Plan Site would be potentially significant.

Based on the calculated future (2037) traffic noise levels, the east façade of the future residential buildings immediately adjacent to Harbor Boulevard would be exposed to traffic noise levels of 71 dBA L_{dn} . Such noise levels would exceed the HUD exterior noise standard of 65 dBA L_{dn} . Therefore, outdoor areas of proposed buildings along Harbor Boulevard would be exposed to substantial noise.

HUD's interior noise level standard is 45 dBA L_{dn} within habitable dwelling units. The worst-case future exterior traffic noise exposure would occur at the exterior of the future multi-family units at the 327 Harbor Site and Construction Stages 7 and 10 of the OSP Specific Plan Site closest to Harbor Boulevard, which would experience noise levels of 71 dB L_{dn} . This means that an outdoor-to-indoor noise level reduction of at least 26 dBA ($71 \text{ dBA } L_{dn} - 45 \text{ dBA } L_{dn} = 26 \text{ dBA } L_{dn}$) at proposed residential portions of buildings along Harbor Boulevard would be required for compliance with HUD's interior noise level standard.

Table 7-28 provides a summary of calculated noise level reduction values based upon the above-described building construction details and transmission loss data obtained from laboratory test reports for individual building component assemblies. Outdoor-to-indoor noise reduction worksheets for the two typical rooms analyzed are included in Appendix E of the OSP Specific Plan Noise and Vibration Study Report (Appendix G). As shown in Table 7-28, the proposed building materials at 327 Harbor Site would achieve the required noise level reduction levels for compliance with HUD's interior noise level standard of 45 dBA L_{dn} .

Table 7-28 Summary of Noise Level Reduction Calculations for 327 Harbor Site

Room	Exterior Noise Level, CNEL	Building Attenuation (Noise Level Reduction)	Resulting Interior Sound Level (L _{dn})
Primary Bedroom (2-Bedroom Corner Unit)	71 dBA	29 dBA	42 dBA
Living Room/Kitchen/Dining (3-Bedroom Typical Unit)	71 dBA	31 dBA	40 dBA

CNEL = community noise equivalent level; dBA = A-weighted decibels; L_{dn} = average A-weighted noise level during a 24-hour day; Noise Level Reduction = difference between outdoor and indoor noise levels
 Note: Noise Level Reduction values include a 3-dB margin for “as-built” assemblies.
 Source: A/E Tech LLC 2023 (Appendix G)

Although noise and land use compatibility impacts to the 327 Harbor Site would not be adverse, there may be noise and land use compatibility impacts on the Proposed Project Alternative at future buildings of the OSP Specific Plan Site that would be located immediately west of Harbor Boulevard since design-level details are not yet available for these buildings. Therefore, the Proposed Project Alternative would result in a potentially significant impact related to noise compatibility.

Operation of the Proposed Project Alternative would not include uses that generate substantial vibration. Therefore, direct and indirect operational vibration impacts would be less than significant.

In summary, operational noise impacts produced by the Proposed Project Alternative would be potentially significant, and the Proposed Project Alternative would also result in potentially significant noise compatibility issues at buildings and outdoor use areas adjacent to Harbor Boulevard. Operational vibration impacts would be less than significant.

MITIGATION MEASURES

Because construction and operation of the Proposed Project Alternative would result in noise levels that may exceed the applicable significance thresholds, the project Applicant would be required to implement Mitigation Measures NOI-1 and NOI-2 from Section 4.9.3:

NOI-1 Construction Noise Reduction Measures:

The following measures shall be implemented at the project site during construction to minimize the community exposure to construction noise:

- All construction equipment shall be outfitted with manufacturer-recommended mufflers and silencers.
- Staging and delivery areas shall be located as far as feasible from existing residences.
- Material hauling and deliveries shall be coordinated by the construction contractor to reduce the potential of trucks waiting to unload for protracted periods of time.
- To the extent feasible, hydraulic equipment shall be used instead of pneumatic impact tools, and electric powered equipment shall be used instead of diesel-powered equipment.
- For smaller equipment (such as air compressors and small pumps), line powered (electric) equipment shall be used to the extent feasible.
- Stationary noise sources (e.g., generators and air compressors) shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary sheds, or insulation barriers.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes. The construction manager shall be responsible for enforcing this.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, they shall investigate, take appropriate corrective action, and report the action to the City. The sign will have a minimum dimension of 48 inches wide by 24 inches high. The sign shall be placed 5 feet above ground level.
- Temporary noise barriers of 12 feet in height shall be erected along the project property boundaries adjacent to sensitive receivers. Barriers shall be constructed with a solid material that has a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. Alternately, if an acoustical blanket, curtain or equivalent absorptive material is used, it shall be rated STC 32 or higher.

NOI-2 Stationary Recreational Noise Reduction Measures:

The following measure shall be included to minimize stationary recreational noise at the OSP Specific Plan Site:

- Prior to holding the first amplified event at any new site with amplified sound (e.g., at the youth sports field and bandshell), HACLA or its designee shall install signs at entry points that state prohibited activities during the event (e.g., use of air horns, unapproved audio amplification systems, loud activity in parking lots or streets upon exiting the facility). In addition, and prior to holding the first amplified event at the facility, the sound system contractor shall create a Public Announcement (PA) System Design Plan to minimize special event noise at nearby residences, to the extent feasible. Design measures may include, but are not limited to, bandwidth and peak limiter installation, and speaker angle and directivity techniques. Prior to the first amplified special event, the sound system contractor shall perform a system check to verify that the PA system meets the PA System Design Plan.
- Once the precise locations and design details of the project's proposed youth sports field and other potential recreational uses, such as a skate park, bandshell, and/or dog park, is finalized, HACLA or its designee shall conduct a quantitative analysis of the operational noise levels from such sources to determine if the project's recreational uses would result in an exceedance of the City of Los Angeles' exterior noise level standards. If these recreational uses will not exceed established thresholds, no additional measures are necessary. However, if it is determined that these recreational uses could potentially result in exceedance of the City's adopted exterior noise standards, the project Applicant shall be required to implement additional feasible measures to minimize noise generated at the recreational uses. Such additional measures to reduce recreational noise impacts may include, but are not limited to, operational hour restrictions, setbacks, barriers, and other shielding techniques. HACLA shall verify these additional measures are included in the final site plan prior to issuing construction permits for the recreational uses.

Additionally, because construction vibration may exceed the applicable thresholds, Mitigation Measure NOI-3 from Section 4.9.3 would be required:

NOI-3 Construction Vibration Reduction Measures:

Prior to the issuance of grading permits, the following measures shall be included as notes on all construction plans:

- If paving activities occur within 25 feet of off-site buildings or structures, a pneumatic or static roller shall be used in lieu of a vibratory roller.
- Grading and earthwork activities within 15 feet of adjacent residential structures shall be conducted with off-road equipment that is limited to 100 hp or less.

Finally, because noise levels at residential outdoor use areas and residential building interiors may exceed the applicable HUD thresholds, Mitigation Measures NOI-4 and NOI-5 would be required:

NOI-4 Exterior Noise Reduction Measures:

To mitigate exterior noise at future outdoor use areas along Harbor Boulevard, the following measures shall be required:

- Construct 5-foot-high barriers (as measured from the finished floor of the residential units) for balconies and patios with direct line-of-sight to Harbor Boulevard. Materials for the barriers may include solid masonry, plexiglass, 1/4-inch-thick glass, stucco veneer over wood framing or foam core, or a combination of these barrier types. The barrier shall be continuous from bottom to top, with no cracks or gaps.
- Construct a 6-foot-high barrier along the eastern portion of the second-story 327 Harbor Boulevard courtyard. Materials may include those listed above.
- Construct a 6-foot-high barrier along the eastern portion of the OSP Specific Plan Site Construction Stage 10 courtyard. Materials may include those listed above.

NOI-5 Interior Noise Reduction Measures:

The Applicant shall retain a qualified acoustical consultant to provide design-level review of site plans and make specific recommendations for ensuring that future traffic noise levels from Harbor Boulevard comply with HUD's interior noise level criteria at the future residential buildings in the Construction Stage 7 and Stage 10 areas of the OSP Specific Plan Site.

SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measure NOI-1 would minimize construction noise levels by outfitting construction equipment with mufflers and silencers, locating staging and delivery areas as far from existing residences as feasible, requiring the use of hydraulic equipment instead of pneumatic impact tools, enclosing stationary noise sources in temporary sheds or within barriers, prohibiting engine idling, notifying nearby business and residents of the planned construction activities, and erecting a temporary barrier along the project property boundaries adjacent to sensitive receptors. Mitigation Measure NOI-1 would reduce construction noise levels by up to 15 dBA at first-story receptors, which would reduce construction noise impacts to less than significant levels at these receptors. However, the barriers would not substantially reduce noise levels for second-story and higher receptors. Therefore, existing and future on-site receptors at the OSP Specific Plan Site and existing off-site receptors near the OSP Specific Plan Site and 327 Harbor Site in buildings with two or more stories would experience potentially significant construction noise impacts, even with implementation of Mitigation Measure NOI-1. Construction noise impacts would remain potentially significant.

Implementation of Mitigation Measure NOI-2 would reduce stationary recreational noise associated with operation of the proposed youth sports field and other potential recreational uses, such as a

skatepark, bandshell, and/or dog park, on the OSP Specific Plan Site by requiring a PA System Design Plan to reduce amplified noise from these recreational uses. Mitigation Measure NOI-2 also requires additional quantitative noise analyses once the final design of the potential recreational uses is complete and the precise locations of recreational features, including the location of speakers for the PA system(s). However, because the final design of the proposed youth sports field and other potential recreational uses are not currently known, it may not be possible to reduce noise from these recreational areas, including during amplified events at the sports field and/or other potential recreational uses. Therefore, stationary recreational noise impacts would remain potentially significant.

With implementation of Mitigation Measure NOI-3, alternative equipment would be used near off-site receptors to reduce construction-related vibration. Specifically, use of a static roller would generate vibration levels of approximately 0.05 in/sec PPV and 82 VdB at a distance of 25 feet (McIver 2012). Grading and earthwork equipment that is limited to 100 hp or less would generate 0.006 in/sec PPV and 65 VdB within 15 feet of sensitive receptors. Therefore, Mitigation Measure NOI-3 would reduce vibration levels to below the threshold of significance for architectural damage. However, if uncontrolled, the use of a static roller within 25 feet of a sensitive receptor could still exceed the human annoyance threshold of 72 VdB. Implementation of Mitigation Measure NOI-1 would designate a complaint coordinator who would investigate complaints and take appropriate corrective action to minimize construction vibration disturbances, in the event nearby receptors experience annoyance related to construction vibration. Nonetheless, vibration levels could still exceed the human annoyance threshold of 72 VdB and impacts related to human annoyance would remain potentially significant.

With implementation of Mitigation Measure NOI-4, noise levels at future outdoor use areas along Harbor Boulevard would be reduced below 65 dBA L_{dn} and impacts would be less than significant. Implementation of Mitigation Measure NOI-5 would ensure interior noise levels at proposed residential buildings on the OSP Specific Plan Site are in compliance with HUD interior noise standards and impacts would be less than significant.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

The Historic Rehabilitation Alternative would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Similar to the Proposed Project Alternative, construction would result in noise that would exceed the City's thresholds at the nearest receptors. Likewise, roadway and utility work could occasionally occur within 25 feet of structures, which could result in peak vibration levels in exceedance of applicable thresholds related to architectural impacts and human annoyance. Therefore, construction of the Historic Rehabilitation Alternative would result in potentially significant direct noise and vibration impacts.

OPERATIONAL EFFECTS

The Historic Rehabilitation Alternative would result in a minor increase in vehicle trips compared to existing uses and would not cause a significant increase in traffic noise in the project area. In addition, the Historic Rehabilitation Alternative would not develop new outdoor recreational uses on the project site, and stationary noise produced would not exceed the City's thresholds. Therefore, operation of the Historic Rehabilitation Alternative would not produce noise in excess of the City's standards, and direct and indirect noise impacts would be less than significant.

Similar to the Proposed Project Alternative, noise levels at outdoor use areas adjacent to Harbor Boulevard would be exposed to traffic noise that exceeds the HUD exterior noise standard. In addition, residential units immediately adjacent to Harbor Boulevard on the OSP Specific Plan Site may experience interior noise levels that exceed the HUD interior noise standard. Therefore, the Historic Rehabilitation Alternative would result in a potentially significant direct impact related to noise compatibility.

MITIGATION MEASURES

Because construction of the Historic Rehabilitation Alternative would result in noise and vibration levels that may exceed the applicable significance thresholds, the project Applicant would be required to implement Mitigation Measures NOI-1 and NOI-3, as presented under the Proposed Project Alternative above. It is noted that Mitigation Measure NOI-2 is not required under the Historic Rehabilitation Alternative because this alternative would not include new recreational areas.

In addition, because noise levels at residential outdoor use areas and residential building interiors may exceed the applicable HUD thresholds, modified versions of Mitigation Measures NOI-4 and NOI-5 would be required. These modified mitigation measures are presented below:

HR NOI-4 Exterior Noise Reduction Measures:

To mitigate exterior noise at future outdoor use areas along Harbor Boulevard, the following measures shall be required:

- Construct 5-foot-high barriers (as measured from the finished floor of the residential units) for balconies and patios with direct line-of-sight to Harbor Boulevard. Materials for the barriers may include solid masonry, plexiglass, 1/4-inch-thick glass, stucco veneer over wood framing or foam core, or a combination of these barrier types. The barrier shall be continuous from bottom to top, with no cracks or gaps.
- Construct a 6-foot-high barrier along the eastern portion of the second-story 327 Harbor Boulevard courtyard. Materials may include those listed above.

HR NOI-5 Interior Noise Reduction Measures:

The Applicant shall retain a qualified acoustical consultant to provide design-level review of site plans and make specific recommendations for ensuring that future traffic noise levels from Harbor Boulevard comply with HUD's interior noise level criteria at residential buildings fronting Harbor Boulevard on the OSP Specific Plan Site.

SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measure NOI-1 would minimize construction noise levels by up to 15 dBA at first-story receptors, which would reduce construction noise impacts to less than significant levels at these receptors. However, the barriers would not substantially reduce noise levels for second-story and higher receptors. Therefore, receptors in buildings with two or more stories would experience significant construction noise impacts, even with implementation of Mitigation Measure NOI-1. Construction noise impacts would remain potentially significant.

Similar to the Proposed Project Alternative, with implementation of Mitigation Measure NOI-3, construction vibration levels under the Historic Rehabilitation Alternative would be reduced to below the threshold of significance for architectural damage. However, if uncontrolled, the use of a static roller within 25 feet of a sensitive receptor could still exceed the human annoyance threshold.

Implementation of Mitigation Measure NOI-1 would designate a complaint coordinator who would investigate complaints and take appropriate corrective action to minimize construction vibration disturbances, in the event nearby receptors experience annoyance related to construction vibration. Nonetheless, vibration levels could still exceed the human annoyance threshold of 72 VdB and construction vibration impacts related to human annoyance would remain potentially significant.

With implementation of Mitigation Measure HR NOI-4, noise levels at future outdoor use areas along Harbor Boulevard would be reduced below 65 dBA L_{dn} and impacts would be less than significant. Implementation of Mitigation Measure HR NOI-5 would ensure interior noise levels at residential buildings on the OSP Specific Plan Site are in compliance with HUD interior noise standards and impacts would be less than significant.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

The Partial Preservation Alternative would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Similar to the Proposed Project Alternative, construction would result in noise that would exceed the City's thresholds at the nearest receptors. Likewise, roadway and utility work could occasionally occur within 25 feet of structures, which could result in peak vibration levels in exceedance of applicable thresholds related to architectural impacts and human annoyance. Therefore, construction of the Partial Preservation Alternative would result in potentially significant direct noise and vibration impacts.

OPERATIONAL EFFECTS

The Partial Preservation Alternative would include a similar mix of uses as the Proposed Project Alternative, with reduced density. Similar to the Proposed Project Alternative, the Partial Preservation Alternative would not result in increased traffic that would cause significant off-site traffic noise impacts. However, potential recreational uses proposed on the OSP Specific Plan Site, such as the youth sports field, skate park, dog park, and bandshell, have the potential to disturb the peace, quiet, and comfort of neighbors and exceed the City's 5-dBA ambient noise increase threshold. Therefore, direct operational noise associated with recreational uses on the OSP Specific Plan Site would be potentially significant.

Similar to the Proposed Project Alternative, noise levels at outdoor use areas adjacent to Harbor Boulevard would be exposed to traffic noise that exceeds the HUD exterior noise standard. In addition, residential units immediately adjacent to Harbor Boulevard on the OSP Specific Plan Site may experience interior noise levels that exceed the HUD interior noise standard. Therefore, the Partial Preservation Alternative would result in a potentially significant direct impact related to noise compatibility.

MITIGATION MEASURES

Because construction and operation of the Partial Preservation Alternative would result in noise levels that may exceed the applicable noise and vibration thresholds, the project Applicant would be required to implement Mitigation Measures NOI-1 through NOI-5, as presented under the Proposed Project Alternative above.

SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measure NOI-1 would minimize construction noise levels by up to 15 dBA at first-story receptors, which would reduce construction noise impacts to less than significant levels at these receptors. However, the barriers would not substantially reduce noise levels for second-story and higher receptors. Therefore, receptors in buildings with two or more stories would experience significant construction noise impacts, even with implementation of Mitigation Measure NOI-1. Construction noise impacts would remain potentially significant.

Implementation of Mitigation Measure NOI-2 would reduce stationary recreational noise associated with operation of the proposed youth sports field and other potential recreational uses, such as a skatepark, bandshell, and/or dog park, on the OSP Specific Plan Site by requiring a PA System Design Plan to reduce amplified noise from these recreational uses. Mitigation Measure NOI-2 also requires additional quantitative noise analyses once the final design of the potential recreational uses is complete and the precise locations of recreational features, including the location of speakers for the PA system(s). However, because the final design of the proposed youth sports field and other potential recreational uses are not currently known, it may not be possible to reduce noise from these recreational areas, including during amplified events at the sports field and/or other potential recreational uses. Therefore, stationary recreational noise impacts would remain potentially significant.

Similar to the Proposed Project Alternative, with implementation of Mitigation Measure NOI-3, construction vibration levels under the Partial Preservation Alternative would be reduced to below the threshold of significance for architectural damage. However, if uncontrolled, the use of a static roller within 25 feet of a sensitive receptor could still exceed the human annoyance threshold. Implementation of Mitigation Measure NOI-1 would designate a complaint coordinator who would investigate complaints and take appropriate corrective action to minimize construction vibration disturbances, in the event nearby receptors experience annoyance related to construction vibration. Nonetheless, vibration levels could still exceed the human annoyance threshold of 72 VdB and construction vibration impacts related to human annoyance would remain potentially significant.

With implementation of Mitigation Measure NOI-4, noise levels at future outdoor use areas along Harbor Boulevard would be reduced below 65 dBA L_{dn} and impacts would be less than significant. Implementation of Mitigation Measure NOI-5 would ensure interior noise levels at new residential buildings adjacent to Harbor Boulevard on the OSP Specific Plan Site are in compliance with HUD interior noise standards and impacts would be less than significant.

Cumulative Effects

As discussed in Section 3.4, *Cumulative Development*, 12 cumulative projects have been identified in the vicinity of the project site. These nearby cumulative projects include residential, retail, and restaurant development. Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, based on City guidance. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. The No Project Alternative would not include construction activities, and therefore would not contribute to cumulative noise impacts. However, as described in Section 4.9.4, potentially significant construction noise impacts could occur if any of the project build alternatives is under construction during the construction periods of Cumulative Project Nos. 4, 5, 6, and/or 7. Construction-related noise levels from the cumulative projects would be intermittent and temporary, and it is anticipated that the cumulative projects would comply with the construction hour regulations

and other applicable provisions set forth in the LAMC. Noise associated with cumulative construction activities would be reduced to the degree reasonable and technically feasible through proposed mitigation measures for each individual cumulative project and compliance with the locally adopted and enforced noise ordinance. However, although the project build alternatives would require implementation of Mitigation Measure NOI-1, which would minimize construction noise impacts, construction noise impacts associated with the project alternatives would remain potentially significant after mitigation. Therefore, this analysis conservatively assumes cumulative noise impacts from on-site construction would be potentially significant and unavoidable.

Construction of cumulative projects also has the potential to produce vibration that could cause architectural damage or human annoyance. The No Project Alternative would not include construction activities, and therefore would not contribute to cumulative vibration impacts. Although there could be other cumulative projects simultaneously under construction near the project site, the potential for building architectural damage impacts from construction vibration is within relatively close distances (e.g., within approximately 25 feet for a vibratory roller and 15 feet for grading and earthwork equipment). The closest cumulative project site to the proposed project site is Cumulative Project No. 5 located at 111 North Harbor Boulevard, which is approximately 50 feet east of the OSP Specific Plan Site. Therefore, based on distance attenuation, potential building architectural damage from the concurrent construction activities on the project site under the remaining project alternatives and cumulative project sites would be less than significant. In terms of potential construction vibration annoyance, it is assumed that earthmoving equipment such as a dozer could be operated from the center of the Cumulative Project No. 5 site, which would be approximately 100 feet from the nearest off-site buildings. At this distance, vibration levels from construction of Cumulative Project No. 5 would be approximately 69 VdB, which would not exceed the threshold of 72 VdB for potential human annoyance. In the unlikely event that utility or road work as part of the project build alternatives occurred simultaneously with construction of Cumulative Project No. 5, vibration levels would still be up to 82 VdB with implementation of Mitigation Measure NOI-3, which would require the use of a static roller. Since construction vibration from Cumulative Project No. 5 would be more than 10 VdB below the vibration level from the project, the increase from the combination of both sources would be negligible and the combined level is predicted to remain at 82 VdB. Therefore, cumulative construction vibration impacts would be less than significant, and the project build alternatives' contribution would not be cumulatively considerable.

Cumulative projects have the potential to result in increased vehicle trips that can contribute to traffic noise impacts, as well as noise associated with new stationary operational noise sources. As shown in Table 4.9-13, vehicle traffic increases in 2037 (the projected operational year for the project build alternatives) would not contribute to noise level increases that exceed impact criteria. Table 4.9-13 includes traffic generated by the cumulative projects. Therefore, cumulative traffic noise impacts would be less than significant.

The No Project Alternative and the Historic Rehabilitation Alternative would not include new sources of substantial stationary operational noise and would result in less than significant cumulative impacts related to operational noise when combined with the cumulative projects.

The Proposed Project Alternative and the Partial Preservation Alternative would introduce new stationary recreational noise sources to the ambient noise environment in the vicinity of the project area. Stationary recreational noise is localized and would only occur at locations that facilitate recreational activities such as the youth sports field and the potential skate park, bandshell, and/or dog park. Implementation of Mitigation Measure NOI-2 under the Proposed Project Alternative and the Partial Preservation Alternative would require a PA Design Plan and additional analysis of noise

generated at the potential skate park, bandshell, and/or dog park when project-level details are available. However, since future project-level details for the potential skate park, dog park, or other recreational noise sources are not available, it may not be possible to mitigate noise from amplified events such as at the sports field and/or bandshell and impacts would remain potentially significant. Therefore, under the Proposed Project Alternative and the Partial Preservation Alternative, cumulative stationary recreational noise impacts would be potentially significant and unavoidable, and the Proposed Project Alternative's and the Partial Preservation Alternative's contribution would be cumulatively considerable.

7.4.11 Public Services

This section analyzes the potential impacts of the project alternatives on public services in the project area, including police departments/services, fire departments/services (including emergency medical services [EMS]), schools, municipal buildings, community facilities, institutional residences, and healthcare facilities. For purposes of this analysis, direct impacts are those that would result in the physical displacement of an existing facility, disruption to a facility's property area or direct ability to provide service(s), and/or alterations in access to a facility. An indirect impact would occur if the project would induce other changes that could affect public services. For example, should the project induce other changes that would increase the demand on public services such that it exceeds capacity, an indirect impact would occur.

Affected Environment

The project area contains existing public services, as briefly described below. For additional information regarding existing police facilities, fire/EMS facilities, schools, and libraries, the reader is referred to Section 4.11, *Public Services*.

Police Protection

As described in Section 4.11.2, *Police Protection*, the Los Angeles Police Department (LAPD) provides police protection to the project site. LAPD facilities include LAPD Harbor Community Police Station located at 2175 John S. Gibson Boulevard, approximately 1.5 miles north of the project site. In addition, the Los Angeles Port Police Headquarters is located approximately 300 feet south of the OSP Specific Plan Site, at 330 Centre Street.

Fire and EMS Service

As described in Section 4.11.1, *Fire Service*, the Los Angeles Fire Department (LAFD) fire protection and EMS to the project site. There are three LAFD fire stations located within a 2-mile radius of the project site. The closest station to the project site is Fire Station No. 112, which is the designated "first in" station for the project site, located approximately 0.5 mile to the southeast of the project site.

Schools

As described in Section 4.11.3, *Schools*, the Los Angeles Unified School District (LAUSD) schools that would serve the project are Barton Hill Elementary School and Maritime Science, Technology, Engineering, Arts, and Mathematics (STEAM) Magnet located approximately 0.6 miles north of the project site, Dana Middle School and STEAM Magnet located approximately 1 mile southwest of the project site, and San Pedro High School located approximately 1.2 miles southwest of the project site (LAUSD 2022c). In addition, the Port of Los Angeles also operates a Charter High School one block south of the OSP Specific Plan Site, called the Port of Los Angeles High School. Mary Star of the Sea

Elementary School and Holy Trinity School and Preschool are private schools within a 1-mile radius of the project site.

Barton Hill Elementary School and Maritime STEAM Magnet has a seating capacity of 600 students and a current enrollment of 420 students, Dana Middle School and STEAM Magnet has a seating capacity of 1,551 students and a current enrollment of 1,460 students, and San Pedro High School has a seating capacity of 2,856 students and a current enrollment of 2,856 students (LAUSD 2022c). LAUSD does not have current plans to expand the existing schools or develop new schools in the project area (LAUSD 2022c).

Municipal Buildings

The San Pedro Neighborhood City Hall is located on Beacon Street approximately 1,200 feet south of the project site. Additionally, the Los Angeles County San Pedro Services Center is located on 3rd Street approximately 2,500 feet west of the project site. No other municipal buildings are located in the vicinity of the project site.

Community Facilities

Community facilities include libraries, community centers, and churches. As described in Section 4.11.4, *Libraries*, the Los Angeles Public Library (LAPL) provides library services in Los Angeles, and the library serving the project site is the San Pedro Regional Library, located 1.1 miles southwest of the project site. Community centers near the project site include the Anderson Memorial Senior Citizen Center located on Mesa Street approximately 0.5 mile south of the project site, the Toberman Neighborhood Center located on Grand Avenue approximately 0.4 mile west of the project site, and the Boys and Girls Club of San Pedro located on Cabrillo Avenue approximately 1.4 miles southwest of the project site. There are a variety of churches in the vicinity of the project site, the closest of which include Mt. Sinai Missionary Baptist Church (230 feet southwest of the project site), the Potter's House Church of San Pedro (500 feet north of the project site), and San Pedro Christian Center (1,000 feet south of the project site).

Institutional Residences

Institutional residences include nursing homes, jails, juvenile detention facilities, and mental hospitals. There are no nursing homes, juvenile detention facilities, or mental hospitals in the vicinity of the project site. The Federal Correctional Institution, Terminal Island is located within the Port of Los Angeles approximately 1.2 miles southeast of the project site. There are no other jails in the vicinity of the project site.

Healthcare Facilities

The closest hospital to the project site is the Providence Little Company of Mary Medical Center, located approximately 1.2 miles southwest of the project site. There are also a variety of healthcare facilities within 2 miles of the project site, such as Quest Diagnostics, San Pedro Urgent Care, San Miguel Urgent Care, Harbor Community Health Centers, and various doctors' offices. Social and mental health services, such as counseling, are also provided in facilities concentrated on 6th Street, located approximately 0.2 mile south of the OSP Specific Plan Site.

Regulatory Setting

The following laws, regulations, and plans related to public services are discussed in Sections 4.11.1.2, 4.11.2.2, 4.11.3.2, and 4.11.4.2:

- Occupational Safety and Health Act
- Federal Emergency Management Act
- Disaster Management Act of 2000
- CBC
- California Fire Code
- California Fire Service and Rescue Emergency Aid System
- California Vehicle Code, Section 21806
- California Constitution Article XIII, Section 35
- California Governor’s Office of Emergency Services
- City of Los Angeles Charter
- City of Los Angeles Administrative and Municipal Codes (including requirements to enforce the City’s Fire, Building, and Health Codes)
- Los Angeles Fire Department Strategic Plan 2018–2020
- LAUSD Strategic Plan 2022-2026
- Los Angeles Public Library Branch Facilities Plan 2007
- Los Angeles Public Library Strategic Plan 2015–2020
- City of Los Angeles General Plan Framework Element
- City of Los Angeles General Plan Safety Element
- San Pedro Community Plan
- LAMC

A discussion of additional regulations related to emergency response emergency response and fire safety operations is provided below:

Safety and Health Regulations for Construction (29 CFR Part 1926)

The Occupational Safety and Health Administration’s (OSHA) construction-related safety and health regulations are contained in 29 CFR Part 1926, Safety and Health Regulations for Construction. 29 CFR Part 1926 provides rules, procedures, processes, and regulations such as safety and health standards, inspections, environmental controls, personal protective and lifesaving equipment, fire protection and safety, signs, signals, barricades, motor vehicles mechanized equipment, electrics, materials storage, tools, and more.

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects to public services are provided in Table 7-29.

Table 7-29 Public Services Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	- Would not disrupt public services, including causing changes to physical infrastructure or access to a public service - Would not relocate existing public services facilities - Would not change the level of service, response times, service demand, or communication abilities between entities
	Indirect Effect	- Would not induce any further changes to increase the demand on public services - Would not increase risk of public service facilities to identifiable hazards - Would not induce increases in student/teacher ratios or change in school district zoning
	Applies to All Effect Types	- Would result in no discernable changes to/decreases in public services in the project area - Would only alter public services for an indiscernible or negligible period of time
Less Than Significant	Direct Effect	- Would result in temporary disruptions to public services, such as a change in infrastructure or access - Would require minor relocations of public services that would not result in substantial service disruption - Would result in a minor, temporary change in the level of service, response times, service demand, or communication abilities
	Indirect Effect	- Would induce increases in the demand on public services but would not exceed available capacity - Would temporarily increase risk of public service facilities to identifiable hazards - Would induce temporary increases in student/teacher ratios
	Applies to All Effect Types	- Public services would only be altered/diminished for a short, finite period, and would not exceed available capacity - Short-term impacts would be localized in specific areas and not substantially affect or diminish public services throughout the project area

Impact Level	Type of Effect	Impact Description
Potentially Significant	Direct Effect	- Would result in substantial or long-term disruptions to public services, such as change in infrastructure or access - Would require relocations of public services that would result in substantial service disruption - Would result in a substantial or long-term change in the level of service, response times, service demand, or communication abilities
	Indirect Effect	- Would induce increase in the demand on public services that would exceed available capacity - Would increase risk of public service facilities to identifiable hazards
	Applies to All Effect Types	- Public services would be adversely altered/diminished for an extended or permanently - Impacts would substantially affect or diminish public services throughout the project area - Changes to public services may or would conflict with existing laws and regulations
Beneficial	Direct Effect	Would result in changes that improve the capacity, delivery, or efficiency of public services in the project area
	Indirect Effect	- Would induce further changes that would decrease the demand on public services - Would decrease risk of public services to identifiable hazards
	Applies to All Effect Types	Would result in public services benefits, improvements, and/or increases in the project area

To conduct this analysis, the locations of existing and planned public services facilities and relationships between project components and these resources were identified. Potential direct impacts to hard infrastructure and corresponding disruptions in service (e.g., through proposed road closures) in specific locations were identified. In addition, a qualitative analysis of anticipated changes to the supply of and demand for public services was conducted. This qualitative analysis considered other potential impacts to the project area from implementation of the project, and compared these potential changes with the existing conditions.

Overall, potential impacts were analyzed in terms of potential relocations or displacements; disruptions to services; short- and long-term changes to supply, demand, and capacity of services; and changes in the security and reliability of services, as affected both directly and indirectly by each considered alternative.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

Under the No Project Alternative, the existing number of residential units on the project site would be maintained, and no changes to the number of residents or students on the project site and existing demand for public services would continue. Additionally, the No Project Alternative would not involve road closures or other activities that could disrupt public services, increase the risk of public service facilities to identifiable hazards, or result in the relocation of public services. Therefore, the No Project Alternative would result in no direct or indirect impact to public services.

Proposed Project Alternative

CONSTRUCTION EFFECTS

Construction activities associated with the Proposed Project Alternative could temporarily increase existing demand on fire protection services due to fire risks associated with construction machinery. However, in compliance with 29 CFR Part 1926, construction managers and personnel would be trained in emergency response and fire safety operations. Training would include monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulation for Construction established by OSHA. In addition, fire suppression equipment (e.g., fire extinguishers) would be maintained throughout the project site during construction. Construction of the Proposed Project Alternative would also occur in compliance with all federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Proposed Project Alternative construction activities to expose people to the risk of fire or explosion related to hazardous materials and nonhazardous combustible materials.

Construction of the Proposed Project Alternative would not generate a population increase that would require additional police services. However, construction sites can invite theft and vandalism and thereby become sources of nuisance and hazard. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As described in Section 4.11.2.3, the project Applicant would implement temporary security measures, including security, fencing, lighting, and locked entry to the project site during construction, consistent with PDF POL-1, Construction Security. The project Applicant would also provide regular security patrols during non-construction hours. With implementation of these security measures, the potential demand on police protection services would be reduced at the project site relative to theft and vandalism during construction.

In addition, during construction of the Proposed Project Alternative, occasional lane closures would be required for utilities and roadway improvements. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials, and construction worker traffic. Lane closures and increased traffic due to construction activities could temporarily affect travel times of emergency services vehicles and access to nearby public service facilities. However, travel would be maintained on all streets around the project site throughout the construction period and emergency access would be maintained throughout construction. In addition, a Construction Management Plan developed in coordination with LADOT would be implemented during project construction pursuant to PDF T-1 to ensure that adequate and safe access remains available within and near the project site and that construction impacts to nearby public service facilities, including school, healthcare, municipal, community, and institutional facilities, are minimized. The project would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the project site and traffic flow is maintained on adjacent rights-of-way. Therefore, construction of the Proposed Project Alternative would result in less than significant direct and indirect impacts to public services.

OPERATIONAL EFFECTS

As described in Section 4.11, *Public Services*, the Proposed Project Alternative would result in a net increase of approximately 2,715 residents, 314 employees, and 453 students compared to existing uses, which would incrementally increase the demand for public services in the project vicinity. As discussed in detail in Section 4.11.1.3, the Proposed Project Alternative would increase the service population of the LAFD by less than one percent overall, and LAFD has determined fire protection for the project site would be adequate. In addition, the Proposed Project Alternative would implement all applicable City Building and Fire Code regulations regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features. The Proposed Project Alternative would undergo LAFD review to ensure compliance with City regulations. This review process would ensure the Proposed Project Alternative would minimize the demand for fire protection and EMS. Therefore, the Proposed Project Alternative would result in less than significant direct and indirect impacts related to fire protection and EMS.

As described in Section 4.11.2.3, the population increase that would occur under the Proposed Project Alternative would change the police officer ratio from 1.54 to 1.52 officers for every 1,000 residents, less than a 2-percent increase. The Proposed Project Alternative would incorporate crime prevention measures as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety, installation of closed-circuit television at select locations including (but not limited to) entry and exit points, lobby areas, outdoor open spaces, and parking areas, and provision of on-site security personnel, in accordance with PDF POL-2, Safety Lighting, and PDF POL-3, Operational Security. Other crime prevention features would include nighttime security lighting, secured parking structures, controlled building access, and pedestrian security gates. These preventative and proactive security measures, as well as the Proposed Project Alternative's contribution to the City's General Fund (in the form of property taxes, sales revenue, etc.), would help offset the project-related increase in demand for police services. Therefore, the Proposed Project Alternative would result in less than significant direct and indirect operational impacts to police services.

As detailed in Section 4.11.3.3, the Proposed Project Alternative would generate approximately 249 new elementary school students, 68 middle school students, and 136 high school students. Based on current enrollment and capacity data, Dana Middle School and STEAM Magnet would have sufficient capacity to serve the Proposed Project Alternative but there would be a potential shortage of 69 seats at Barton Hill Elementary School and STEAM Magnet and 136 seats at San Pedro High School. However, the number of students generated by the Proposed Project Alternative who would attend LAUSD schools serving the project site would likely be less than the estimate presented above because this analysis does not include LAUSD options that would allow students generated by the Proposed Project Alternative to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in homeschooling. This analysis is also conservative in that it assumes that none of the future project residents would already have students attending schools in the district boundaries. In addition, the project Applicant would pay development fees to LAUSD to fund public education services. Therefore, the Proposed Project Alternative would result in less than significant direct and indirect impacts to school services.

The Proposed Project Alternative would develop up to 85,000 sf of Neighborhood Serving Uses on the OSP Specific Plan Site, which include services and facilities such as community centers, a health clinic, wellness center, workforce development center, youth center, and municipal and nonprofit office space, among other uses. Pursuant to PDF LIB-1, Universal Wi-Fi, the Proposed Project Alternative would also include free, publicly accessible Wi-Fi in residential common areas and public open space

areas. The inclusion of these amenities and services on the project site would reduce demand on the existing library, community, and healthcare facilities in the project vicinity and provide new services to the larger San Pedro community. The Proposed Project Alternative would also generate revenues for the City's General Fund that could be applied towards community and municipal facilities serving the project area. Operation of the Proposed Project Alternative would not include any activities that would increase risk of public service facilities to identifiable hazards or substantially affect or diminish public services throughout the project area, including police, fire/EMS, school, municipal, community, institutional residence, and healthcare facilities and services. Therefore, the Proposed Project Alternative would result in less than significant direct and indirect impacts to public services.

In summary, operation of the Proposed Project Alternative would result in less than significant direct and impacts to public services.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

Construction of the Historic Rehabilitation Alternative would comply with 29 CFR Part 1926 and OSHA requirements, as well as all federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Compliance with regulatory requirements would reduce the demand for fire protection services during construction and effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and nonhazardous combustible materials. Additionally, the Historic Rehabilitation Alternative would implement PDF POL-1, Construction Security, to ensure site safety on the project site and reduce potential demand for police protection services. PDF T-1 would also be implemented to ensure adequate and safe access to the project site and surroundings during construction and minimize the potential for disruptions to nearby public services including schools, municipal buildings, community facilities, institutional residences, and healthcare facilities. Therefore, construction of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts to public services.

OPERATIONAL EFFECTS

The Historic Rehabilitation Alternative would result in a net increase of 114 residents and 17 students. New residents and students generated by the Historic Rehabilitation Alternative would represent a negligible increase in the service population for public service providers serving the project site. The Historic Rehabilitation Alternative would implement all applicable City Building and Fire Code regulations regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, and life safety features. The Historic Rehabilitation Alternative would undergo LAFD review to ensure compliance with applicable City regulations. This review process would ensure that demand for fire protection and EMS is further reduced. The Historic Rehabilitation Alternative would also generate revenues for the City's General Fund and LAUSD that could be applied towards maintaining and expanding public services and facilities in the project vicinity. Operation of the Historic Rehabilitation Alternative would not include any activities that would increase risk of public service facilities to identifiable hazards or substantially affect or diminish public services throughout the project area, including police, fire/EMS, school, municipal, community, institutional residence, and healthcare facilities and services. Therefore, operation of the Historic Rehabilitation Alternative would result in less than significant direct and impacts to public services.

*Partial Preservation Alternative***CONSTRUCTION EFFECTS**

Construction of the Partial Preservation Alternative would comply with 29 CFR 1926 and OSHA requirements, as well as all federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Compliance with regulatory requirements would reduce the demand for fire protection services during construction and effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and nonhazardous combustible materials. Additionally, the Partial Preservation Alternative would implement PDF POL-1, Construction Security, to ensure site safety on the project site and reduce potential demand for police protection services. PDF T-1 would also be implemented to ensure adequate and safe access to the project site and surroundings during construction and minimize the potential for disruptions to nearby public services including schools, municipal buildings, community facilities, institutional residences, and healthcare facilities. Therefore, construction of the Partial Preservation Alternative would result in less than significant direct and indirect impacts to public services.

OPERATIONAL EFFECTS

The Partial Preservation Alternative would result in a net increase of approximately 1,878 residents, 267 employees, and 325 students compared to existing uses, which would incrementally increase the demand for public services in the project vicinity. The Partial Preservation Alternative would increase the service population of the LAFD by less than 1 percent overall, and LAFD has determined fire protection for the project site would be adequate. In addition, the Partial Preservation Alternative would implement all applicable City Building and Fire Code regulations regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, and life safety features. The Partial Preservation Alternative would undergo LAFD review to ensure compliance with City regulations. This review process would ensure the Partial Preservation Alternative would minimize the demand for fire protection and EMS. Therefore, the Partial Preservation Alternative would result in less than significant direct and indirect impacts related to fire protection and EMS.

The population increase that would occur under the Partial Preservation Alternative would change the officer ratio from 1.54 to 1.53 officers for every 1,000 residents, less than a 2-percent increase. The Partial Preservation Alternative would incorporate similar crime prevention measures as the Proposed Project Alternative, including secured buildings, safety lighting, and on-site security personnel, in accordance with PDF POL-2, Safety Lighting, and PDF POL-3, Operational Security. These preventative and proactive security measures, as well as the Partial Preservation Alternative's contribution to the City's General Fund, would help offset the increase in demand for police services. Therefore, the Partial Preservation Alternative would result in less than significant direct and indirect impacts related to police services.

As detailed in Section 6.6.2, the Partial Preservation Alternative would generate a net increase of approximately 178 elementary school students, 49 new middle school students, and 98 new high school students. Based on current enrollment and capacity data, Barton Hill Elementary School and STEAM Magnet and Dana Middle School and STEAM Magnet would have sufficient capacity to serve the Partial Preservation Alternative but there would be a potential shortage of 98 seats at San Pedro High School. However, the number of students by the Partial Preservation Alternative who would attend LAUSD schools serving the project site would likely be less than the estimate presented above

because this analysis does not include LAUSD options that would allow students generated by the project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in homeschooling. This analysis is also conservative in that it assumes that none of the future project residents would already have students attending schools in the district boundaries. In addition, the project Applicant would pay development fees to LAUSD to fund public education services. Therefore, the Partial Preservation Alternative would result in less than significant direct and indirect impacts to school services.

The Partial Preservation Alternative would develop up to 61,500 sf of Neighborhood Serving Uses on the OSP Specific Plan Site, which include services and facilities such as community centers, a health clinic, wellness center, workforce development center, youth center, and municipal and nonprofit office space, among other uses. Pursuant to PDF LIB-1, Universal Wi-Fi, the Partial Preservation Alternative would also include free, publicly accessible Wi-Fi in residential common areas and public open space areas. The inclusion of these amenities and services on the project site would reduce demand on the existing library, community, and healthcare facilities in the project vicinity and provide new services to the larger San Pedro community. The Partial Preservation Alternative would also generate revenues for the City's General Fund that could be applied towards community and municipal facilities serving the project area. Operation of the Partial Preservation Alternative would not include any activities that would increase risk of public service facilities to identifiable hazards or substantially affect or diminish public services throughout the project area, including police, fire/EMS, school, municipal, community, institutional residence, and healthcare facilities and services. Therefore, the Partial Preservation Alternative would result in less than significant direct and indirect impacts to public services.

In summary, operation of the Partial Preservation Alternative would result in less than significant direct and impacts to public services.

Cumulative Effects

Cumulative development near the project site includes specific known development projects and general ambient growth. A total of 12 cumulative projects have been identified in the vicinity of the project site, as listed in Section 3.4, *Cumulative Development*. As detailed in Section 4.10, *Population and Housing*, the 12 cumulative projects would add approximately 1,508 residential units, resulting in approximately 3,649 new residents. In addition, as discussed in Section 4.11.3.4, cumulative projects would result in a net increase of approximately 1,023 students in the project area. The increase in development and service populations from the project alternatives and cumulative development in the San Pedro CPA would result in a cumulative increase in the demand for public services in the project area.

The No Project Alternative would not include new development or increase the number of dwelling units or residents on the project site, and therefore, would result in less than significant cumulative impacts related to public services when combined with cumulative development.

In general, impacts to public services during the construction of each cumulative project would be addressed as part of each cumulative project's development review process conducted by the City. If construction of any of the project build alternatives occurs concurrently with the construction of cumulative projects in proximity to the project site, specific coordination among these multiple construction sites would be required and implemented through the project build alternatives' construction management plan (as required by PDF T-1), to be developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way and that construction would not disrupt nearby public service facilities. In addition, each cumulative

project would implement similar design features during construction, such as construction management plans, and would be subject to the City's routine construction permitting process, including LAFD review. Therefore, cumulative impacts to public services during construction would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

As described in Section 4.11.1.4, similar to the project build alternatives, the cumulative projects and other reasonably foreseeable future development in the San Pedro CPA would be required to comply with regulatory requirements related to fire protection and would be reviewed by LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts related to fire protection and EMS. Furthermore, the cumulative projects and other future reasonably foreseeable development in the San Pedro CPA would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by the City. As such, cumulative impacts related to fire/EMS services during construction would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

Increased development within the Harbor Community Division would result in incrementally increased demand for LAPD services and jail facilities. In accordance with the police protection-related goals, objectives, and policies set forth in the City's Framework Element, as discussed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the city and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new stations that may become necessary to achieve the desired level of service. The project build alternatives, as well as the cumulative projects and other reasonably foreseeable future development in the San Pedro CPA, would generate revenues to the City's General Fund that could be applied toward the provision of new facilities and related staffing, as deemed appropriate by the City. As discussed above, the project build alternatives are not anticipated to substantially affect existing emergency response in the project area. Therefore, cumulative impacts related to police protection and institutional residences would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

As described in Section 4.11.3.4, cumulative projects and other reasonably foreseeable future development in the San Pedro CPA could require new or expanded school facilities due to the existing low capacities of schools in the project area. However, LAUSD continually monitors enrollment numbers at all schools within the District, and seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Because the location(s) and operational characteristics of any new or expanded school facilities have not yet been identified by LAUSD to specifically serve the project build alternatives and cumulative development, it would be speculative to determine how school capacity shortages would be addressed, including where and what type of expanded or new facilities may be provided. Therefore, at such time as the need for expanded or new school facilities are identified by LAUSD, the environmental impacts associated with construction of those facilities would be evaluated by LAUSD under CEQA and/or NEPA as a separate project, independent of the project build alternatives. As previously discussed, LAUSD has determined that no new schools are planned in the project site's attendance boundaries. Similar to the project build alternatives, cumulative development would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. As discussed above, LAUSD collects development fees for new construction within its district boundaries. Therefore, cumulative impacts to schools would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

Increased population associated with cumulative projects would also increase demand for other public services, including municipal buildings, libraries and other community facilities, and healthcare facilities. As detailed in Section 4.11.4.4, the San Pedro Regional Branch Library would have sufficient capacity to serve the community with the anticipated cumulative development. As detailed above, there are a variety of existing community centers serving various age groups in the project vicinity. There are also a number of medical facilities within 2 miles of the project site, including hospitals, doctor's offices, urgent care centers, and health clinics. As described above, the Historic Rehabilitation Alternative would generate a minor increase in new residents, and would not substantially increase demand for these public services. The Proposed Project Alternative and Partial Preservation Alternative would provide new public services on the project site, such as community centers, a youth center, and a health care clinic, thereby increasing the availability of such services in the project area and offsetting additional demand generated by these two project build alternatives. Based on the above, the project build alternatives combined with cumulative development would result in less than significant cumulative impacts to municipal buildings, libraries and other community facilities, and healthcare facilities, and the project alternatives' contributions would not be cumulatively considerable.

7.4.12 Recreation

This section analyzes the potential impacts of the project alternatives on recreational resources in the project area. These resources include parks, open space, and other recreational facilities. A direct impact would occur if a project alternative would remove a recreational resource or would result in any acquisition of parkland or loss of parking spaces around a facility. Any conversion of an existing park to non-recreation uses would also be classified as a direct impact. An indirect impact would occur if a project alternative would induce other changes, such as changes in visitation timings or patterns or increased noise levels surrounding a particular recreational facility, which would affect the recreational resource.

7.4.12.1 Affected Environment

As described in Section 4.12, *Recreation*, the project site is located within the San Pedro CPA, which contains approximately 473 acres of parks and open space (City of Los Angeles 2017). Regional parks make up approximately 361 acres (76 percent) of the total parkland in the San Pedro CPA. Regional parks serving the CPA include Field of Dreams, Angels Gate Park, Peck Park Community Center, White Point Park, Cabrillo Beach, and Cabrillo Marine Aquarium. The remaining parks in the CPA include 79.9 acres of community parks, 30.9 acres of neighborhood parks, and 0.9 acre of mini parks. According to the 2020 U.S. Census, there were 78,678 residents in the San Pedro CPA (City of Los Angeles 2021b), which equates to approximately 6.01 acres of parkland per 1,000 residents in the CPA, including 4.59 acres of regional parks, 1.02 acres of community parks, 0.39 acre of neighborhood parks, and 0.01 acre of mini parks per 1,000 residents in the CPA.

For additional information regarding existing parks, open space, and recreational opportunities in the San Pedro CPA, the reader is referred to Section 4.12.1.

Regulatory Setting

The following laws, regulations, and plans related to public services are discussed in Section 4.12.2:

- Quimby Act
- City of Los Angeles Charter

- City of Los Angeles General Plan
- City of Los Angeles Public Recreation Plan (part of the Service Systems Element of the City General Plan)
- San Pedro Community Plan
- LAMC
- City of Los Angeles 2009 Citywide Community Needs Assessment
- City of Los Angeles 50 Parks Initiative
- City of Los Angeles Park Proud LA Strategic Plan 2018-2022

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects to recreation are provided in Table 7-30.

Table 7-30 Recreation Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	▪ Would not result in loss, disruption, or decrease in the accessibility of a recreational resource ▪ Would not result in a change in the factors contributing to the value of a recreational resource
	Indirect Effect	▪ Would not induce any further changes to recreational resources, such as a decrease in enjoyment, access, value, use, or accessibility
	Applies to All Effect Types	▪ No discernable changes to/decreases in recreational resources in the project area ▪ Would only alter recreational resources for an indiscernible or negligible period of time
Less Than Significant	Direct Effect	▪ Would result in only a temporary loss, disruption, or decrease in accessibility of a recreational resource ▪ Would result in only a temporary change/decrease in the factors contributing to the value of a recreational resource
	Indirect Effect	▪ Would induce only temporary, infrequent, and finite-period changes/decreases to recreational resources, such as a minimal decrease in enjoyment, access, value, use, or accessibility ▪ Would minimally reduce visitation to a recreational area or the duration of recreational activity
	Applies to All Effect Types	▪ Recreational resources would only be altered/diminished for a short, finite period ▪ Short-term impacts would be localized in specific areas and not substantially affect or diminish recreational resources throughout the project area ▪ No net loss of recreational resources in the project area over the long-term

Impact Level	Type of Effect	Impact Description
Potentially Significant	Direct Effect	- Would result in a permanent loss, disruption, or decrease in accessibility of a recreational resource - Would result in a permanent decrease in the factors contributing to the value of a recreational resource
	Indirect Effect	- Would induce permanent, frequent, or long-period changes/decreases to recreational resources, such as a substantial decrease in enjoyment, access, value, use, or accessibility - Would substantially reduce visitation to a recreational area or the duration of recreational activity
	Applies to All Effect Types	- Recreation resources would be altered/diminished for an extended or permanent period - Impacts would substantially affect or diminish recreation resources throughout the project area - Net loss of recreation resources in the project area over the long-term
Beneficial	Direct Effect	- Would result in a gain, beautification, or increase in accessibility/utility of a recreational resource - Would result in a positive change in the factors contributing to the value of a recreational resource - Would create new recreational areas and/or facilities
	Indirect Effect	- Would induce positive changes to recreational resources, such as an increase of enjoyment, access, value, use, or accessibility - Would induce creation of additional recreational areas and/or facilities
	Applies to All Effect Types	Would result in recreational benefits, improvements, and/or increases in the project area

The project alternatives were evaluated to determine the potential for changes to recreational resources within the project area. Potential impacts to parks and recreational resources was assessed based on the following:

- A review of existing recreational resources in the San Pedro CPA;
- Consideration of new parks and open space that would be provided by the proposed project;
- Projection of future population growth associated with implementation of the project; and
- Determination of demand for park and recreational services anticipated with implementation of the proposed project, based on the service ratios established in the City's Public Recreation Plan.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve changes to population or operational activities which could degrade, disrupt, or decrease access to existing parks, open space, or recreational amenities in the project area. Therefore, the No Project Alternative would result in no direct or indirect impacts related to recreational facilities.

Proposed Project Alternative

CONSTRUCTION EFFECTS

Construction of the Proposed Project Alternative would result in a temporary increase in construction workers in the project area. However, given the temporary nature of construction activities and employment patterns of construction workers in the region where construction workers are engaged in a variety of projects of varying lengths and locations, construction of the proposed project would not be anticipated to introduce a permanent new population to the project area that could result in an increase in the use of existing parks and recreational facilities. Additionally, construction activities would not occur on or nearby existing parks, open space, and recreational facilities, and would not disrupt or impede access to these facilities. Thus, construction of the proposed project would not result in the increased use of existing recreational facilities such that substantial physical deterioration would occur or otherwise disrupt or impede recreational facilities. Construction of the Proposed Project Alternative would result in less than significant direct and indirect impacts to recreational facilities.

OPERATIONAL EFFECTS

The Proposed Project Alternative would increase the number of people on the project site by 2,715 residents and 314 employees compared to existing uses, which could increase demand for existing recreational resources in the project area. However, as described in Section 4.12.3, the Proposed Project Alternative would provide 230,000 square feet (5.3 acres) of public open space, 143,050 sf (3.3 acres) of common open space, and 77,650 sf of private open space (50 sf per residential unit), for a combined open space of 450,700 sf (10.3 acres) on the OSP Specific Plan Site, which would exceed the requirements in the LAMC. Likewise, on the 327 Harbor Site, 7,006 sf of open space would be provided, exceeding the LAMC requirements. As described in Section 2, *Project Description*, the Proposed Project Alternative would include a variety of open space areas and amenities, as well as recreational programming, that would provide recreational opportunities for future project residents, employees, and visitors. New recreational amenities that would be provided by the Proposed Project Alternative include a linear park along Palos Verdes Street, a community center, a youth sports field, a pedestrian promenade along Second Street from Palos Verdes Street to Harbor Boulevard, and several courtyards and plazas interspersed throughout the Proposed Project Alternative buildings. An outdoor fitness center and enhanced walking/jogging paths and bikeways would also be provided. It is anticipated the project's future residents would generally utilize on-site open space to meet their recreational needs. While the project's residents would also be expected to utilize off-site public parks to some degree, the Proposed Project Alternative would not be expected to result in the deterioration of off-site public parks or recreational facilities, given the provision of on-site open space and recreational amenities. In addition, operation of the Proposed Project Alternative would not involve any activities that would disrupt or impede access to these recreational facilities. Therefore, operation of the Proposed Project Alternative would result in less than significant direct and indirect impacts to recreational facilities.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

Construction of the Historic Rehabilitation Alternative would result in a temporary increase in construction workers in the project area. However, given the temporary nature of construction activities and employment patterns of construction workers in the region where construction workers

are engaged in a variety of projects of varying lengths and locations, construction of the Historic Rehabilitation Alternative would not be anticipated to introduce a permanent new population to the project area that could result in an increase in the use of existing parks and recreational facilities. Additionally, construction activities would not occur on or nearby existing parks, open space, and recreational facilities, and would not disrupt or impede access to these facilities. Thus, construction of the Historic Rehabilitation Alternative would not result in the increased use of existing recreational facilities such that substantial physical deterioration would occur or otherwise disrupt or impede recreational facilities. Construction of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts related to recreational facilities.

OPERATIONAL EFFECTS

The Historic Rehabilitation Alternative would not increase the number of people on the OSP Specific Plan Site but would increase the residential population of the 327 Harbor Site by approximately 114 new residents. The increase of residents at the 327 Harbor Site could increase demand for existing recreational resources in the project area. The Historic Rehabilitation Alternative would include 7,006 sf of open space on the 327 Harbor Site, which exceeds the open space requirements of LAMC Section 12.21 G. As described in Section 2, *Project Description*, the Historic Rehabilitation Alternative would provide open space at the 327 Harbor Site through a publicly accessible entry plaza and staircase entry along Harbor Boulevard leading into an interior courtyard. In addition, the Historic Rehabilitation Alternative would include a community room, garden walk, and fitness center on the 327 Harbor Site, and it is anticipated future residents on the 327 Harbor Site would generally utilize on-site open space to meet their recreational needs. While the Historic Rehabilitation Alternative's future residents would also be expected to utilize off-site public parks, the Historic Rehabilitation Alternative would not be expected to result in the deterioration of off-site public parks or recreational facilities, given the provision of on-site open space and recreational amenities. In addition, operation of the Historic Rehabilitation Alternative would not involve activities that would remove existing parks or recreational areas or disrupt or impede access to these recreational facilities. Therefore, operation of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts to recreational facilities.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

Construction of the Partial Preservation Alternative would result in a temporary increase in construction workers in the project area. However, given the temporary nature of construction activities and employment patterns of construction workers in the region where construction workers are engaged in a variety of projects of varying lengths and locations, construction of the Partial Preservation Alternative would not be anticipated to introduce a permanent new population to the project area that could result in an increase in the use of existing parks and recreational facilities. Additionally, construction activities would not occur on or nearby existing parks, open space, and recreational facilities, and would not disrupt or impede access to these facilities. Thus, construction of the Partial Preservation Alternative would not result in the increased use of existing recreational facilities such that substantial physical deterioration would occur or otherwise disrupt or impede recreational facilities. Construction of the Partial Preservation Alternative would result in less than significant direct and indirect impacts related to recreational facilities.

OPERATIONAL EFFECTS

The Partial Preservation Alternative would increase the number of people on the project site by approximately 2,347 new residents, which could increase the demand on existing recreational resources in the project area. The Partial Preservation Alternative would provide 60,350 sf (1.4 acres) of private open space, 138,980 sf (3.2 acres) of common open space, and 80,000 sf (1.8 acres) of public open space, for a combined total of 279,330 sf of open space on the OSP Specific Plan Site, which would exceed the requirements in the LAMC. On the 327 Harbor Site, 7,006 sf of open space would be provided, exceeding LAMC Section 12.21 G requirements. The Partial Preservation Alternative would include a variety of open space areas and amenities that would provide recreational opportunities for future residents, employees, and visitors. Recreational amenities that would be provided by the Partial Preservation Alternative include Harbor Plaza, refurbishment of the existing sports field at 2nd Street and Centre Street, community room, garden walk, fitness center, and several courtyards and plazas interspersed throughout the proposed buildings. It is anticipated the project's future residents would generally utilize on-site open space to meet their recreational needs. While the Partial Preservation Alternative's future residents would also be expected to utilize off-site public parks, the Partial Preservation Alternative would not be expected to result in the deterioration of off-site public parks or recreational facilities, given the provision of on-site open space and recreational amenities. In addition, operation of the Partial Preservation Alternative would not involve activities that would remove existing parks or recreational areas or disrupt or impede access to these recreational facilities. Therefore, operation of the Partial Preservation Alternative would result in less than significant direct and indirect impacts to recreational facilities.

Cumulative Effects

Cumulative development near the project site includes specific known development projects and general ambient growth. A total of 12 cumulative projects have been identified in the vicinity of the project site, as listed in Section 3.4, *Cumulative Development*. As detailed in Section 4.10, *Population and Housing*, the 12 cumulative projects would add approximately 1,508 residential units, resulting in approximately 3,649 new residents. Development of the cumulative projects would increase population and would create additional need for recreational opportunities within the San Pedro community. However, much of this growth has been anticipated by the City and is factored in the San Pedro Community Plan's Land Use and Urban Design Implementation program. Program No. P29 of the San Pedro Community Plan's Land Use and Urban Design Implementation states, "when feasible, public open space and/or community facilities should be required as condition of approval of proposed projects requiring discretionary action," in relation to amenities and public spaces.

The No Project Alternative would not include new development or increase the number of dwelling units or residents on the project site, and therefore, would result in less than significant cumulative impacts related to recreation when combined with cumulative development.

Similar to the project build alternatives, cumulative development would be required to provide public open space and community facilities pursuant to the City of Los Angeles' Public Recreation Plan and the San Pedro Community Plan's Land Use and Urban Design Implementation Program. In addition, cumulative projects would be required to comply with LAMC Sections 12.21 G and 12.33 G, as well as all other city requirements related to parks and recreational facilities, to provide a certain amount of usable open space and/or pay the required parkland fees, which would help offset the demand for parks and recreational facilities generated by cumulative development. Based on compliance with applicable regulatory requirements, the project build alternatives combined with cumulative

development would result in less than significant cumulative impacts to recreational facilities, and the project alternatives' contributions would not be cumulatively considerable.

7.4.13 Transportation and Circulation

This section analyzes the potential impacts of the project alternatives on transportation and circulation in and around the project area, including conditions related to vehicular traffic, parking, pedestrian and bicycle facilities, freight facilities, ancillary transportation facilities, safety, and transportation accessibility. A direct impact related to transportation would occur, for example, if a project alternative would directly result in construction or operational related decreases in an intersection's level of service (LOS). An indirect impact would occur if a project alternative would temporarily close a road (e.g., from a flood gate) and thereby reroute traffic that would result in transportation delays or an increase in demand for transit, freight operations, or on-street parking in other areas.

7.4.13.1 Affected Environment

As described in Section 4.13, *Transportation*, regional access to the project site is provided by Interstate 110 (I-110) and SR 47 with interchanges located approximately 0.8-mile northwest of the project site and 0.5-mile north of the project site, respectively. I-110 runs in a north-south direction and is located north of the project site, and the project site is accessed via local roadways. The Baseline Year (2021) peak hour traffic volumes at eight study area intersections were analyzed to determine the estimated LOS (see Table 7-31). As shown in Table 7-31, two of the analyzed intersections currently operate at an LOS of E and/or F during peak hours: Gaffey Street and 1st Street (LOS F during AM peak hour and LOS E during PM peak hour) and Harbor Boulevard and 3rd Street (LOS F during AM and PM peak hours).

Table 7-31 Baseline Year (2021) Intersection LOS

Intersection	Peak Hour	Baseline Year (2021)	
		Delay (seconds per vehicle)	LOS
Gaffey Street and I-110/SR 47 Ramps	AM	20.4	C
	PM	22.7	C
Gaffey Street and 1st Street	AM	113.7	F
	PM	59.3	E
Pacific Avenue and 1st Street	AM	33.1	C
	PM	15.6	B
Front Street and SR 47 Westbound Ramps/ Knoll Drive ¹	AM	11.0	C
	PM	5.9	B
Harbor Boulevard and SR 47 Eastbound Ramps/Westbound Off-Ramp/Swinford Street	AM	28.3	C
	PM	22.9	C
Harbor Boulevard and O'Farrell Street	AM	8.2	A
	PM	5.5	A
Harbor Boulevard and 1st Street	AM	36.9	D
	PM	22.5	C

Intersection	Baseline Year (2021)		
	Peak Hour	Delay (seconds per vehicle)	LOS
Harbor Boulevard and 3rd Street ²	AM	65.2	F
	PM	56.0	F

¹ Front Street and SR 47 westbound ramps/Knoll Drive is an unsignalized intersection only in the Baseline Year (2021) conditions.

² Harbor Boulevard and 3rd Street is an unsignalized intersection in all existing and future base scenarios.

Source: Fehr & Peers 2023b

The project is served by several local and regional bus lines. The Metro Local (Route 205) operates on the intersection of 1st Street and Harbor Boulevard, running through and adjacent to the project site. The Metro Bus Rapid Transit (BRT; 910/950) runs through the project site on 1st Street and adjacent to the project site on Beacon Street. LADOT DASH San Pedro line also traverses the project site on 1st Street and Centre Street. The Metro Express (Route 550) and Metro Local (Route 246) bus lines also operate within 0.5-mile of the project site on Gaffey Street and Pacific Avenue. The LADOT Commuter Express 142 and Palos Verdes Peninsula Transit Authority Line 225-226 operate on 7th Street approximately 0.25-mile south of the OSP Specific Plan Site.

Class II²² bicycle lanes are provided in both directions along Harbor Boulevard, Pacific Avenue, and Grand Avenue. The northbound bicycle lane on Harbor Boulevard is buffered. Sidewalks are present along both sides of all streets within and adjacent to the OSP Specific Plan Site and 327 Harbor Site. LADOT has identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions. The HIN puts an emphasis on pedestrians and cyclists. No portions of streets immediately adjacent to the project site are within the HIN. Points of Pacific Avenue, Grand Avenue, and Gaffey Street are included in the HIN (Appendix TRAF).

For additional information regarding the existing transportation network at the project site, the reader is referred to Section 4.13.1.

Regulatory Setting

The following laws, regulations, and plans related to transportation and circulation are discussed in Section 4.13.2:

- Federal Americans with Disabilities Act of 1990 (ADA)
- California Complete Streets Act
- SCAG 2020-2045 RTP/SCS
- City of Los Angeles Mobility Plan 2035
- San Pedro Community Plan
- LAMC
- LADOT Transportation Assessment Guidelines

The Transportation Research Board's Highway Capacity Manual, 6th Edition establishes the methodology to use when conducting traffic analyses (Transportation Research Board 2016). The project-specific LOS Results Summary for NEPA memorandum (Fehr & Peers 2023) is compatible with the 2010 Highway Capacity Manual and is included in Appendix I.

²² Class II bicycle lanes are a portion of the road which is designated by pavement striping for exclusive bicycle use.

Thresholds of Significance and Methodology

In accordance with LADOT’s August 2022 Transportation Assessment Guidelines, a project would be considered to contribute to unacceptable or extended queuing in the turn pocket capacity if any of the following conditions are met:

1. Additional queue along through lanes and either of the following conditions are expected:
 - a. The projected peak hour intersection LOS is D and the through lane queue increases by more than 75 feet on any approach with the directional approach LOS at E or F; or
 - b. The projected peak hour intersection LOS is E or F and the through lane queue increases by more than 50 feet on any approach with the directional approach LOS at E or F;
2. The queue spills over from turn pockets into through lanes;
3. Cross streets or alleys are blocked by the queue;
4. Drive-through queues spill over into streets; and
5. The queue contributes to gridlock congestion.

The significance criteria used to evaluate potential direct and indirect effects to transportation and circulation are provided in Table 7-32 and is based, in part, on LADOT’s Transportation Assessment Guidelines.

Table 7-32 Transportation and Circulation Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	▪ Would not result in a change to an existing transportation or circulation condition
	Indirect Effect	▪ Would not induce other changes that could increase traffic congestion, decrease safety, decrease on-street parking supply, alter pedestrian and bicycle facilities, change demand for transit services and facilities, or change the movement patterns of freight goods
	Applies to All Effect Types	▪ Would not result in discernable changes to the transportation and circulation conditions in the region or locality ▪ Would only alter transportation-related conditions for an indiscernible or negligible period of time
Less Than Significant	Direct Effect	▪ Would result in additional intersection queue along through lanes but the additional queue would be 50 feet or less ▪ Would result in additional intersection queue along through lanes but neither of the following conditions would occur: ▪ The projected peak hour intersection LOS would be D and the through lane queue would increase by more than 75 feet on any approach with the directional approach LOS at E or F; or ▪ The projected peak hour intersection LOS would E or F and the through lane queue would increase by more than 50 feet on any approach with the directional approach LOS at E or F. ▪ Would not result in intersection turn pocket queues spilling over into through lanes ▪ Would not result in cross streets or alleys being blocked by intersection queue ▪ Would result in a drive-through but the queue would not spill over into public roadways

Impact Level	Type of Effect	Impact Description
		- Would not result in intersection queuing that contributes to gridlock congestion - Would not result in a substantial decrease of on-street parking availability - Would result in only short-term disruptions to transit services or the movement of freight goods
	Indirect Effect	- Would induce minimal, short-term change to an existing transportation or circulation condition in the region - Would induce other changes that could result in a minimal, short-term increase in traffic congestion, decrease in safety, decrease in on-street parking supply, alter pedestrian and bicycle facilities, change demand for transit services and facilities, or change the movement patterns of freight goods
	Applies to All Effect Types	- Transportation or circulation conditions would only be altered for a short, finite period and would not result in substantial delays - Impacts would be short-term and localized in specific areas
Potentially Significant	Direct Effect	- Would result in additional intersection queue along through lanes and at least one of the following conditions: - The projected peak hour intersection LOS would be D and the through lane queue would increase by more than 75 feet on any approach with the directional approach LOS at E or F; or - The projected peak hour intersection LOS would E or F and the through lane queue would increase by more than 50 feet on any approach with the directional approach LOS at E or F. - Would result in intersection turn pocket queues spilling over into through lanes - Would result in cross streets or alleys blocked by the intersection queue - Would result in a drive-through, the queue of which spills over into public roadways - Would result in intersection queuing that contributes to gridlock congestion - Would substantially decrease on-street parking availability - Would result in short-term disruptions or changes to transit services or the movement of freight goods
	Indirect Effect	- Would induce a substantial, short- or long-term change to a transportation or circulation condition in the region - Would induce other changes that could result in a short- or long-term substantial increase in traffic congestion, decrease in safety, decrease in on-street parking supply, adversely alter pedestrian and bicycle facilities, change demand for transit services and facilities, or adversely affect the movement patterns of freight goods
	Applies to All Effect Types	- Would result in a substantial, short- or long-term impact on a transportation or circulation condition - Impact would be long-term and adverse, and/or could substantially affect regional conditions
Beneficial	Direct Effect	- Would decrease traffic delay and queuing - Would increase on-street parking supply - Would potentially improve transit services or the movement of freight goods
	Indirect Effect	Would induce other changes that could result in a decrease in traffic congestion, increase in safety, increase in on-street parking supply, beneficial

Impact Level	Type of Effect	Impact Description
		change in pedestrian and biking facilities, beneficial change in demand for transit services and facilities, or beneficial change in freight goods movement patterns
	Applies to All Effect Types	Would result in transportation or circulation benefits observed throughout affected communities

The project alternatives were evaluated to determine the potential for impacts to the existing transportation and circulation conditions in the study area. The objective of this analysis was to determine the potential impacts associated with the proposed construction and operational activities of each considered alternative on the existing transportation infrastructure. The potential impacts may include effects to traffic operations, safety, parking, pedestrian and bicycle facilities, transit facilities and services, and freight goods movement. Based on the components and activities associated with each considered alternative, this analysis determines potential short- and long-term, direct and indirect effects to this infrastructure.

Level of Service Methodology

This analysis uses the Highway Capacity Manual, 6th Edition (Transportation Research Board 2016) methodology to evaluate the operation of project driveways and nearby intersections. This was performed using the Synchro 11 software program. Synchro calculates vehicle delay and LOS based on procedures outlined in the Highway Capacity Manual. This methodology was used to determine the intersection delay in seconds and corresponding LOS at the signalized and unsignalized intersections. The calculation of delay represents the amount of delay experienced by vehicles passing through the intersection. The unsignalized intersection was analyzed using the two-way stop method from the Highway Capacity Manual. Delay was calculated based on the worst-case approach (for the two-way stop-controlled intersection), and used to assign the corresponding LOS, as presented in Table 7-33.

Table 7-33 LOS Thresholds for Signalized and Unsignalized Intersections

Level of Service (LOS)	Signalized Intersection Average Control Delay (seconds per vehicle)	Unsignalized Intersection Average Control Delay (seconds per vehicle)
A	≤ 10.0	≤ 10.0
B	10.1 to 20.0	10.1 to 15.0
C	20.1 to 35.0	15.1 to 25.0
D	35.1 to 55.0	25.1 to 35.0
E	55.1 to 80.0	35.1 to 50.0
F	> 80.0	> 50.0

≤ = less than or equal to; > = greater than

Source: Transportation Research Board 2016

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not result in construction or changes to existing on-site uses or population, and therefore would not affect the existing traffic circulation system in the project area. The No Project Alternative would not cause a direct or indirect adverse effect related to transportation and circulation.

Proposed Project Alternative

CONSTRUCTION EFFECTS

As described in Section 4.13.3, Proposed Project Alternative construction activities, such as temporary lane closures, and construction-related traffic could potentially affect traffic congestion and emergency access in the project area. However, as discussed in Section 7.4.12, *Public Services*, and Section 7.4.8, *Hazards and Hazardous Materials*, travel would be maintained on all streets around the project site, including designated evacuation route streets, and emergency access would be available throughout construction. In addition, a Construction Management Plan developed in coordination with LADOT and emergency service providers would be implemented during project construction pursuant to PDF T-1 to ensure that adequate and safe access remains available within and near the project site during construction activities. Therefore, the Proposed Project Alternative would result in a less than significant direct and indirect construction impacts related to transportation and circulation.

OPERATIONAL EFFECTS

As described in Section 2, *Project Description*, the Proposed Project Alternative would include the minor realignment of LADOT DASH San Pedro and Metro bus routes 205, 910, and 246, and the improved bus stops/shelters to create a unifying character and clearly articulated wayfinding for each of the transit services. The Proposed Project Alternative includes construction of a transit hub that would provide a waiting area for transferring among various bus routes with shade, landscaping, seating, and public art. The Proposed Project Alternative would include enhanced walking trails along 1st Street and 2nd Street to the existing Harbor Boulevard promenade, with another walking trail along the proposed Palos Verdes Linear Park. In addition, a Safe Routes to School Network would be developed along the primary pedestrian streets. The primary Safe Route to School would be located along Mesa Street, 2nd Street, and Beacon Promenade, connecting Barton Hill Elementary School to the Boys and Girls Club, as well as to the proposed Youth Sports Fields, Community Center, and Palos Verdes Linear Park. The Proposed Project Alternative would also include new bicycle lanes along Centre Street, Mesa Street, Palos Verdes Street, 2nd Street, and Santa Cruz Street, as well as a bicycle path through the proposed Palos Verdes Linear Park, to provide improved bicycle access to the OSP Specific Plan Site. Additionally, the Proposed Project Alternative would include a bike hub with secure bicycle parking, showers/lockers, and a retail, rental, and repair shop. Bicycle parking and bike-share stations would be readily available throughout the OSP Specific Plan Site, with focused bicycle nodes formed at the intersection of major bicycle facilities along 2nd Street at Harbor Boulevard and Mesa Street. Street parking, subterranean, and electric vehicle charging spaces would be provided throughout the project site in compliance with LAMC standards. These features would be designed in compliance with the ADA. As described in Section 4.13, *Transportation*, of the EIR/EIS, these

transportation improvements would be consistent with the Mobility Plan 2035; San Pedro Community Plan; Vision Zero; LADOT Manual of Policies and Procedures; the Citywide Design Guidelines; a Plan for a Healthy Los Angeles; and the SCAG 2020-2045 RTP/SCS. Therefore, the Proposed Project Alternative would result in less than significant direct and indirect impacts related to pedestrian and bicycle facilities, and transit services and facilities.

The Proposed Project Alternative would include additional vehicle parking spaces on site, which would help alleviate the demand for on-street parking. Therefore, the Proposed Project Alternative would result in an indirect beneficial impact to on-street parking supply.

Intersection LOS Analysis

Three Future Year Plus Proposed Project Alternative operational scenarios (years 2030, 2035, and 2037) were modeled to determine the Proposed Project Alternative's potential effects on the LOS of the eight analyzed study area intersections, including for Scenario A and Scenario B. Under the Future Year (2030) No Project scenario, the Future Year (2035) No Project scenario, and the Future Year (2037) No Project scenario, five of the eight study intersections are projected to operate at LOS D or better during the peak hours, with the following three intersections operating at LOS E and/or F:

- Gaffey Street and 1st Street (LOS F during the AM peak hour and LOS E during the PM peak hour)
- Front Street and SR 47 westbound ramps/Knoll Drive (LOS E during the AM peak hour)
- Harbor Boulevard and 3rd Street (LOS F during the AM and PM peak hours)

Scenario A

Year 2030. The peak hour LOS of the intersections of Gaffey Street and 1st Street, Front Street and SR 47 westbound ramps/Knoll Drive, and Harbor Boulevard and 3rd Street would continue to operate at LOS E and/or F with the addition of the Proposed Project Alternative under Scenario A in 2030. As shown in Table 11 of the Transportation Assessment (Fehr & Peers 2023a; Appendix I of the EIR/EIS), pursuant to LADOT's criteria, Scenario A of the Proposed Project Alternative is projected to substantially contribute to unacceptable queueing during one or both peak hours at the following study intersections in 2030:

- Gaffey Street and 1st Street (AM peak hour, westbound right-turn pocket)
- Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street (AM peak hour, northbound left-turn pocket)
- Harbor Boulevard and 1st Street (AM and PM peak hours, eastbound left-turn pocket)

This unacceptable queueing would be due to a spillover from a turn pocket into a through lane that would already occur in the future base conditions; however, the Proposed Project Alternative traffic increases the length of the queue spillover by one or more car lengths (Fehr & Peers 2023a). Therefore, because the intersection queues would spillover from turn pockets into through lanes, in 2030, Scenario A of the Proposed Project Alternative would result in a potentially significant direct impact to three analyzed intersections.

Year 2035. The following intersections are projected to operate at LOS E and/or F during the AM or PM peak hours under Future Year (2035) Plus Scenario A of the Proposed Project Alternative conditions:

- Gaffey Street and 1st Street (LOS F during the AM peak hour and LOS E during the PM peak hour)

- Front Street and SR 47 westbound ramps/Knoll Drive (LOS E during the AM peak hour)
- Harbor Boulevard and 3rd Street (LOS E during the AM peak hours)

As shown in Table 12 of the Transportation Assessment (Fehr & Peers 2023a; Appendix I of the EIR/EIS), pursuant to LADOT's criteria, Scenario A of the Proposed Project Alternative is projected to substantially contribute to unacceptable queueing during one or both peak hours at the following study intersections in 2035:

- Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street (AM peak hour, northbound left-turn pocket)
- Harbor Boulevard and 1st Street (AM peak hour, eastbound left-turn pocket)

This unacceptable queueing would be due to a spillover from a turn pocket into a through lane that would already occur in the future base conditions; however, the Proposed Project Alternative traffic increases the length of the queue spillover by one or more car lengths (Fehr & Peers 2023a). Therefore, because the intersection queues would spillover from turn pockets into through lanes, in 2035, Scenario A of the Proposed Project Alternative would result in a potentially significant direct impact to two analyzed intersections.

Year 2037. The following intersections are projected to operate at LOS E and/or F during the AM or PM peak hours under Future Year (2037) Plus Scenario A of the Proposed Project Alternative conditions:

- Gaffey Street and 1st Street (LOS F during the AM peak hour and LOS E during the PM peak hour)
- Pacific Avenue and 1st Street (LOS E during the AM peak hour)
- Front Street and SR 47 westbound ramps/Knoll Drive (LOS E during the AM peak hour)
- Harbor Boulevard and 3rd Street (LOS F during the AM peak hours)

As shown in Table 15 of the Transportation Assessment (Fehr & Peers 2023a; Appendix I of the EIR/EIS), pursuant to LADOT's criteria, Scenario A of the Proposed Project Alternative is projected to substantially contribute to unacceptable queueing during one or both peak hours at the following study intersections in 2037:

- Gaffey Street and 1st Street (AM peak hour, westbound right-turn pocket)
- Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street (AM peak hour, northbound left-turn pocket)
- Harbor Boulevard and 1st Street (AM and PM peak hours, eastbound left-turn pocket)

This unacceptable queueing would be due to a spillover from a turn pocket into a through lane that would already occur in the future base conditions; however, the Proposed Project Alternative traffic increases the length of the queue spillover by one or more car lengths (Fehr & Peers 2023a). Therefore, because the intersection queues would spillover from turn pockets into through lanes, in 2037, Scenario A of the Proposed Project Alternative would result in a potentially significant direct impact to three analyzed intersections.

Scenario B

Year 2030. The peak hour LOS of the intersections of Gaffey Street and 1st Street, Front Street and SR 47 westbound ramps/Knoll Drive, and Harbor Boulevard and 3rd Street would continue to operate at LOS E and/or F with the addition of the Proposed Project Alternative under Scenario B in 2030. As

shown in Table 13 of the Transportation Assessment (Fehr & Peers 2023a; Appendix I of the EIR/EIS), pursuant to LADOT's criteria, Scenario B of the Proposed Project Alternative is projected to substantially contribute to unacceptable queueing during one or both peak hours at the following study intersections in 2030:

- Gaffey Street and 1st Street (AM peak hour, westbound right-turn pocket)
- Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street (AM peak hour, northbound left-turn pocket)
- Harbor Boulevard and 1st Street (AM and PM peak hours, eastbound left-turn pocket)

This unacceptable queueing would be due to a spillover from a turn pocket into a through lane that would already occur in the future base conditions; however, the Proposed Project Alternative traffic increases the length of the queue spillover by one or more car lengths (Fehr & Peers 2023a). Therefore, because the intersection queues would spillover from turn pockets into through lanes, in 2030, Scenario B of the Proposed Project Alternative would result in a potentially significant direct impact to three analyzed intersections.

Year 2035. The following intersections are projected to operate at LOS E and/or F during the AM or PM peak hours under Future Year (2035) Plus Scenario B of the Proposed Project Alternative conditions:

- Gaffey Street and 1st Street (LOS F during the AM peak hour and LOS E during the PM peak hour)
- Front Street and SR 47 westbound ramps/Knoll Drive (LOS E during the AM peak hour)
- Harbor Boulevard and 3rd Street (LOS E during the AM peak hours)

As shown in Table 14 of the Transportation Assessment (Fehr & Peers 2023a; Appendix I of the EIR/EIS), pursuant to LADOT's criteria, Scenario B of the Proposed Project Alternative is projected to substantially contribute to unacceptable queueing during one or both peak hours at the following study intersections in 2035:

- Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street (AM peak hour, northbound left-turn pocket)
- Harbor Boulevard and 1st Street (AM and PM peak hours, eastbound left-turn pocket)

This unacceptable queueing would be due to a spillover from a turn pocket into a through lane that would already occur in the future base conditions; however, the Proposed Project Alternative traffic increases the length of the queue spillover by one or more car lengths (Fehr & Peers 2023a). Therefore, because the intersection queues would spillover from turn pockets into through lanes, in 2035, Scenario B of the Proposed Project Alternative would result in a potentially significant direct impact to two analyzed intersections.

Year 2037. Similar to Scenario A in 2037, the following intersections are projected to operate at LOS E and/or F during the AM or PM peak hours under Future Year (2037) Plus Scenario B of the Proposed Project Alternative conditions:

- Gaffey Street and 1st Street (LOS F during the AM peak hour and LOS E during the PM peak hour)
- Pacific Avenue and 1st Street (LOS E during the AM peak hour)
- Front Street and SR 47 westbound ramps/Knoll Drive (LOS E during the AM peak hour)
- Harbor Boulevard and 3rd Street (LOS F during the AM peak hours)

As shown in Table 15 of the Transportation Assessment (Fehr & Peers 2023a; Appendix I of the EIR/EIS), pursuant to LADOT's criteria, Scenario B of the Proposed Project Alternative is projected to substantially contribute to unacceptable queueing during one or both peak hours at the following study intersections in 2037:

- Gaffey Street and 1st Street (AM peak hour, westbound right-turn pocket)
- Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street (AM peak hour, northbound left-turn pocket)
- Harbor Boulevard and 1st Street (AM and PM peak hours, eastbound left-turn pocket)

This unacceptable queueing would be due to a spillover from a turn pocket into a through lane that would already occur in the future base conditions; however, the Proposed Project Alternative traffic increases the length of the queue spillover by one or more car lengths (Fehr & Peers 2023a). Therefore, because the intersection queues would spillover from turn pockets into through lanes, in 2037, Scenario B of the Proposed Project Alternative would result in a potentially significant direct impact to three analyzed intersections.

MITIGATION

Because operational impacts to three study area intersections under the Proposed Project Alternative would be potentially significant due to unacceptable queueing, the project Applicant would be required to implement Mitigation Measure T-1:

T-1 Intersection Restriping:

The following measures shall be implemented, upon approval by LADOT, to increase the space available for vehicle queueing at affected intersections:

- At the intersection of Gaffey Street and 1st Street, up to 75 feet of additional red curb shall be striped to increase the turning space length available for the de-facto westbound right-turn lane.
- At the intersection of Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street, the northbound left-turn lane shall be extended by approximately 100 feet into the existing median to accommodate a longer turning queue.
- At the intersection of Harbor Boulevard and 1st Street, the eastbound left-turn lane shall be extended to start two blocks further to the west, which shall be accomplished within the existing right-of-way with striping.

SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measure T-1, the available queuing spaces at the intersections of Gaffey Street and 1st Street, Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street, and Harbor Boulevard and 1st Street would be increased so the queueing would occur within turn pockets and not spillover into through lanes. Therefore, with mitigation, potential impacts to these three intersections under the Proposed Project Alternative would be reduced to less than significant levels.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

Historic Rehabilitation Alternative construction activities, such as temporary lane closures, and construction-related traffic could potentially affect traffic congestion and emergency access in the project area. However, as discussed in Section 7.4.12, *Public Services*, and Section 7.4.8, *Hazards and Hazardous Materials*, travel would be maintained on all streets around the project site, including designated evacuation route streets, and emergency access would be available throughout construction. In addition, a Construction Management Plan developed in coordination with LADOT and emergency service providers would be implemented during project construction pursuant to PDF T-1 to ensure that adequate and safe access remains available within and near the project site during construction activities. Therefore, the Historic Rehabilitation Alternative would result in a less than significant direct and indirect construction impacts related to transportation and circulation.

OPERATIONAL EFFECTS

The Historic Rehabilitation Alternative would provide electric vehicle charging stations and bicycle parking to promote active transportation; however, the Historic Rehabilitation Alternative would not include transportation improvements within and surrounding the OSP Specific Plan Site. Transit locations and schedules, existing bicycle lanes, and sidewalks would remain the same under the Historic Rehabilitation Alternative as existing conditions. The Historic Rehabilitation Alternative would not generate substantial population such that existing transportation facilities would become inadequate. Therefore, the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts related to pedestrian and bicycle facilities, and transit services and facilities.

The Historic Rehabilitation Alternative would not include additional vehicle parking spaces on site and would not decrease the on-street parking supply. Therefore, the Historic Rehabilitation Alternative would result in no indirect impact related to on-street parking supply.

Intersection LOS Analysis

The Future Year (2025) Plus Historic Rehabilitation Alternative operational scenario was modeled to determine the Historic Rehabilitation Alternative's potential buildout effects on the LOS of the eight analyzed study area intersections. Under the Future Year (2025) No Project scenario, five of the eight study intersections are projected to operate at LOS D or better during the peak hours, with the following three intersections operating at LOS E and/or F:

- Gaffey Street and 1st Street (LOS F during the AM peak hour and LOS E during the PM peak hour)
- Front Street and SR 47 westbound ramps/Knoll Drive (LOS E during the AM peak hour)
- Harbor Boulevard and 3rd Street (LOS F during the AM and PM peak hours)

The peak hour LOS of the intersections of Gaffey Street and 1st Street, Front Street and SR 47 westbound ramps/Knoll Drive, and Harbor Boulevard and 3rd Street would continue to operate at LOS E and/or F with the addition of the Historic Rehabilitation Alternative in 2025. However, as shown in Table 7 of the LOS Results Summary for NEPA memorandum (Fehr & Peers 2023b; Appendix I of the EIR/EIS), pursuant to LADOT's criteria, buildout of the Historic Rehabilitation Alternative is not projected to substantially contribute to unacceptable queueing during one or both peak hours at the study intersections. Therefore, because the intersection queues would not be unacceptable pursuant

to LADOT's criteria, the Historic Rehabilitation Alternative would result in less than significant direct impacts to three analyzed intersections.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

Partial Preservation Alternative construction activities, such as temporary lane closures, and construction-related traffic could potentially affect traffic congestion and emergency access in the project area. However, as discussed in Section 7.4.12, *Public Services*, and Section 7.4.8, *Hazards and Hazardous Materials*, travel would be maintained on all streets around the project site, including designated evacuation route streets, and emergency access would be available throughout construction. In addition, a Construction Management Plan developed in coordination with LADOT and emergency service providers would be implemented during project construction pursuant to PDF T-1 to ensure that adequate and safe access remains available within and near the project site during construction activities. Therefore, the Partial Preservation Alternative would result in a less than significant direct and indirect construction impacts related to transportation and circulation.

OPERATIONAL EFFECTS

The Partial Preservation Alternative would include similar transportation improvements as the Proposed Project Alternative, with the exception of the enhanced walking trails proposed along 1st Street and 2nd Street, and the Palos Verdes Linear Park. The Partial Preservation Alternative would include improvements to the existing pedestrian bicycle and transit system, which would ensure adequate access to multiple forms of transportation is provided for existing and new residents generated by the Partial Preservation Alternative. These transportation improvements would be designed in compliance with the ADA and would be consistent with the Mobility Plan 2035; San Pedro Community Plan; Vision Zero; LADOT Manual of Policies and Procedures; the Citywide Design Guidelines; a Plan for a Healthy Los Angeles; and the SCAG 2020-2045 RTP/SCS. Therefore, the Partial Preservation Alternative would result in less than significant direct and indirect impacts related to pedestrian and bicycle facilities, and transit services and facilities.

The Partial Preservation Alternative would include additional vehicle parking spaces on site, which would help alleviate the demand for on-street parking. Therefore, the Partial Preservation Alternative would result in an indirect beneficial impact to on-street parking supply.

Intersection LOS Analysis

The Future Year (2037) Plus Partial Preservation Alternative operational scenario was modeled to determine the Partial Preservation Alternative's potential buildout effects on the LOS of the eight analyzed study area intersections. Under the Future Year (2037) No Project scenario, five of the eight study intersections are projected to operate at LOS D or better during the peak hours, with the following three intersections operating at LOS E and/or F:

- Gaffey Street and 1st Street (LOS F during the AM peak hour and LOS E during the PM peak hour)
- Front Street and SR 47 westbound ramps/Knoll Drive (LOS E during the AM peak hour)
- Harbor Boulevard and 3rd Street (LOS F during the AM and PM peak hours)

As shown in Table 8 of the LOS Results Summary for NEPA memorandum (Fehr & Peers 2023b; Appendix I of the EIR/EIS), pursuant to LADOT's criteria, the Partial Preservation Alternative is

projected to substantially contribute to unacceptable queueing during one or both peak hours at the following study intersections in 2037:

- Gaffey Street and 1st Street (AM peak hour, westbound right-turn pocket)
- Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street (AM peak hour, northbound left-turn pocket)
- Harbor Boulevard and 1st Street (AM and PM peak hours, eastbound left-turn pocket)

This unacceptable queueing would be due to a spillover from a turn pocket into a through lane that would already occur in the future base conditions; however, the Partial Preservation Alternative traffic increases the length of the queue spillover by one or more car lengths (Fehr & Peers 2023b). Therefore, because the intersection queues would spillover from turn pockets into through lanes, in 2037, the Partial Preservation Alternative would result in a potentially significant direct impact to three analyzed intersections.

MITIGATION

Because operational impacts to three study area intersections under the Partial Preservation Alternative would be potentially significant due to unacceptable queueing, the project Applicant would be required to implement Mitigation Measure T-1, as presented under the Proposed Project Alternative above.

SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measure T-1, the available queuing spaces at the intersections of Gaffey Street and 1st Street, Harbor Boulevard and SR 47 eastbound ramps/westbound off-ramp/Swinford Street, and Harbor Boulevard and 1st Street would be increased so the queueing would occur within turn pockets and not spillover into through lanes. Therefore, with mitigation, potential impacts to these three intersections under the Partial Preservation Alternative would be reduced to less than significant levels.

Cumulative Effects

As shown in Table 3-1 in Section 3.4, *Cumulative Development*, there are 12 cumulative projects in the vicinity of the project site. The cumulative projects include residential, retail, and restaurant development.

The cumulative projects would contribute to changes in the volume and distribution of vehicular traffic in the project area, including in the short-term (during construction of the cumulative projects) and in the long-term. The increase in traffic congestion due to construction activities associated with the cumulative projects would be offset with the implementation of individual construction management plans by each project to ensure emergency access would not be substantially affected. The cumulative projects would also likely include some improvements to transportation facilities in the San Pedro community, similar to the project build alternatives. Furthermore, the cumulative projects would be required to provide on-site parking spaces in compliance with the City's requirements, and therefore, on-street parking supply would not be negatively effected by the cumulative projects. Accordingly, cumulative projects would result in less than significant cumulative impacts related to pedestrian and bicycle facilities, transit services and facilities, and on-street parking supply.

The Future Year No Project scenarios discussed above, which include an ambient growth factor of 0.3 percent per year, show that five of the eight study intersections are projected to operate at LOS D or better during the peak hours, with the following three intersections operating at LOS E and/or F:

- Gaffey Street and 1st Street (LOS F during the AM peak hour and LOS E during the PM peak hour)
- Front Street and SR 47 westbound ramps/Knoll Drive (LOS E during the AM peak hour)
- Harbor Boulevard and 3rd Street (LOS F during the AM and PM peak hours)

It is likely that the cumulative projects would contribute to unacceptable queueing at these intersections during the peak hours, and therefore, cumulative impacts to these three analyzed intersections would be potentially significant. Although the No Project Alternative's and the Historic Rehabilitation Alternative's contribution to potentially significant cumulative impacts to intersections would not be cumulatively considerable, the Proposed Project Alternative's and the Partial Preservation Alternative's contribution would be cumulatively considerable. However, the Proposed Project Alternative and the Partial Preservation Alternative would implement Mitigation Measure T-1, which would reduce those project build alternative's contribution to potentially significant cumulative impacts to intersections. Because intersection impacts are applicable only pursuant to NEPA compliance and not considered a significant impact under CEQA, the cumulative projects would not be required to reduce intersection impacts unless a specific project is specific to the requirements of NEPA. Therefore, because the individual cumulative projects would not be required to reduce NEPA-specific cumulative impacts to intersections, the cumulative impact to intersections would remain potentially significant and unavoidable.

7.4.14 Water Resources and Water Quality

This section analyzes the potential impacts of the project alternatives on water resources and water quality in the project area. A direct impact would occur if a project alternative would directly alter a water resource on the project site, such as placing fill in a waterbody. An indirect impact would occur if a project alternative would alter an off-site water resource, such as reducing water quality downstream of the project site through increased turbidity, sedimentation, and/or pollutant loads.

Affected Environment

As described in Section 4.7, *Hydrology and Water Quality*, under existing conditions, 57 percent of the OSP Specific Plan Site consists of impervious surfaces (e.g., buildings, parking lots, and paved areas) and 43 percent of the site consists of pervious areas (e.g., courtyards, the sports field, and other landscaped areas). Generally, the OSP Specific Plan Site and surrounding streets slope from west to east. Based on aerial contour maps available through the City of Los Angeles' Navigate LA GIS database, it is estimated the site slopes range from approximately 2 to 7 percent, sloping down in a west-to-east direction (City of Los Angeles 2021b). There currently are no structural stormwater BMPs in place on the OSP Specific Plan Site but non-structural BMPs and environmental water quality measures are currently utilized to minimize pollutants. These water quality measures include general housekeeping practices such as weekly trash collection and spill prevention and response activities where applicable, as well as proper storage of hazardous materials and wastes. Groundwater infiltration on the OSP Specific Plan Site is limited to areas such as courtyards and the sports field. The total existing flow rate from the OSP Specific Plan Site during a 50-year storm event is approximately 58.51 cubic feet per second (cfs). Groundwater has been encountered 20 to 30 feet below ground surface (bgs) at the OSP Specific Plan Site. Groundwater levels are subject to change due to tidal fluctuations, as the waterfront is approximately 700 feet from the OSP Specific Plan Site at its closest

point. Soils in portions of the OSP Specific Plan Site include contaminants from historical industrial uses; however, contamination is anticipated to be limited to soils.

Under existing conditions, approximately 94 percent of the 327 Harbor Site consists of pervious surface. Generally, the 327 Harbor Site and surrounding streets slope from west to east, with a site slope of 4.2 percent. Rainfall generally leaves the 327 Harbor Site as sheet flow towards Harbor Boulevard, rather than infiltrating into the soil, due to the existing steep slopes and underlying soil conditions, yielding a large flowrate from the site and minimal groundwater infiltration. The 327 Harbor Site does not currently contain stormwater BMPs or treatment features. Due to the relatively small size of the site and its undeveloped nature, the 327 Harbor Site does not substantially contribute to groundwater recharge or groundwater pollution. The total existing flow rate from the 327 Harbor Site during a 50-year storm event is approximately 1.47 cfs. Groundwater was recorded at approximately 20 feet bgs in April 2017 and groundwater was encountered between 22 and 24 feet bgs in April 2021. Soils on the 327 Harbor Site contain contaminants from historical industrial uses; however, groundwater sampling completed on the 327 Harbor Site indicated groundwater underlying the site is not impacted. Existing groundwater infiltration is assumed to be minimal due to underlying soils with low hydraulic conductivity and the existing slope on the 327 Harbor Site.

Neither the OSP Specific Plan Site nor the 327 Harbor Site contain surface waterbodies.

For additional details regarding water resources and water quality at the project site, the reader is referred to Section 4.7.1.

Regulatory Setting

The following laws, regulations, and plans applicable to water resources and water quality are discussed in Section 4.7.2:

- Federal Clean Water Act
- Federal Antidegradation Policy
- Federal Safe Drinking Water Act
- National Flood Insurance Program
- California Toxics Rule
- California Porter-Cologne Water Quality Control Act
- California Safe Drinking Water Act
- California Sustainable Groundwater Management Act
- County of Los Angeles Hydrology Manual
- Los Angeles Regional Water Quality Control Board Basin Plan
- National Pollutant Discharge Elimination System (NPDES) Permit Program

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to water resources and water quality are provided in Table 7-34.

Table 7-34 Water Resources and Water Quality Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	- Would not result in placement of fill, structures, or other discharge in a waterbody - Would not dredge or excavate in a waterbody - Would not mobilize contaminants or sediment into a waterbody within the immediate vicinity of project components - Would not change the quality or quantity of surface water or groundwater - Would not divert surface water or disrupt groundwater flow - Would not result in temporary or long-term disturbance of surface water
	Indirect Effect	- Would not mobilize contaminants into a waterbody - Would not disrupt hydrology to a waterbody - Would not induce activities that could diminish the quality or quantity of surface water or groundwater - Would not increase tributary or river flows that would result in sediment scour - Would not increase stormwater runoff volume
	Applies to All Effect Types	- Would result in no discernable changes to water resources in the project site - Would only alter water resources for an indiscernible or negligible period of time
Less Than Significant	Direct Effect	- Would result in temporary ground disturbance, placement of fill, structures, or other discharge in a waterbody - Would mobilize contaminants into a waterbody within the immediate vicinity of project components, or would discharge stormwater that would not result in an exceedance of California's surface water quality standards for a contaminant - Would result in a temporary decrease in the quality or alter the quantity of surface water or groundwater - Would result in temporary diversion of surface water or temporary disruption in groundwater flow
	Indirect Effect	- Would mobilize contaminants into a waterbody outside the project site; would discharge stormwater that would not result in an exceedance of California's surface water quality standards for a contaminant - Would minimally disrupt hydrology to a waterbody - Would induce activities that could minimally diminish the quality or alter the quantity of surface water or groundwater - Would increase tributary or river flows that would result in limited sediment scour - Would install new impervious surfaces, causing slightly increased stormwater runoff volume
	Applies to All Effect Types	- Water resources would only be altered/diminished for a short, finite period but would recover - Temporary impacts would be localized in specific areas and not substantially affect or diminish water resources throughout the project site
Potentially Significant	Direct Effect	- Would result in placement of fill, structures, or other discharge in a waterbody - Would dredge or excavate in a waterbody, permanently altering the feature - Would mobilize contaminants into a waterbody within the immediate vicinity of project components, or would discharge stormwater that could result in an exceedance of California's surface water quality standards for a contaminant

Impact Level	Type of Effect	Impact Description
		- Would permanently reduce the quality or alter the quantity of surface water or groundwater - Would permanently divert surface water or disrupt groundwater flow - Would result in substantial excavation below groundwater level
	Indirect Effect	- Would mobilize contaminants into a waterbody outside the project site from project components, or would discharge stormwater that could result in an exceedance of California's surface water quality standards for a contaminant - Would disrupt hydrology to a waterbody - Would induce activities that could moderately/substantially diminish the quality or alter the quantity of surface water or groundwater - Would increase tributary or river flows that would result in substantial sediment scour - Would install new impervious surfaces, causing moderate/substantial increased stormwater runoff volume
Beneficial	Applies to All Effect Types	- Water resources would be adversely altered/diminished for a long-term or permanent period - Impacts would substantially affect or diminish water resources on the project site
	Direct Effect	- Would increase quality or quantity of a waterbody - Would improve the quality or quantity of surface water or groundwater - Would improve surface water or groundwater flow - Would directly remove contaminated sediments from waterbodies
	Indirect Effect	- Would reduce contaminant mobilization into a waterbody - Would improve hydrology to a waterbody - Would induce activities that could improve the quality or quantity of surface water or groundwater - Would decrease existing rate of sediment scour - Would reduce impervious surfaces, causing decreased stormwater runoff volume
	Applies to All Effect Types	Would result in water resources benefits or improvements on the project site

Each of the project alternatives was evaluated to determine the potential for changes to the existing conditions of water resources, in terms of quantity or quality, within the project area. The analysis of water resources and water quality impacts is based on information and data contained in the Water Resources Reports prepared by KPFF, which include site runoff, soil properties, impervious surface areas, and water quality BMPs (KPFF 2022a and 2022b). This section is also informed by the Preliminary Geotechnical Reports prepared for the OSP Specific Plan Site and 327 Harbor Site by Group Delta (Group Delta 2022a and 2022b). In addition to the technical reports stated above, aerial imagery, grading plans, and drainage plans for the project site were reviewed to analyze pre- and post-construction hydrology. Documents published by the California State Water Resources Control Board (SWRCB) and the Los Angeles Regional Water Quality Control Board (LARWQCB), including plans and permits, were reviewed to provide information on existing water quality, as well as required water quality improvement measures.

The environmental impacts of the proposed project with respect to water resources and water quality are based on the potential for changes to the amount of surface water flow, which could alter drainage patterns, contribute to flooding, degrade surface water quality, exceed stormwater

collection infrastructure, and/or effect groundwater supplies and recharge. The existing conditions for water resources and water quality are compared to the future site conditions under project developments to determine impacts.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve ground-disturbing activities or change the existing uses of the project site. Existing slope and drainage patterns would remain the same as existing conditions. No development would occur; therefore, there would be no changes to existing surface water, groundwater, or water quality. Accordingly, the No Project Alternative would not cause a direct or indirect adverse effect related to water resources or water quality.

Proposed Project Alternative

CONSTRUCTION EFFECTS

Because the project site does not contain surface waterbodies, construction of the Proposed Project Alternative would not result in placement of fill, structures, or other discharge in a waterbody. As such, no direct impact to surface water resources would occur during construction of the Proposed Project Alternative.

If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with NPDES Permit No. CAG994004. Dewatering activities would not deplete groundwater supplies because the distance between the project site and the nearest City groundwater well is down-gradient and because potential site dewatering would be conducted only when shallow groundwater conditions are encountered. Therefore, construction of the Proposed Project Alternative would result in less than significant direct impacts to groundwater resources.

As described in Section 4.7.3, construction activities under the Proposed Project Alternative would occur in compliance with the NPDES Construction General Permit (Order 2009-0009-DWQ), which requires preparation and implementation of a SWPPP, which must include erosion and sediment control BMPs that would meet or exceed reduction measures required by the Construction General Permit. Construction activities would also comply with City grading permit regulations (Chapter IX, Article 1, Division 70 of the LAMC), including preparation of an erosion control plan, to further minimize the potential for sedimentation and erosion to decrease surface water quality. In addition, BMPs, erosion and sediment controls, and good housekeeping procedures would be implemented to address any discharges as required by the Construction General Permit. As previously described in Section 7.4.8, *Hazards and Hazardous Materials*, hazardous materials used or encountered during construction, including on-site contaminated soils, would be handled in compliance with all applicable federal, State, and local requirements concerning the handling, storage, use, and disposal of hazardous wastes. Adherence to these requirements would minimize the potential for construction activities associated with the Proposed Project Alternative to degrade surface water and groundwater quality. Therefore, construction of the Proposed Project Alternative would result in less than significant direct and indirect impacts to water resources and water quality.

OPERATIONAL EFFECTS

As described in Section 4.7.3, although the Proposed Project Alternative would result in increased impervious surfaces on the project site compared to current conditions, operation of the Proposed Project Alternative is not anticipated to increase stormwater runoff volumes or change flow directions compared to existing conditions. No major alteration of the project site topography is expected that would alter existing drainage patterns or affect surface water hydrology. Upon buildout of the Proposed Project Alternative, stormwater runoff would continue to flow in an easterly direction to the surrounding streets. Street improvements are expected along the streets within the OSP Specific Plan Site but these improvements would be designed such that the existing drainage conditions are maintained or improved by the proposed development. The Proposed Project Alternative would employ LID techniques and stormwater control measures outlined in Chapters 64.70 and 64.72 of the LAMC and in the City's LID Handbook. With implementation of the required LID BMPs, the runoff rate generated by a 50-year storm at the OSP Specific Plan Site would be 58.46 cubic feet per second (cfs), approximately 0.09 percent less than existing conditions. The runoff rate generated by a 50-year storm at the 327 Harbor Site is currently 1.47 cfs, which would remain the same after construction of the Proposed Project Alternative. Therefore, with regard to hydrology, operation of the Proposed Project Alternative would result in a beneficial impact on the OSP Specific Plan Site and no impact on the 327 Harbor Site, and thus, the Proposed Project Alternative would result in overall beneficial direct and indirect impacts on hydrology.

The implementation of BMPs required by the City's LID standards and LAMC Chapters 64.70 and 64.72, such as trash capture devices, would target the potential pollutants generated during operation of the Proposed Project Alternative and reduce the potential for pollutants to enter the stormwater system. Furthermore, the Proposed Project Alternative would be required to implement an approved Stormwater Management Program and Water Quality Management Program during project operation to ensure stormwater is appropriately retained on site, stormwater runoff flows are not increased above existing conditions, and stormwater discharged into the City's stormwater drainage system meets or exceeds the required water quality standards. With implementation of BMPs that would collect, treat, and discharge flows from the project site, the Proposed Project Alternative would improve the quality of on-site flows, which are not being treated structural stormwater BMPs under existing conditions (KPFF 2022a and 2022b). Therefore, direct and indirect impacts to surface water quality during operation of the Proposed Project Alternative would be less than significant.

Household hazardous materials used during operation of the Proposed Project Alternative, including car fuels, pesticides, and fertilizers, could enter on-site drains. Drains in the proposed parking garages would be designed and maintained according to the Los Angeles Department of Building and Safety requirements (Document No. P/PC 2014-11) to design drains to receive water from automobile drippage, ruptured piping, and other similar conditions. These drains would be directly connected to the public storm drain system and would minimize the potential for contaminated water from parking garages to enter the groundwater. In addition, while increased development may incrementally increase the use of common household hazardous materials (such as cleaning fluids and landscaping maintenance materials), compliance with applicable existing regulations for the handling, transport, use, and disposal of hazardous materials would prevent the proposed project from affecting or expanding any potential areas of groundwater contamination. Therefore, direct and indirect impacts to groundwater quality during operation of the Proposed Project Alternative would be less than significant.

*Historic Rehabilitation Alternative***CONSTRUCTION EFFECTS**

Because the project site does not contain surface waterbodies, construction of the Historic Rehabilitation Alternative would not result in placement of fill, structures, or other discharge in a waterbody. As such, no direct impact to surface water resources would occur during construction of the Historic Rehabilitation Alternative.

If groundwater is encountered during construction of the Historic Rehabilitation Alternative, dewatering activities would comply with NPDES Permit No. CAG994004. Potential site dewatering would be conducted only when shallow groundwater conditions are encountered. Dewatering activities would not deplete groundwater supplies given the distance between the project site and the nearest City groundwater, which is down-gradient. Therefore, construction of the Historic Rehabilitation Alternative would result in less than significant direct impacts to groundwater resources.

Similar to the Proposed Project Alternative, construction activities under the Historic Rehabilitation Alternative would comply with the NPDES Construction General Permit (Order 2009-0009-DWQ) and City grading permit regulations (Chapter IX, Article 1, Division 70 of the LAMC). Accordingly, a SWPPP and an erosion control plan would be prepared and implemented during construction of the Historic Rehabilitation Alternative. Implementation of a SWPPP and an erosion control plan would minimize the potential for construction activities to decrease surface water quality. In addition, implementation of BMPs, erosion and sediment controls, and good housekeeping procedures would address any discharges as required by the Construction General Permit. Hazardous materials used or encountered during construction, including on-site contaminated soils, would be handled in compliance with all applicable federal, State, and local requirements concerning the handling, storage, use, and disposal of hazardous wastes. Adherence to these requirements would minimize the potential for construction activities associated with the Historic Rehabilitation Alternative to degrade surface water and groundwater quality. Therefore, construction of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts to water resources and water quality.

OPERATIONAL EFFECTS

Although the Historic Rehabilitation Alternative would result in increased impervious surfaces on the 327 Harbor Site compared to current conditions, operation of the Historic Rehabilitation Alternative is not anticipated to increase stormwater runoff volumes or change flow directions compared to existing conditions. No major alteration of the project site topography is expected that would alter existing drainage patterns or affect surface water hydrology. Upon buildout of the Historic Rehabilitation Alternative, stormwater runoff would continue to flow in an easterly direction to the surrounding streets. Because ground distance would occur only on the 327 Harbor Site under the Historic Rehabilitation Alternative, the runoff rate generated by a 50-year storm at the OSP Specific Plan Site would remain the same as existing conditions. Additionally, the runoff rate generated by a 50-year storm at the 327 Harbor Site would also remain the same after construction of the Historic Rehabilitation Alternative. Therefore, the Historic Rehabilitation Alternative would result in no direct or indirect impact on hydrology.

Implementation of required LID BMPs would target the potential pollutants generated during operation of the Historic Rehabilitation Alternative and reduce the potential for pollutants to enter the stormwater system. Furthermore, the Historic Rehabilitation Alternative would be required to implement an approved Stormwater Management Program and Water Quality Management Program

during project operation to ensure stormwater discharged into the City's stormwater drainage system meets or exceeds the required water quality standards. With implementation of BMPs that would collect, treat, and discharge flows from the 327 Harbor Site, the Historic Rehabilitation Alternative would improve the quality of on-site flows on the 327 Harbor Site, which are not being treated structural stormwater BMPs under existing conditions (KPFF 2022b). Therefore, direct and indirect impacts to surface water quality during operation of the Historic Rehabilitation Alternative would be less than significant.

Household hazardous materials used during operation of the Historic Rehabilitation Alternative could enter on-site drains. Drains in the proposed parking garage on the 327 Harbor Site would be designed and maintained according to the Los Angeles Department of Building and Safety requirements (Document No. P/PC 2014-11). These drains would be directly connected to the public storm drain system and would minimize the potential for contaminated water from the parking garage to enter the groundwater. In addition, while increased development may incrementally increase the use of common household hazardous materials, compliance with applicable existing regulations for the handling, transport, use, and disposal of hazardous materials would prevent the proposed project from affecting or expanding any potential areas of groundwater contamination. Therefore, direct and indirect impacts to groundwater quality during operation of the Historic Rehabilitation Alternative would be less than significant.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

Because the project site does not contain surface waterbodies, construction of the Partial Preservation Alternative would not result in placement of fill, structures, or other discharge in a waterbody. As such, no direct impact to surface water resources would occur during construction of the Partial Preservation Alternative.

If groundwater is encountered during construction of the Partial Preservation Alternative, dewatering activities would comply with NPDES Permit No. CAG994004. Potential site dewatering would be conducted only when shallow groundwater conditions are encountered. Dewatering activities would not deplete groundwater supplies given the distance between the project site and the nearest City groundwater, which is down-gradient. Therefore, construction of the Partial Preservation Alternative would result in less than significant direct impacts to groundwater resources.

Similar to the Proposed Project Alternative, construction activities under the Partial Preservation Alternative would comply with the NPDES Construction General Permit (Order 2009-0009-DWQ) and City grading permit regulations (Chapter IX, Article 1, Division 70 of the LAMC). Accordingly, a SWPPP and an erosion control plan would be prepared and implemented during construction of the Partial Preservation Alternative. Implementation of a SWPPP and an erosion control plan would minimize the potential for construction activities to decrease surface water quality. In addition, implementation of BMPs, erosion and sediment controls, and good housekeeping procedures would address any discharges as required by the Construction General Permit. Hazardous materials used or encountered during construction, including on-site contaminated soils, would be handled in compliance with all applicable federal, State, and local requirements concerning the handling, storage, use, and disposal of hazardous wastes. Adherence to these requirements would minimize the potential for construction activities associated with the Partial Preservation Alternative to degrade surface water and groundwater quality. Therefore, construction of the Partial Preservation Alternative would result in less than significant direct and indirect impacts to water resources and water quality.

OPERATIONAL EFFECTS

Although the Partial Preservation Alternative would result in increased impervious surfaces on the project site compared to current conditions, operation of the Partial Preservation Alternative is not anticipated to increase stormwater runoff volumes or change flow directions compared to existing conditions. No major alteration of the project site topography is expected that would alter existing drainage patterns or affect surface water hydrology. Upon buildout of the Partial Preservation Alternative, stormwater runoff would continue to flow in an easterly direction to the surrounding streets. The runoff rates generated by a 50-year storm at the OSP Specific Plan Site and the 327 Harbor Site would remain the same as, or be less than, existing conditions. Therefore, the Partial Preservation Alternative would result in no direct or indirect impact on hydrology.

Implementation of required LID BMPs would target the potential pollutants generated during operation of the Partial Preservation Alternative and reduce the potential for pollutants to enter the stormwater system. Furthermore, the Partial Preservation Alternative would be required to implement an approved Stormwater Management Program and Water Quality Management Program during project operation to ensure stormwater discharged into the City's stormwater drainage system meets or exceeds the required water quality standards. With implementation of BMPs that would collect, treat, and discharge flows from the project site, the Partial Preservation Alternative would improve the quality of on-site flows, which are not being treated structural stormwater BMPs under existing conditions (KPFF 2022a and 2022b). Therefore, direct and indirect impacts to surface water quality during operation of the Partial Preservation Alternative would be less than significant.

Household hazardous materials used during operation of the Partial Preservation Alternative could enter on-site drains. Drains in the proposed parking garages would be designed and maintained according to the Los Angeles Department of Building and Safety requirements (Document No. P/PC 2014-11). These drains would be directly connected to the public storm drain system and would minimize the potential for contaminated water from the parking garage to enter the groundwater. In addition, while increased development may incrementally increase the use of common household hazardous materials, compliance with applicable existing regulations for the handling, transport, use, and disposal of hazardous materials would prevent the proposed project from affecting or expanding any potential areas of groundwater contamination. Therefore, direct and indirect impacts to groundwater quality during operation of the Partial Preservation Alternative would be less than significant.

Cumulative Effects

Cumulative development near the project site includes specific known development projects and general ambient growth. A total of 12 cumulative projects have been identified in a 0.5-mile radius of the project site, as listed in Section 3.4, *Cumulative Development*. The 12 cumulative projects considered within vicinity of the project site anticipate adding approximately 1,508 residential units, as well as an 80-room hotel and a variety of new commercial opportunities, to the area. Cumulative development has the potential to impact water resources and water quality during construction and operational activities.

Similar to the project build alternatives, the cumulative projects are located on infill sites that contain no surface waterbodies, and therefore, no cumulative impact to surface waterbodies would occur.

The geographic context for the cumulative impact analysis on surface water hydrology is the Dominguez Channel Watershed. Similar to the project build alternatives, the cumulative projects are located on infill sites that contain impervious surfaces. In accordance with City requirements,

cumulative development would be required to implement appropriate BMPs designed to retain and treat, at minimum, the first flush or the equivalent of the 85th percentile, 24-hour runoff event and first 0.75-inch of rainfall for any storm event. The City of Los Angeles Department of Public Works would review each future development project on a case-by-case basis to ensure cumulative development would not significantly alter surface water hydrology and stormwater flows and sufficient local and regional infrastructure is available to accommodate stormwater runoff. Therefore, potential cumulative impacts related to surface water hydrology would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

The geographic context for the cumulative impact analysis on groundwater resources is the West Coast Groundwater Sub-basin. Development of the 12 cumulative projects could require dewatering operations or result in changes to site imperviousness within their respective project locations, which could potentially impact groundwater hydrology. However, similar to the project build alternatives, cumulative development would not involve long-term groundwater extraction and would be required to comply with City and regional regulations requiring the implementation of LID BMPs and any required mitigation of potential groundwater hydrology impacts. In addition, as the cumulative projects are within an urbanized area on infill sites, the potential reduction in groundwater recharge due to the overall net change in impervious area would be minimal in the context of the regional groundwater basin. Therefore, potential cumulative impacts related to groundwater hydrology would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

Similar to the project build alternatives, cumulative development would be subject to NPDES and local and regional water quality requirements both during project construction and operation. All projects that disturb 1.0 acre or more of soil must comply with the requirements of the Construction General Permit, and all projects would be required to comply with the City grading permit. Compliance with these regulations would minimize the potential for significant cumulative impacts due to construction activities. Cumulative development would also be required to comply with the City LID Ordinance and implement LID BMPs to ensure the proper retention and treatment of stormwater on the project site to protect water quality. Additionally, each project that creates and/or replaces 5,000 sf or more of impervious surface would be required to comply with the Los Angeles County MS4 Permit, including preparation of a Stormwater Management Program to determine appropriate BMPs to minimize water quality impacts. Compliance with the Construction General Permit and/or City grading permit would also ensure the proper handling, storage, use, and disposal of hazardous materials and maintenance of construction equipment to prevent surface water and groundwater contamination. With compliance with the applicable regulations during construction and operation, potential cumulative impacts related to surface water and groundwater quality would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

7.4.15 Utilities and Service Systems

This section analyzes the potential impacts of the project alternatives on utilities and service systems in the project area. Impacts to utilities and service systems, which include water supply and distribution, sanitary wastewater collection and treatment, solid waste, electricity, natural gas, communication systems, and stormwater management, can be either direct or indirect. A direct impact would occur if a project alternative would impact the delivery of utilities to customers during construction or operation, or if it would require the relocation of utility infrastructure. An indirect impact would occur if a project alternative would induce other changes that could affect utilities. For

example, an indirect effect could include changes in levels of security or reliability as a result of new flood protection measures in the project site.

7.4.15.1 Affected Environment

The project area contains existing utilities and service systems, as briefly described below. For additional information regarding existing water supply and distribution; wastewater collection and treatment; solid waste; and electricity, natural gas, and communication systems, the reader is referred to Section 4.15, *Utilities and Service Systems*.

Water Supply and Distribution

As described in Section 4.15.1.1, LADWP is responsible for providing water in the city and ensuring the water quality meets applicable California health standards for drinking water. In Fiscal Year (FY) 2020-2021, which is the latest available data, LADWP had an available water supply of 508,359 acre-feet (AF). Based on projections in LADWP's 2020 Urban Water Management Plan (UWMP), adequate water supplies would be available to meet the projected demands of its service area under normal, single-dry, and multi-dry year conditions through 2045 (LADWP 2021). Current water use associated with the existing Rancho San Pedro development is 34,061,199 gallons per year (LADWP 2022).

Wastewater Collection and Treatment

As described in Section 4.15.2.1, existing wastewater generation for the project site was calculated using standard wastewater generation rates from the Los Angeles Bureau of Sanitation's (LASAN) Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories. Total existing average daily wastewater generation is approximately 75,420 gallons per day (gpd). The project site is located within the LASAN Terminal Island Service Area and is served by the Terminal Island Sanitary Sewer System and Terminal Island Water Reclamation Plant. The existing design capacity of the Terminal Island Sanitary Sewer System and Terminal Island Water Reclamation Plant is approximately 30 million gallons per day (mgd), and approximately 15 mgd of wastewater is treated at the water reclamation plant on a dry weather day (LASAN 2022a).

Solid Waste

As described in Section 4.15.3.1, landfills that serve Los Angeles County have a remaining daily intake capacity of 25,640 tons per day (tpd). The existing uses on the OSP Specific Plan Site generate approximately 5,846 pounds of solid waste per day (City of Los Angeles 2006).

Electricity, Natural Gas, and Communication Systems

As described in Section 4.15.4.1, electric power is provided to the project site by LADWP, while natural gas is provided by SoCalGas, and telecommunications services are provided by private companies such as Spectrum and Frontier. Electric power to the project site is available from overhead power lines throughout the surrounding streets including O'Farrell Street, Santa Cruz Street, 1st Street, Palos Verdes Street, 3rd Street, and Centre Street. Natural gas is supplied to the area through a system of existing gas mains located under the streets and public rights-of-way. Natural gas is delivered to the project site through natural gas facilities underneath the adjacent public streets. The cellular towers closest to the project site are located at 222 West 6th Street in San Pedro, approximately 0.3 mile south of the OSP Specific Plan Site; 1350 West 25th Street in San Pedro, approximately 2 miles southwest of the OSP Specific Plan Site; and 3900 Crest Road in Palos Verdes, approximately 3 miles west of the OSP Specific Plan Site.

Stormwater Management

Stormwater runoff in the project vicinity is generally collected and conveyed through storm drain facilities located in public roadways. Underground storm drainage facilities in San Pedro are owned and maintained by the City of Los Angeles, with stormwater discharges ultimately flowing into the Dominguez Channel, which discharges to the inner Port of Los Angeles. The reader is also referred to Section 7.4.15 for a discussion of existing conditions related to stormwater runoff and collection.

Regulatory Setting

The following regulations related to transportation and circulation are discussed in Sections 4.15.1.2, 4.15.2.2, 4.15.3.2, and 4.15.4.2:

- Federal Energy Policy Act of 2005
- California Urban Water Management Plan Act
- California SBs 7, 221, 610, 649, 1374, 1383, and 1389
- California SB X7-7 (Water Conservation Act of 2009)
- California Sustainable Groundwater Management Act of 2014
- California ABs 341 and 1826
- California AB 939 (Integrated Waste Management Act of 1089)
- California AB 1327 (Solid Waste Reuse and the Recycling Access Act of 1991)
- Title 20 of the CCR
- CALGreen Code (Part 11 of Title 24 of the CCR)
- California Executive Orders B-40-17, N-10-21
- California Department of Resources Recycling and Recovery (CalRecycle) Zero Waste California
- Metropolitan Water District of Southern California (MWD) 2020 Urban Water Management Plan
- MWD 2015 Integrated Resources Plan
- MWD Water Surplus and Drought Management Plan
- MWD Long-Term Conservation Plan
- MWD Water Supply Allocation Plan
- Los Angeles Countywide Integrated Waste Management Plan
- Los Angeles Department of Water and Power 2020 Urban Water Management Plan
- City of Los Angeles Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan Framework Element
- San Pedro Community Plan
- LAMC, including the Los Angeles Green Building Code
- City of Los Angeles Integrated Resources Plan
- City of Los Angeles Solid Waste Integrated Resources Plan
- RENEW LA Plan
- City of Los Angeles Space Allocation Ordinance
- Citywide Construction and Demolition Debris Recycling Ordinance

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects to utilities and service systems are provided in Table 7-35.

Table 7-35 Utilities and Service Systems Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	- Would not relocate existing utilities infrastructure - Would not disrupt utilities or service systems, including causing outages or the decrease in availability or level of service (e.g., reduced sewer capacity, reduced water pressure) - Would not increase utility consumption beyond existing or planned capacity
	Indirect Effect	- Would not induce any further changes to increase the demand of utilities services beyond existing or planned capacity - Would not increase risk of utilities infrastructure to identifiable hazards, such as flooding - Would not induce increases to the cost of utilities for consumers
	Applies to All Effect Types	- No discernable changes to or decreases in utilities or service systems in the project area - Would only alter utilities or service systems for an indiscernible or negligible period of time - Changes to utilities and service systems would not conflict with laws or regulations
Less Than Significant	Direct Effect	- Would require minor relocations of existing utilities infrastructure that would not result in substantial service disruption - Would result in temporary disruptions to utilities and service services - Would minimally or temporarily increase utility consumption but not above existing capacity
	Indirect Effect	- Would not induce any further changes to increase the demand of utilities services such that supply or distribution capacities are likely to be exceeded - Would temporarily increase risk of utilities infrastructure to identifiable hazards, such as flooding - Would temporarily induce an increase in the cost of utilities for consumers
	Applies to All Effect Types	- Utilities and service systems would only be altered/diminished for a short, finite period - Short-term impacts would be localized in specific areas and would not substantially affect or diminish utilities or service systems throughout the project area - Changes to utilities and service systems would not conflict with laws or regulations
Potentially Significant	Direct Effect	- Would require relocations of existing utilities infrastructure that would result in substantial service disruption - Would result in permanent, prolonged, or repeated disruptions to utilities and service systems - Would substantially or permanently increase utility consumption above existing or planned capacity
	Indirect Effect	Would induce further changes that would increase the demand of utilities services such that supply or distribution capacities are likely to be exceeded

Impact Level	Type of Effect	Impact Description
		- Would increase long-term risk of utilities infrastructure to identifiable hazards, such as flooding - Would induce long-term increases to costs of utilities for consumers
	Applies to All Effect Types	- Utilities or service systems would be adversely altered or diminished for an extended or permanent period - Impacts would substantially affect or diminish utilities and service systems throughout the project area - Changes to utilities and service systems may conflict with existing laws and regulations
Beneficial	Direct Effect	- Would result in changes that improve the capacity, delivery, or efficiency of utilities and service systems in the project area - Would decrease utility consumption
	Indirect Effect	- Would induce further changes that would decrease the demand of utilities services - Would decrease risk of utilities infrastructure to identifiable hazards, such as flooding - Would induce long-term decreases to costs of utilities for consumers
	Applies to All Effect Types	Would result in utilities or service systems benefits, improvements, and/or increases in the project area

The project alternatives were each evaluated to determine their potential to impact utility services within the project area. To conduct this analysis, each considered alternative was overlaid with existing (and planned) utility services, and relationships between project components and these resources were identified. Using these data, potential direct impacts to hard utility infrastructure, as well as corresponding disruptions in service, were identified. In addition, a qualitative analysis of anticipated changes to the supply, demand, and security of utility services was conducted. This qualitative analysis considered other potential impacts to the project area from implementation of the project and compared these potential changes with the existing conditions. Overall, potential impacts were analyzed in terms of potential infrastructure relocations and disruptions to services; short-term and long-term changes to supply, demand, and capacity of services; and changes in security or reliability of services, as affected both directly and indirectly by each considered alternative.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve ground-disturbing construction activities or change the existing uses or population of the project site, and therefore, would not affect existing utilities and service systems. As such, the No Project Alternative would result in no direct or indirect impacts to utilities and service systems.

*Proposed Project Alternative***CONSTRUCTION EFFECTS**

The Proposed Project Alternative would include development of a new potable water distribution system to connect to LADWP's existing water supply, domestic and fire water connections, new or relocated sewer lines, upgrades to the existing electricity lines on/beneath the project site, natural gas connections, and telecommunications connections.

Construction activity associated with the installation and/or upgrading of water and sewer lines would primarily involve trenching to place the lines below the surface. Installation of new water and sewer infrastructure would be limited to on- and off-site work associated with connections to existing infrastructure, as well as water and sewer main upgrades, if necessary. Prior to ground disturbance, project contractors would coordinate with LADWP and LASAN to identify the locations and depth of all water and sewer mains and lines. LADWP and LASAN would be notified in advance of proposed ground disturbance activities to avoid existing underground utilities and disruption of existing water service to current site occupants and surrounding land uses. Upgrades and new connections for electric power, natural gas, and telecommunications infrastructure would also be coordinated with the appropriate service providers. Electric power infrastructure would be installed in coordination with LADWP. No improvements to the existing natural gas infrastructure or new natural gas infrastructure would be required other than minor construction activities for connections to the existing lines. Connections to the existing natural gas lines would be coordinated with SoCalGas. Prior to construction, the construction contractors would notify and coordinate with applicable telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated during construction. This would involve disconnecting existing connections and establishing new connections to the proposed structures. Such improvements would be localized in nature and would utilize existing conduit and service lines. Overall, through coordination with LADWP, LASAN, SoCalGas, and telecommunication providers, construction of water, sewer, electric power, natural gas, and telecommunications infrastructure would not result in substantial utility service disruptions during construction of the Proposed Project Alternative.

Water would be used during construction primarily for dust control during soil excavation/export and re-compaction during the demolition, site preparation, and grading stages. Water demand for dust suppression is highly dependent on a number of site-specific variables, including soil properties, antecedent moisture conditions, and other climatic factors. A 2017 analysis prepared by SCAQMD estimated water demand associated with Rule 403 dust suppression requirements for construction sites in SCAQMD jurisdiction at approximately 1,000 gallons per acre per day (SCAQMD 2017). As described in Section 4.15.1.3, on the OSP Specific Plan Site, a total of 897 days of construction would require dust suppression, resulting in approximately 6,147,526 gallons of water use over the approximately 14-year construction period, or an average of 439,109 gallons of water per year. At the 327 Harbor Site, approximately 27 days of construction would require dust suppression, resulting in approximately 15,149 gallons of water use during construction. This demand would be short-term and temporary in nature and would represent less water usage than current water use associated with the existing Rancho San Pedro development, which is 34,061,199 gallons per year. Given the temporary and minimal amount of construction water demand, there would be sufficient water supplies to provide water during construction, and construction activities would not increase water utility use above existing capacity.

Solid waste would be generated during demolition and construction activities of the Proposed Project Alternative. During construction, existing development on the OSP Specific Plan Site would be

demolished to prepare the site for the Proposed Project Alternative. Demolition would generate approximately 18,193 cubic yards of demolished materials. Grading activities would result in approximately 382,945 cubic yards of soil export. These materials would be reused or recycled to the maximum extent feasible, and all remaining materials would be transported to the Sunshine Canyon Landfill in unincorporated Los Angeles County and the Azusa Land Reclamation in the City of Azusa. As discussed in Section 4.15.3.3, Sunshine Canyon Landfill and Azusa Land Reclamation Company Landfill have an estimated remaining capacity of approximately 77,900,000 cubic yards and 51,512,201 cubic yards, respectively (CalRecycle 2023a and 2023b). The addition of 382,945 cubic yards of soil and 18,193 cubic yards of demolition debris would represent less than 1 percent of the remaining capacity of these landfills and would not result in an exceedance of the remaining capacity or permitted daily intake of the Sunshine Canyon Landfill or Azusa Land Reclamation Company Landfill. The handling of all debris and waste generated during construction of the proposed project would be subject to the latest CALGreen Code requirements and California AB 939 requirements for salvaging, recycling, and reuse of materials from construction activity. Compliance with LAMC Section 66.32 would ensure at least 75 percent of the demolition and construction waste generated by future development would be diverted from landfills serving the city. Therefore, the generation of solid waste during construction of the Proposed Project Alternative would not result in an exceedance of capacity of existing landfills.

For the reasons described above, construction of the Proposed Project Alternative would result in less than significant direct and indirect impacts to utilities and service systems.

OPERATIONAL EFFECTS

As described in Section 4.15, *Utilities and Service Systems*, upon completion of construction activities, the water distribution system, sewer system, electric facilities, and natural gas connections serving the project area would be adequately sized to accommodate the proposed land uses and density. Occasional minor maintenance activities may be required to repair infrastructure as it ages. However, future relocation and expansion of these utilities during project operation are not anticipated, and operation of the Proposed Project Alternative would not substantially disrupt utility services. Because existing telecommunication providers already provide services to the commercial and residential buildings in the vicinity of the project area, it is anticipated that existing telecommunications facilities would be sufficient to support the Proposed Project Alternative's needs for telecommunication services and project operation would not disrupt telecommunications services.

As described in Section 4.15.1.3, operation of the Proposed Project Alternative would result in a net increase in water demand of approximately 126.94 acre-feet per year (AFY). LADWP has determined that adequate water supplies would be available to meet the total net water demand of 126.94 AFY for the Proposed Project Alternative, including during normal, single-dry, and multiple-dry water years, as well as the existing and planned future demands on LADWP (LADWP 2022). Therefore, sufficient water supplies would be available to serve the Proposed Project Alternative during operation.

Operation of the Proposed Project Alternative would increase wastewater flows and treatment demand for the project site. As described in Section 4.15.2.3, the Proposed Project Alternative would result in a net increase in wastewater generation of approximately 150,902 gpd (or 0.151 mgd) (LASAN 2012). Wastewater generated by the Proposed Project Alternative would be treated at the Terminal Island Water Reclamation Plant, which has a treatment capacity of 30 mgd, and currently treats approximately 15 mgd of wastewater on a dry weather day (LASAN 2022a). The Proposed Project Alternative's net wastewater generation rate would be approximately 1 percent of the

existing remaining capacity at Terminal Island Water Reclamation Plant. As indicated in the Requests for Wastewater Service Information letters provided by LASAN, the Terminal Island Water Reclamation Plant has sufficient capacity to accommodate the proposed project in addition to LASAN's existing commitments (LASAN 2022b and 2022c). Therefore, the Proposed Project Alternative's wastewater generation would not exceed the capacity of existing wastewater treatment facilities.

As discussed in Section 4.15.4, the Proposed Project Alternative's electricity consumption would be 17,403,690 kilowatt-hours (or 17.4 gigawatt-hours) per year (Appendix B). This would represent less than 0.1 percent of LADWP's projected electricity sales of 26,654 gigawatt-hours in FY 2036-2037, the Proposed Project Alternative's anticipated buildout year (LADWP 2017). The Proposed Project Alternative's annual net natural gas demand of 916 cubic feet per year or 2.5 cubic feet per day would represent less than 0.0001 percent of the 2035 (the latest year for which projections are available) forecasted consumption of 4,857 million cubic feet per day in SoCalGas' planning area (SoCalGas 2022). Therefore, the Proposed Project Alternative's demand for electricity and natural gas would not exceed the capacity of existing electric power and natural gas infrastructure.

As described in Section 4.15.3.3, operation of the Proposed Project Alternative would result in a net increase of 7.2 tpd of solid waste (CalRecycle 2019). Landfills serving Los Angeles have a total remaining daily capacity of 25,640 tpd (Los Angeles County Department of Public Works 2021). Solid waste generated by the Proposed Project Alternative would account for less than 1 percent of the remaining daily capacity of landfills serving Los Angeles. Therefore, the Proposed Project Alternative would not generate solid waste in excess of the capacity of local infrastructure. In addition, the Proposed Project Alternative would be consistent with the Statewide organic waste and recycling goals and requirements established by California AB 341, AB 939, AB 1826, and SB 1383 and the CALGreen Code, as well as local goals and policies for solid waste diversion outlined in the City's Solid Waste Integrated Resources Plan (SWIRP), RENEW LA Plan, General Plan Framework Element, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, and Curbside Recycling Program.

As previously discussed, the project area is not in a flood hazard zone (Federal Emergency Management Agency 2021), and the Proposed Project Alternative would not include features that would subject existing or proposed utilities to flood risk. The Proposed Project Alternative would employ LID techniques and stormwater control measures outlined in LAMC Chapters 64.70 and 64.72 and the City's LID Handbook. With implementation of the required LID BMPs, the runoff rate generated by a 50-year storm at the OSP Specific Plan Site would be 58.46 cfs, approximately 0.09 percent less than existing conditions. The runoff rate generated by a 50-year storm at the 327 Harbor Site is currently 1.47 cfs, which would remain the same after construction of the Proposed Project Alternative. Therefore, the Proposed Project Alternative would not increase the risk of utilities infrastructure to flood hazards.

In addition, as existing utilities infrastructure and service capacity are available to serve the Proposed Project Alternative, this alternative would not be anticipated to induce an increase in the cost of utilities for consumers. For the reasons described above, operation of the Proposed Project Alternative would result in less than significant direct and indirect impacts to utilities and service systems.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

The Historic Rehabilitation Alternative would include minor upgrades and repairs to the existing electrical systems and sewer and water infrastructure on the OSP Specific Plan Site and would create new connections at the 327 Harbor Site to existing water, sewer, and natural gas mains, as well as electricity and telecommunications lines, within the adjacent roadways. Construction activities associated with the installation and/or upgrading of water and sewer lines would primarily involve trenching to place the lines below the surface. Improvements to the existing water and sewer infrastructure serving the OSP Specific Plan Site, if required, as well as connections to serve the proposed new structure at the 327 Harbor Site, would be coordinated with LADWP and LASAN prior to construction to identify the locations and depth of all water and sewer mains and lines. LADWP and LASAN would be notified in advance of proposed ground disturbance activities to avoid existing underground utilities and disruption of existing services to current site occupants and surrounding land uses. Upgrades and connections to the existing electric power, natural gas, and telecommunications infrastructure would also be coordinated with the appropriate service provider. Electric power infrastructure would be installed in coordination with LADWP. Because the residences constructed at the 327 Harbor Site would be all-electric, no natural gas infrastructure would be required. Prior to construction, the construction contractors would notify and coordinate with applicable telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated during construction. This would involve disconnecting existing connections and establishing new connections to the proposed structures. Such improvements would be localized in nature and would utilize existing conduit and service lines. Overall, through coordination with LADWP, LASAN, and telecommunication providers, construction of water, sewer, electric power, and telecommunications infrastructure would not result in substantial utility service disruptions.

Water would be used during construction primarily for dust control during soil excavation/export, site preparation, and grading at the 327 Harbor Site. At the 327 Harbor Site, approximately 27 days of construction would require dust suppression, resulting in approximately 15,149 gallons of water use during construction (SCAQMD 2017). This demand would be short-term and temporary in nature and would represent less water usage than current water use associated with the existing Rancho San Pedro development. Given the temporary and minimal amount of construction water demand, there would be sufficient water supplies to provide adequate water during construction.

Solid waste would be generated during construction of the Historic Rehabilitation Alternative. Excavation on the 327 Harbor Site would remove approximately 4,300 cubic yards of soil, which would be transported to the Sunshine Canyon Landfill and Azusa Land Reclamation Company Landfill. The addition of 4,300 cubic yards of soil would represent less than 1 percent of the remaining capacity of these landfills and would not result in an exceedance of the remaining capacity or permitted daily intake of the Sunshine Canyon Landfill or Azusa Land Reclamation Company Landfill. The handling of all debris and waste generated during construction of the proposed project would be subject to the latest CALGreen Code requirements and California AB 939 requirements for salvaging, recycling, and reuse of materials from construction activity. Compliance with LAMC Section 66.32 would ensure at least 75 percent of the construction waste generated by future development would be diverted from landfills serving the city. Therefore, the generation of solid waste during construction of the Historic Rehabilitation Alternative would not result in an exceedance of capacity of existing landfills.

For the reasons described above, construction of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts to utilities and service systems.

OPERATIONAL EFFECTS

Upon completion of construction activities, the water distribution system, sewer system, electric facilities, and natural gas connections serving the project site would be adequate to serve the proposed uses. Occasional minor maintenance activities may be required to repair infrastructure as it ages. However, future relocation and expansion of these utilities during operation of the Historic Rehabilitation Alternative are not anticipated, and project operation would not substantially disrupt these utility services. Because existing telecommunication providers already provide services to the commercial and residential buildings in the project area, it is anticipated that existing telecommunications facilities would be sufficient to support the Historic Rehabilitation Alternative's needs for telecommunication services, and project operation would not substantially disrupt telecommunications services.

Operation of the Historic Rehabilitation Alternative would result in a net increase of 7.9 AFY of water demand due to the operation of 47 residential units at the 327 Harbor Site, based on the LADWP standard water use factors and not accounting for the proposed water efficiency features (LADWP 2022). LADWP has determined that adequate water supplies would be available to meet a net water demand of 126.94 AFY at the project site under this alternative, including during normal, single-dry, and multiple-dry water years, as well as the existing and planned future demands on LADWP (LADWP 2022). Therefore, sufficient water supplies would be available to serve the Historic Rehabilitation Alternative during its operation.

During operation, the Historic Rehabilitation Alternative would increase wastewater flows and treatment demand for the project area. Based on LASAN's wastewater generation factors, the Historic Rehabilitation Alternative would generate approximately 7,050 gpd (0.007 mgd) of net increased wastewater generation due to the addition of residential units at the 327 Harbor Site (LASAN 2012). Wastewater generated by the Historic Rehabilitation Alternative would be treated at the Terminal Island Water Reclamation Plant, which has a treatment capacity of 30 mgd, and currently treats approximately 15 mgd of wastewater on a dry weather day. The Historic Rehabilitation Alternative's net wastewater generation rate would be less than 1 percent of the existing remaining capacity at Terminal Island Water Reclamation Plant. Therefore, the Historic Rehabilitation Alternative's wastewater generation would not exceed the capacity of existing wastewater treatment facilities.

The Historic Rehabilitation Alternative would increase electricity demand on the project site to accommodate the 47 new residential units at the 327 Harbor Site under the Historic Rehabilitation Alternative. The Historic Rehabilitation Alternative would demand 304,146 kilowatt-hours per year of electricity (Appendix B). Because the residences constructed at the 327 Harbor Site would be all-electric, no natural gas infrastructure would be required; therefore, natural gas usage on the project site would remain the same as under existing conditions (3,322,489 cubic feet per year). As previously discussed, LADWP projects 26,654 GWh of electricity sales in FY 2036-2037 (LADWP 2017), and the incremental increased demand for electricity under this alternative would be accommodated by LADWP. Therefore, the Historic Rehabilitation Alternative's demand for electricity and natural gas would not exceed the capacity of existing electric and natural gas infrastructure.

Operation of the Historic Rehabilitation Alternative would be anticipated to result in a net increase of approximately 0.29 tpd of solid waste (CalRecycle 2019). Landfills serving Los Angeles have a total remaining daily capacity of 25,640 tpd, and solid waste generated by the Historic Rehabilitation Alternative would account for less than 1 percent of the remaining daily capacity of landfills serving

Los Angeles. Therefore, the Historic Rehabilitation Alternative would not generate solid waste in excess of the capacity of local infrastructure. In addition, the Historic Rehabilitation Alternative would be consistent with the Statewide organic waste and recycling goals and requirements established by California AB 341, AB 939, AB 1826, and SB 1383 and the CALGreen Code, as well as local goals and policies for solid waste diversion outlined in the City's SWIRP, RENEW LA Plan, General Plan Framework Element, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, and Curbside Recycling Program.

As previously discussed, the project area is not in a flood hazard zone, and the Historic Rehabilitation Alternative would not include features that would subject existing or proposed utilities to flood risk. At the 327 Harbor Site, the Historic Rehabilitation Alternative would employ LID techniques and stormwater control measures outlined in LAMC Chapters 64.70 and 64.72 and the City's LID Handbook. The runoff rate generated by a 50-year storm at the 327 Harbor Site is currently 1.47 cfs, which would remain the same after construction of the Historic Rehabilitation Alternative. Existing stormwater management and stormwater runoff rates at the OSP Specific Plan Site would be maintained consistent with current conditions. Therefore, the Historic Rehabilitation Alternative's would not increase the risk of utilities infrastructure to flood hazards.

In addition, as existing utilities infrastructure and service capacity are available to serve the Historic Rehabilitation Alternative, this alternative would not be anticipated to induce an increase in the cost of utilities for consumers. For the reasons described above, operation of the Historic Rehabilitation Alternative would result in less than significant direct and indirect impacts to utilities and service systems.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

The Partial Preservation Alternative would include connections to water distribution system, new or relocated sewer lines, upgrades to the existing electricity lines on/beneath the project site, natural gas connections, and telecommunications connections.

Construction activities associated with the installation and/or upgrading of water and sewer lines would primarily involve trenching to place the lines below the surface. Installation of new water and sewer infrastructure would be limited to on- and off-site work associated with connections to existing water and sewer infrastructure, as well as water and sewer main upgrades, if necessary. Prior to ground disturbance, project contractors would coordinate with LADWP and LASAN to identify the locations and depth of all water and sewer mains and lines. LADWP and LASAN would be notified in advance of proposed ground disturbance activities to avoid existing underground utilities and disruption of existing water service to current site occupants and surrounding land uses. Upgrades and new connections for electric power, natural gas, and telecommunications infrastructure would also be coordinated with the appropriate service providers. Electric power infrastructure would be installed in coordination with LADWP. No improvements to the existing natural gas infrastructure or new natural gas infrastructure would be required other than minor construction activities for connections to the existing lines. Connections to the existing natural gas lines would be coordinated with SoCalGas. Prior to construction, the construction contractors would notify and coordinate with applicable telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated during construction. This would involve disconnecting existing connections and establishing new connections to the proposed structures. Such improvements would be localized in nature and would utilize existing conduit and service lines.

Overall, through coordination with LADWP, LASAN, SoCalGas, and telecommunication providers, construction of water, sewer, electric power, natural gas, and telecommunications infrastructure would not result in substantial utility service disruptions.

Water would be used during construction primarily for dust control during soil excavation/export and re-compaction during the demolition, site preparation, and grading stages. Water demand for dust suppression is highly dependent on a number of site-specific variables, including soil properties, antecedent moisture conditions, and other climatic factors. On the OSP Specific Plan, a total of 426 days of construction would require dust suppression, resulting in approximately 2,950,170 gallons of water use over the approximately 11-year construction period, or an average of 268,197 gallons of water per year (SCAQMD 2017). At the 327 Harbor Site, there would be approximately 27 days of construction requiring dust suppression, resulting in approximately 15,149 gallons of water use during construction (SCAQMD 2017). This demand would be short-term and temporary in nature and would represent less water usage than current water use associated with the existing Rancho San Pedro development, which is 34,061,199 gallons per year. Given the temporary and minimal amount of construction water demand, there would be sufficient water supplies to provide water during construction, and construction activities would not increase water utility use above existing capacity.

Solid waste would be generated during demolition and construction activities of the Partial Preservation Alternative. Demolition would generate approximately 7,743 cubic yards of demolished materials. Grading activities would result in approximately 158,496 cubic yards of soil export. Demolished materials, construction debris, and soils would be reused or recycled to the maximum extent feasible, and all remaining materials would be transported to the Sunshine Canyon Landfill in unincorporated Los Angeles County and the Azusa Land Reclamation in the City of Azusa. As discussed in Section 4.15.3.3, Sunshine Canyon Landfill and Azusa Land Reclamation Company Landfill have an estimated remaining capacity of approximately 77,900,000 cubic yards and 51,512,201 cubic yards, respectively. The addition of 158,496 cubic yards of soil and 7,743 cubic yards of demolition debris would represent less than 1 percent of the remaining capacity of these landfills and would not result in an exceedance of the remaining capacity or permitted daily intake of the Sunshine Canyon Landfill or Azusa Land Reclamation Company Landfill. The handling of all debris and waste generated during construction of the proposed project would be subject to the latest CALGreen Code requirements and California AB 939 requirements for salvaging, recycling, and reuse of materials from construction activity. Compliance with LAMC Section 66.32 would ensure at least 75 percent of the demolition and construction waste generated by future development would be diverted from landfills serving the city. Therefore, the generation of solid waste during construction of the Partial Preservation Alternative would not result in an exceedance of capacity of existing landfills.

For the reasons described above, construction of the Partial Preservation Alternative would result in less than significant direct and indirect impacts to utilities and service systems.

OPERATIONAL EFFECTS

Upon completion of construction activities, the water distribution system, sewer system, electric facilities, and natural gas connections serving the project site would be adequately sized to accommodate the proposed land uses. Occasional minor maintenance activities may be required to repair infrastructure as it ages. However, future relocation and expansion of these utilities during project operation are not anticipated, and operation of the Partial Preservation Alternative would not substantially disrupt utility services. Because existing telecommunication providers already provide services to the commercial and residential buildings in the project area, it is anticipated that existing telecommunications facilities would be sufficient to support the Partial Preservation Alternative's

needs for telecommunication services and project operation would not disrupt telecommunications services.

Operation of the Partial Preservation Alternative would result in increased water demand due to the net increase of 776 residential units, 45,000 sf of commercial retail uses, and 61,500 sf of Neighborhood Serving Uses on the project site. LADWP completed a Water Supply Assessment for operation of 1,600 residential units, 45,000 sf of commercial retail uses, and 85,000 sf of Neighborhood Serving Uses on the project site and determined that adequate water supplies would be available to meet the water demand of these uses along with the existing and planned future demands on LADWP, including during normal, single-dry, and multiple-dry water years (LADWP 2022). As the Partial Preservation Alternative would develop fewer residential units and less commercial retail and Neighborhood Serving Uses square footage on the project site than what was contemplated in the LADWP Water Supply Assessment for the Proposed Project Alternative, sufficient water supplies would be available to serve the Partial Preservation Alternative during its operation.

During operation, the Partial Preservation Alternative would increase wastewater flows and treatment demand for the project area. Wastewater generated by the Partial Preservation Alternative would be treated at the Terminal Island Water Reclamation Plant, which has a treatment capacity of 30 mgd, and currently treats approximately 15 mgd of wastewater on a dry weather day. The Partial Preservation Alternative's net wastewater generation rate would not exceed 15 mgd and therefore would not exceed the existing remaining capacity at Terminal Island Water Reclamation Plant. Therefore, the Partial Preservation Alternative's wastewater generation would not exceed the capacity of existing wastewater treatment facilities.

The Partial Preservation Alternative would increase electricity and natural gas demand on the project site due to increased buildout. The Partial Preservation Alternative would demand 11,547,559 kilowatt-hours of electricity and 2,651,240 cf of natural gas per year (Appendix B). As previously discussed, LADWP projects 26,654 gigawatt-hours of electricity sales in FY 2036-2037, and SoCalGas anticipates 4,857 million cubic feet per day of natural gas consumption in the year 2035 (LADWP 2017 and SoCalGas 2022). The Partial Preservation Alternative would represent less than 0.1 percent of LADWP's and SoCalGas's projected consumption. Therefore, the Partial Preservation Alternative's demand for electricity and natural gas would not exceed the capacity of existing electric and natural gas infrastructure.

Operation of the Partial Preservation Alternative is anticipated to result in approximately 5.0 tpd of solid waste generation (CalRecycle 2019). Landfills serving Los Angeles have a total remaining daily capacity of 25,640 tpd, and solid waste generated by the Partial Preservation Alternative would account for less than 1 percent of the remaining daily capacity of landfills serving Los Angeles. Therefore, the Partial Preservation Alternative would not generate solid waste in excess of the capacity of local infrastructure. In addition, the Partial Preservation Alternative would be consistent with the Statewide organic waste and recycling goals and requirements established by California AB 341, AB 939, AB 1826, and SB 1383 and the CALGreen Code, as well as local goals and policies for solid waste diversion outlined in the City's SWIRP, RENEW LA Plan, General Plan Framework Element, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, and Curbside Recycling Program.

As previously discussed, the project area is not in a flood hazard zone, and the Partial Preservation Alternative would not include features that would subject existing or proposed utilities to flood risk. The Partial Preservation Alternative would employ LID techniques and stormwater control measures outlined in LAMC Chapters 64.70 and 64.72 and the City's LID Handbook. With implementation of the

required LID BMPs, the runoff rates generated on the project site would not increase compared to current conditions and there would not be a substantial risk to utilities due to flood hazards.

In addition, as existing utilities infrastructure and service capacity are available to serve the Partial Preservation Alternative, this alternative would not be anticipated to induce an increase in the cost of utilities for consumers. For the reasons described above, operation of the Partial Preservation Alternative would result in less than significant direct and indirect impacts to utilities and service systems.

Cumulative Effects

Water Infrastructure and Supply

The geographic area to analyze cumulatively considerable impacts to water infrastructure and water supply includes the entire service territory of LADWP, which is the water supply provider for the project site. Cumulative projects would likely result in the need for new and/or upgraded water mains and pipelines through the LADWP service area. Cumulative projects would analyze potential environmental effects associated with the construction and relocation of associated water infrastructure as part of CEQA and NEPA compliance, as applicable. Any construction and relocation of water infrastructure would be coordinated with LADWP, which would minimize the potential for cumulative impacts related to service disruption. Therefore, cumulative development would not result in significant cumulative impacts associated with the construction/relocation of water facilities, and the project alternatives would result in less than significant cumulative impacts.

With regard to water supply, cumulative projects would be subject to the requirement of project-specific water supply assessments from LADWP prior to approval. LADWP's 2020 UWMP also includes a water shortage contingency plan and establishes response actions the City will implement in the event of a water supply shortage. The Metropolitan Water District of Southern California, from which LADWP purchases its imported State Water Project and Colorado River water supplies, is actively developing plans and making efforts to provide additional water supply reliability for the entire southern California region. Therefore, sufficient water supply would be available for cumulative development, and cumulative impacts to water supply would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

Wastewater Infrastructure and Capacity

The geographic area to analyze cumulatively considerable impacts to wastewater treatment includes the entire service territory of LASAN, which is the wastewater conveyance and treatment provider for the project site. Cumulative projects would also likely result in the need for new and/or upgraded sewer lines throughout the LASAN service area. Cumulative projects would analyze potential environmental effects associated with the construction and relocation of associated wastewater infrastructure as part of CEQA and NEPA compliance, as applicable. Any construction and relocation of wastewater infrastructure would be coordinated with LASAN, which would minimize the potential for cumulative impacts related to service disruption. Therefore, cumulative impacts associated with the construction/relocation of wastewater facilities would be less than significant, and the project alternatives' contributions would not be cumulatively considerable.

With regard to wastewater treatment capacity. The Terminal Island Water Reclamation Plant has a remaining capacity of 15 mgd which would be sufficient to serve the project alternatives. Furthermore, as indicated in the Requests for Wastewater Service Information letters provided by LASAN, the Terminal Island Water Reclamation Plant has sufficient capacity to accommodate the

Proposed Project Alternative, which would represent the greatest wastewater demand of the alternatives studied, in addition to LASAN's existing and projected commitments (LASAN 2022a and 2022b). Accordingly, cumulative development would not result in significant cumulative impacts related to wastewater generation, and the project alternatives would result in less than significant cumulative impacts.

Solid Waste

The geographic extent of analysis for cumulative impacts related to solid waste is Los Angeles County because the landfills open to the City of Los Angeles also serve the entire County. Cumulative development would result in an increase in solid waste generation during both construction and operation. As described in Section 4.15.3.4, the County continues to address landfill capacity through the preparation of Integrated Waste Management Plan annual reports. Because each annual report assesses a planning horizon of 15 years, should a shortage in solid waste disposal availability be identified during one of the annual assessments, sufficient time would be available to address the shortage. Therefore, cumulative development would not result in significant cumulative impacts related to solid waste generation, and the project alternatives would result in less than significant cumulative impacts.

Storm Drain Capacity and Flooding

Cumulative developments could introduce impervious surfaces which could increase runoff to enter the storm drain system and/or exacerbate flood conditions. As described in Section 4.7, cumulative development projects would be required to implement appropriate BMPs designed to retain and treat, at minimum, the first flush or the equivalent of the 85th percentile, 24-hour runoff event and first 0.75-inch of rainfall for any storm event. The City of Los Angeles Department of Public Works would review each future development project on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Therefore, cumulative development would not result in significant cumulative impacts related to storm drain capacity or flooding, and the project alternatives would result in less than significant cumulative impacts.

7.4.16 Socioeconomics

Socioeconomics is defined as the basic attributes and resources associated with the human environment, particularly population and economic activity. Human population is affected by regional birth and death rates, as well as net migration. Economic activity typically comprises employment, personal income, and industrial growth. Impacts on these two fundamental socioeconomic indicators (population and economic activity) can also influence other components such as housing availability and public services provision.

This section analyzes the potential impacts of the project alternatives to socioeconomic conditions in the project area. Impacts to socioeconomic resources, which include human population and economic activity, can be either direct or indirect. A direct impact would occur if a project alternative would directly change the existing socioeconomic conditions of the study area, such as by creating jobs or displacing persons or residential units. An indirect impact would occur if a project alternative would induce other changes that could affect local socioeconomic conditions. For example, an indirect impact would occur if a project alternative would lead to longer commute times for residents in the project area as a result of construction or operational activities associated with a project build alternative.

7.4.16.1 Affected Environment

This subsection describes the socioeconomic environment of the project area. The demographic and economic characteristics and trends are presented at the Census Tract level and compared to the city of Los Angeles, Los Angeles County, and the State of California. A Census Tract is a small, relatively permanent subdivision of a county that can be updated by local participants prior to each decennial census. Census tracts generally have a population size between 1,200 and 8,000 people and typically cover a contiguous area (United States Census Bureau [U.S. Census Bureau] 2023c). The OSP Specific Plan Site is located within Census Tract 2962.10 and the 327 Harbor Site is located within Census Tract 2962.20. Economic conditions are described by using the available statistics for income and poverty, labor force and industry, housing, and journey-to-work.

Demographic conditions are described based on available statistics for population, age, race and ethnicity. It is noted that the United States Office of Management and Budget requires federal agencies to use a minimum of two ethnicities in collecting and reporting data: (1) Hispanic or Latino and (2) Not Hispanic or Latino. The United States Office of Management and Budget defines “Hispanic or Latino” as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race (U.S. Census Bureau 2022). Within the group of people identifying as Not Hispanic or Latino, the U.S. Census Bureau further categorizes it into the following races: (1) White; (2) Black or African American; (3) American Indian and Alaska Native; (4) Asian; (5) Native Hawaiian and Other Pacific Islander; (6) Some Other Race; and (7) population of two or more races.

Population

Table 7-36 shows the overall demographic trends from the 2010 and 2020 decennial censuses in the United States at the State, County, city, and Census Tract levels. In 2010, a total of 37,253,956 people lived in the State of California, with 9,818,605 people within Los Angeles County and 3,792,621 people within the city of Los Angeles (U.S. Census Bureau 2023a). Between 2010 and 2020, the population of California increased by approximately 6.1 percent (to 39,538,223 people), the population of Los Angeles County increased by approximately 2.0 percent (to 10,014,009 people), and the population of the city of Los Angeles increased by approximately 2.8 percent (to 3,898,747 people) (U.S. Census Bureau 2023b). In 2020, the population within the two Census Tracts in which the project site is located was 7,425 people, which is an increase by 1.4 percent above the 2010 population (4,307 people).

Table 7-36 Population Trends from 2010 to 2020 at the State, County, City, and Census Tract Levels

Area	2010 Population	2020 Population	Percent Change
State of California	37,253,956	39,538,223	6.1%
Los Angeles County	9,818,605	10,014,009	2.0%
City of Los Angeles	3,792,621	3,898,747	2.8%
Census Tract 2962.10 ¹	3,019	2,976	-1.4%
Census Tract 2962.20 ²	4,307	4,449	3.3%

1 The OSP Specific Plan Site is located within Census Tract 2962.10.

2 The 327 Harbor Site is located within Census Tract 2962.20.

Sources: U.S. Census Bureau 2023a and 2023b

Race and Ethnicity

The percent of the total population by race and ethnicity at the State, County, city, and Census Tract levels in 2020, based on data from the 2020 decennial census, are presented in Table 7-37. People identifying as Hispanic or Latino compose the majority of the population within Census Tract 2962.10 (81.3 percent) and within Census Tract 2962.20 (58.9 percent), whereas in the State of California, Los Angeles County, and the city of Los Angeles, the majority of the population identifies as Not Hispanic or Latino. Within the group of people identifying as Not Hispanic or Latino, the majority identify as White within the State of California (34.7 percent), Los Angeles County (25.6 percent), the city of Los Angeles (28.9 percent), and Census Tract 2962.10 (7.8 percent), and as Black or African American within Census Tract 2962.20 (15.0 percent). Within Census Tract 2962.20, 11.9 percent of the population identify as White (U.S. Census Bureau 2023a).

Table 7-37 Distribution of Population by Race and Ethnicity at the State, County, City, and Census Tract Levels in 2020

Race/Ethnicity	State of California	Los Angeles County	City of Los Angeles	Census Tract 2962.10 ¹	Census Tract 2962.20 ²
Total Population	39,538,223 (100%)	10,014,009 (100%)	3,898,747 (100%)	2,976 (100%)	4,449 (100%)
Hispanic or Latino	15,579,652 (39.4%)	4,804,763 (48.0%)	1,829,991 (46.9%)	2,419 (81.3%)	2,622 (58.9%)
Not Hispanic or Latino	23,958,571 (60.6%)	5,209,246 (52.0%)	2,068,756 (53.1%)	557 (18.7%)	1,827 (41.1%)
Population of One Race	22,330,849 (56.5%)	4,896,193 (48.9%)	1,940,728 (49.8%)	506 (17.0%)	1,720 (38.7%)
<i>White alone</i>	13,714,587 (34.7%)	2,563,609 (25.6%)	1,126,052 (28.9%)	231 (7.8%)	530 (11.9%)
<i>Black or African American alone</i>	2,119,286 (5.4%)	760,689 (7.6%)	322,553 (8.3%)	211 (7.1%)	667 (15.0%)
<i>American Indian and Alaska Native alone</i>	156,085 (0.4%)	18,453 (0.2%)	6,614 (0.2%)	7 (0.2%)	10 (0.2%)
<i>Asian alone</i>	5,978,795 (15.1%)	1,474,237 (14.7%)	454,585 (11.7%)	40 (1.3%)	422 (9.5%)
<i>Native Hawaiian and Other Pacific Islander alone</i>	138,167 (0.3%)	20,522 (0.2%)	4,573 (0.1%)	7 (0.2%)	8 (0.2%)
<i>Some Other Race alone</i>	223,929 (0.6%)	58,683 (0.6%)	26,351 (0.7%)	10 (0.3%)	83 (1.9%)
Population of Two or More Races	1,627,722 (4.1%)	313,053 (3.1%)	128,028 (3.3%)	51 (1.7%)	107 (2.4%)

1 The OSP Specific Plan Site is located within Census Tract 2962.10.

2 The 327 Harbor Site is located within Census Tract 2962.20.

Note: Percentages have been rounded to the nearest one-tenth percent and, when combined, may not add up to exactly 100.0 percent.

Source: U.S. Census Bureau 2023a

Age Characteristics

Table 7-38 presents the percent of the total population by age range at the State, County, city, and Census Tract levels. Data presented in the table is based on the 2017-2021 American Community Survey five-year estimates, which is the latest available data²³. The majority of the population is between 18 and 64 years. The median age of the population at the State, County, city, and Census Tract levels range from 27.7 years in Census Tract 2962.10 to 39.6 years in Census Tract 2962.20. The median age within the State of California and Los Angeles County is 36.7 years, and the median age within the city of Los Angeles is 35.9 years (U.S. Census Bureau 2023d).

Table 7-38 Distribution of Population by Age at the State, County, City, and Census Tract Levels (2017-2021)

Age Category	State of California	Los Angeles County	City of Los Angeles	Census Tract 2962.10 ¹	Census Tract 2962.20 ²
Under 18 Years	8,956,641 (22.8%)	2,178,559 (21.7%)	809,449 (20.4%)	1,032 (28.3%)	772 (19.5%)
18-64 Years	24,744,885 (62.9%)	6,491,982 (64.7%)	2,653,042 (66.8%)	2,366 (64.8%)	2,427 (61.2%)
65 Years and Older	5,644,497 (14.3%)	1,370,141 (13.6%)	510,787 (12.9%)	254 (7.0%)	769 (19.4%)
Total Population	39,346,023 (100%)	10,040,682 (100%)	3,973,278 (100%)	3,652 (100%)	3,968 (100%)
Age Median	36.7	36.7	35.9	27.7	39.6

1 The OSP Specific Plan Site is located within Census Tract 2962.10.

2 The 327 Harbor Site is located within Census Tract 2962.20.

Note: Percentages have been rounded to the nearest one-tenth percent and, when combined, may not add up to exactly 100.0 percent.

Source: U.S. Census Bureau 2023d

Income and Poverty

Table 7-39 presents the median household annual income, per capita annual income, percentage of persons living below the poverty level at the State, County, city, and Census Tract levels. Data presented in the table is based on the 2017-2021 American Community Survey five-year estimates, which is the latest available data. The median household annual incomes in the State of California, Los Angeles County, and the city of Los Angeles were higher than in Census Tracts 2962.10 and 2962.20 (U.S. Census Bureau 2023e). The per capita annual incomes at the State, County, city, and Census Tract levels exhibit a similar pattern as illustrated for median household annual incomes (U.S. Census Bureau 2023f). The percentage of persons living below the poverty level was 12.3 percent in the State of California, 13.9 percent in Los Angeles County, and 16.6 percent in the city of Los Angeles. Census Tracts 2962.10 and 2962.20 had higher percentages of persons living below the poverty level (21.1 and 32.9 percent, respectively) than at the State, County, and city levels (U.S. Census Bureau 2023g).

²³ The five-year estimates from the American Community Survey are “period” estimates that represent data collected over a 60-month period. The primary advantage of using multi-year estimates is the increased statistical reliability of the data for less populated areas and small population subgroups (U.S. Census Bureau 2023e).

Table 7-39 Income and Poverty Information at the State, County, City, and Census Tract Levels (2017-2021)

Category	State of California	Los Angeles County	City of Los Angeles	Census Tract 2962.10 ¹	Census Tract 2962.20 ²
Median Household Annual Income (in 2021 Inflation-Adjusted Dollars)	\$84,097	\$76,367	\$69,778	\$48,085	\$34,894
Per Capita Annual Income (in 2021 Inflation-Adjusted Dollars)	\$41,276	\$37,924	\$39,378	\$16,282	\$27,000
Percentage of Persons Living Below Poverty Level	12.3%	13.9%	16.6%	21.1%	32.9%

1 The OSP Specific Plan Site is located within Census Tract 2962.10.

2 The 327 Harbor Site is located within Census Tract 2962.20.

Note: Percentages have been rounded to the nearest one-tenth percent and, when combined, may not add up to exactly 100.0 percent.

Source: U.S. Census Bureau 2023f, 2023g, and 2023h

Labor Force Characteristics

Table 7-40 presents the labor and employment status by percentage of the population 16 years and older at the State, County, city, and Census Tract levels. Data presented in the table is based on the 2017-2021 American Community Survey five-year estimates, which is the latest available data. As shown in the table, the majority (between 63.9 and 66.7 percent) of the population 16 years and older in the State of California, Los Angeles County, and the city of Los Angeles were in the labor force. Census Tract 2962.10 had a slightly higher percentage of the population 16 years and older in the labor force (67.4 percent) compared to the State, County, and city levels, whereas Census Tract 2962.20 had a substantially lower percent of the population 16 years and older in the labor force (47.9 percent). The unemployment rate ranged between 6.5 and 7.6 percent at the State, County, and city levels, whereas Census Tract 2962.10 had an unemployment rate of 10.3 percent and Census Tract 2962.20 had an unemployment rate of 5.3 percent (U.S. Census Bureau 2023i).

Table 7-40 Labor and Employment Status by Percentage at the State, County, City, and Census Tract Levels (2017-2021)

Category	State of California	Los Angeles County	City of Los Angeles	Census Tract 2962.10 ¹	Census Tract 2962.20 ²
Total Population (16 Years and Older)	31,499,704	8,101,041	3,199,202	2,811	3,319
In Labor Force	63.9%	64.9%	66.7%	67.4%	47.9%
Civilian Labor Force	63.4%	64.8%	66.6%	67.4%	45.3%
<i>Employed</i>	59.3%	60.3%	61.5%	60.4%	2.6%
<i>Unemployed</i>	4.1%	4.5%	5.1%	7.0%	0.4%
Armed Forces	0.5%	0.1%	0.0%	0.0%	47.9%
Unemployment Rate	6.5%	7.0%	7.6%	10.3%	5.3%

1 The OSP Specific Plan Site is located within Census Tract 2962.10.

2 The 327 Harbor Site is located within Census Tract 2962.20.

Note: Percentages have been rounded to the nearest one-tenth percent and, when combined, may not add up to exactly 100.0 percent.

Source: U.S. Census Bureau 2023i

Table 7-41 presents the distribution of the civilian employed population 16 years and older by industry at the State, County, city, and Census Tract levels. Data presented in the table is based on the 2017-2021 American Community Survey five-year estimates, which is the latest available data. Employment distribution by industry was examined to characterize the employment profile of the residents within the project area and surrounding region. As presented in the table, in the State of California, Los Angeles County, the city of Los Angeles, and Census Tract 2962.20, the “educational services, and health care and social assistance” industry employed the largest percentage of the workforce. In Census Tract 2962.20, the “retail trade” industry and the “arts, entertainment, and recreation, and accommodation and food services” industry employed the largest percentage of the workforce. The “agriculture, forestry, fishing and hunting, and mining” industry employed the least percentage of the workforce within the State, County, city, and Census Tracts (U.S. Census Bureau 2023i).

Table 7-41 Employment Distribution by Industry by Percentage at the State, County, City, and Census Tract Levels (2017-2021)

Industry	State of California	Los Angeles County	City of Los Angeles	Census Tract 2962.10 ¹	Census Tract 2962.20 ²
Civilian employed population 16 years and over	18,676,721	4,885,032	1,968,851	1,698	1,505
Agriculture, forestry, fishing and hunting, and mining	2.1%	0.5%	0.4%	0.0%	0.0%
Construction	6.6%	6.2%	6.4%	13.9%	4.8%
Manufacturing	9.0%	8.9%	7.3%	3.4%	9.5%
Wholesale trade	2.7%	3.2%	2.6%	3.5%	4.0%
Retail trade	10.3%	10.0%	9.7%	20.1%	15.9%
Transportation and warehousing, and utilities	5.7%	6.4%	5.1%	10.8%	10.8%
Information	2.9%	4.4%	6.3%	0.9%	0.5%
Finance and insurance, and real estate and rental and leasing	5.9%	6.0%	6.0%	1.5%	0.8%
Professional, scientific, and management, and administrative and waste management services	14.0%	13.3%	14.9%	6.5%	12.6%
Educational services, and health care and social assistance	21.4%	21.3%	20.0%	5.0%	25.5%
Arts, entertainment, and recreation, and accommodation and food services	9.8%	10.7%	12.3%	18.4%	8.2%
Other services, except public administration	5.0%	5.6%	6.3%	8.8%	5.8%
Public administration	4.6%	3.6%	2.6%	7.2%	1.6%

1 The OSP Specific Plan Site is located within Census Tract 2962.10.

2 The 327 Harbor Site is located within Census Tract 2962.20.

Note: Percentages have been rounded to the nearest one-tenth percent and, when combined, may not add up to exactly 100.0 percent.

Source: U.S. Census Bureau 2023i

Housing

Table 7-42 presents information related to housing at the State, County, city, and Census Tract levels. Data presented in the table is based on the 2017-2021 American Community Survey five-year estimates, which is the latest available data. The occupancy rate within the State of California, Los Angeles County, and the city of Los Angeles ranged between 92.1 and 93.4 percent. The occupancy rate within Census Tracts 2962.10 and 2962.20 was 99.1 and 96.9 percent, respectively. Additionally, the homeowner vacancy rate at the State, County, and city levels was 0.9 or 1.0 percent, and the homeowner vacancy rate within the two Census Tracts is less than 0.05 percent. The rental vacancy rate ranged between 3.9 and 4.7 percent at the State, County, and city levels, less than 0.05 percent within Census Tract 2962.10, and 1.5 percent within Census Tract 2962.20. Median home value was highest at the city level, followed by the County level, then the State level. Median gross monthly rent was highest at the State, County, and city levels and ranged from \$1,641 and \$1,698. Median home value and median gross monthly rent at the Census Tract level were substantially less than at the State, County, and city levels (U.S. Census Bureau 2023j).

Table 7-42 Housing Information at the State, County, City, and Census Tract Levels (2017-2021)

Category	State of California	Los Angeles County	City of Los Angeles	Census Tract 2962.10 ¹	Census Tract 2962.20 ²
Occupied Housing Units	13,217,586	3,342,811	1,384,851	1,128	1,779
Vacant Housing Units	1,110,953	235,990	119,064	10	56
Total Housing Units	14,328,539	3,578,801	1,503,915	1,138	1,835
Occupancy Rate	92.2%	93.4%	92.1%	99.1%	96.9%
Owner-Occupied Units	7,335,247	1,545,929	510,660	291	58
Renter-Occupied Units	5,882,339	1,796,882	874,191	837	1,721
Homeowner Vacancy Rate	1.0%	0.9%	1.0%	0.0%	0.0%
Rental Vacancy Rate	3.9%	4.0%	4.7%	0.0%	1.5%
Median Home Value of Owner-Occupied Units	\$573,200	\$647,000	\$705,900	\$566,300	\$380,600
Median Gross Rent (per month)	\$1,698	\$1,653	\$1,641	\$1,130	\$645

1 The OSP Specific Plan Site is located within Census Tract 2962.10.

2 The 327 Harbor Site is located within Census Tract 2962.20.

Note: Percentages have been rounded to the nearest one-tenth percent and, when combined, may not add up to exactly 100.0 percent.

Source: U.S. Census Bureau 2023j

Journey-to-Work

Table 7-43 presents information related to housing at the State, County, city, and Census Tract levels. Journey-to-work information presented in Table 7-43 shows the transportation mode used by residents to commute to work, whether residents work within the State and County. As shown in the table, driving a car, truck, or van alone was the most common means of transportation to work for persons living in the State of California, Los Angeles County, city of Los Angeles, and Census Tracts 2962.10 and 2962.20. Residents in Census Tract 2962.10 exhibited the highest percentage of persons driving alone to work (90.9 percent) compared to the other jurisdictions, which ranged between 74.1 and 79.9 percent. Residents in Census Tract 2962.20 utilized public transportation at a higher rate than the rest of the other jurisdictions at 10.4 percent.

A larger percentage of residents in the city of Los Angeles and Census Tracts 2962.10 and 2962.20 in-State and in-County (96.6 to 98.4 percent) compared to the State of California and Los Angeles County (83.9 and 92.8 percent, respectively). The majority of workers at the State, County, city, and Census Tract 2962.10 levels had two or more vehicles in their household, whereas the majority of workers at the Census Tract 2962.20 level had at least one vehicle in their household. The percentage of workers in Census Tracts 2962.10 and 2962.20 (9.3 and 14.6 percent, respectively) with no vehicles available in their households was substantially greater than at the State, County, and city levels (between 3.2 and 5.8 percent) (U.S. Census Bureau 2023k).

Table 7-43 Journey-to-Work Information at the State, County, City, and Census Tract Levels (2017-2021)

Category	State of California	Los Angeles County	City of Los Angeles	Census Tract 2962.10 ¹	Census Tract 2962.20 ²
Means of Transportation to Work					
Car, Truck, or Van	79.7%	79.3%	74.1%	90.9%	79.9%
Drove Alone	70.1%	70.0%	65.2%	73.4%	69.8%
Carpooled	9.6%	9.3%	8.9%	17.4%	10.2%
<i>In 2-Person Carpool</i>	7.0%	6.9%	6.8%	15.9%	6.1%
<i>In 3-Person Carpool</i>	1.5%	1.4%	1.3%	1.6%	4.1%
<i>In 4-or-More Person Carpool</i>	1.1%	0.9%	0.8%	0.0%	0.0%
Public Transportation (excluding taxicab)	4.1%	4.9%	7.7%	5.5%	10.4%
Walked	2.4%	2.4%	3.2%	1.4%	3.9%
Bicycle	0.8%	0.6%	0.7%	0.0%	2.1%
Taxicab, motorcycle, or other means	1.6%	1.8%	1.9%	0.0%	0.0%
Worked at Home	11.4%	10.9%	12.4%	2.3%	3.7%
Place of Work					
Worked in State of Residence	99.6%	99.6%	99.6%	100.0%	98.3%
Worked in County of Residence	83.5%	92.8%	96.6%	98.4%	97.5%
Worked Outside County of Residence	16.0%	6.8%	3.0%	1.6%	0.8%
Worked outside State of Residence	0.4%	0.4%	0.4%	0.0%	1.7%
Vehicles Available					
No Vehicle Available	3.2%	3.9%	5.8%	9.3%	14.6%
1 Vehicle Available	18.0%	21.3%	26.9%	19.8%	39.9%
2 Vehicles Available	37.5%	37.0%	37.2%	26.5%	34.2%
3 or More Vehicles Available	41.2%	37.8%	30.1%	44.5%	11.3%

1 The OSP Specific Plan Site is located within Census Tract 2962.10.

2 The 327 Harbor Site is located within Census Tract 2962.20.

Note: Percentages have been rounded to the nearest one-tenth percent and, when combined, may not add up to exactly 100.0 percent.

Source: U.S. Census Bureau 2023k

Regulatory Setting

NEPA requires consideration of socioeconomics in NEPA analysis. Specifically, Section 102(A) of NEPA requires federal agencies to “ensure the integrated use of the natural and social sciences...in planning and in decision making” (42 USC Section 4332[A]).

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to socioeconomics are provided in Table 7-44.

Table 7-44 Socioeconomics Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	- Would not result in isolation or displacement of residents - Would not result in isolation, displacement, demolition, acquisition, or other adverse change to housing units and local businesses - Would not create or displace jobs
	Indirect Effect	- Would not change property values, rental fees, and/or vacancy rates - Would not change journey-to-work methods/commute times
	Applies to All Effect Types	- No discernable changes to the socioeconomic conditions in the region or locality - Would alter socioeconomic conditions for only an indiscernible or negligible period of time
Less Than Significant	Direct Effect	- Would result in only temporary isolation and/or displacement of residents - Would result in only temporary isolation and/or displacement of housing units and/or local businesses - Would result in only temporary changes in employment levels
	Indirect Effect	- Would result in only temporary changes in property values, rental fees, and/or vacancy rates - Would result in only temporary changes in journey-to-work methods/commute times
	Applies to All Effect Types	- Socioeconomic conditions would be altered for only a short, finite period - Impacts would be localized in specific areas and would not substantially affect socioeconomic conditions or resources
Potentially Significant	Direct Effect	- Would result in isolation and/or displacement of residents; physical barriers or limited access would insulate neighborhoods or population groups - Would result in isolation, displacement, demolition, and/or acquisition of housing units and/or local businesses - Would adversely change access to a business and/or a business' customer service area - Would result in loss of jobs and employment opportunities
	Indirect Effect	- Would adversely change property values, rental fees, and/or vacancy rates - Would change journey-to-work methods/commute times of residents over the long-term
	Applies to All Effect Types	- Would result in adverse socioeconomic impacts observed in the project area - Would permanently adversely alter socioeconomic conditions in the project area

Impact Level	Type of Effect	Impact Description
Beneficial	Direct Effect	- Would increase the number of housing units in an area with low vacancy rates - Would create jobs/increase employment levels - Would increase property values - Would improve vehicular, transit, and/or pedestrian connections in the project area
	Indirect Effect	Would provide an increased sense of social connectedness and/or maintain a sense of connection to the community; increased sense of identity or feeling of pride in the community
	Applies to All Effect Types	- Would result in socioeconomic benefits observed throughout the project area - Would result in long-term beneficial alterations to socioeconomic conditions in the project area

Each of the project alternatives was evaluated to determine its potential to cause changes to the existing socioeconomic conditions in the project area. The principal issue of concern to socioeconomic resources is whether an alternative would result in potentially significant demographic, economic, or social impacts and/or adversely affect the community character of the project area.

The potential direct and indirect impacts associated with any proposed displacement of persons and housing units were analyzed. U.S. Census Bureau data were used to better understand the demographic characteristics of potentially displaced people.

Economic impacts were determined in terms of jobs and earnings that would result from spending associated with the project. An example of a direct effect is the hiring of employees to construct the project, while an indirect impact is a change in earnings or jobs for industries that supply goods and services to the construction industry. Additionally, an induced effect would come from the spending of household earnings by construction workers, other employees working directly on the project, and employees working for the vendor firms.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve ground-disturbing construction activities or change the existing uses or population of the project site, and therefore, no residents, housing units, or local businesses would be isolated or displaced and no jobs would be created or displaced. The No Project Alternative also would not result in a change in property values, rental fees, or vacancy rates, nor would it change work commute methods or times. Therefore, the No Project Alternative would result in no direct or indirect socioeconomics impact.

Proposed Project Alternative

CONSTRUCTION EFFECTS

During construction of the Proposed Project Alternative, existing residents and housing units at Rancho San Pedro would be temporarily relocated. As a built-out community without vacant parcels to develop initial phases upon, the development phasing strategy for the OSP Specific Plan Site would necessitate some relocation for current Rancho San Pedro residents during the initial stages of

construction. When residents must be relocated, HACLA would adhere to all requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Resident relocation would be guided by the One San Pedro Relocation Plan. For additional information regarding the One San Pedro Relocation Plan, the reader is referred to Section 2.5.5, *Relocation Plan*. Because displacement would be temporary in nature, construction of the Proposed Project Alternative would result in less than significant direct socioeconomics impacts related to displacement of residents and housing units.

Because no businesses are currently located on the project site, the Proposed Project Alternative would result in no direct socioeconomics impact related to local businesses or jobs.

Lane closures and increased traffic due to construction activities associated with the Proposed Project Alternative could temporarily affect travel times of local residents commuting to work. However, travel would be maintained on all streets around the project site throughout the construction period. In addition, a Construction Management Plan developed in coordination with LADOT would be implemented during construction pursuant to PDF T-1 to ensure that adequate and safe access remains available within and near the project site. The Proposed Project Alternative would employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure traffic flow is maintained in the project area. As such, construction of the Proposed Project Alternative would temporarily increase worker commute times. Therefore, construction of the Proposed Project Alternative would result in less than significant indirect socioeconomics impacts related to worker commute times.

As discussed in Section 4.10.3, construction activities would create short-term employment opportunities in the construction industry, which could indirectly increase the population and demand for housing in the vicinity of the project site. However, the employment patterns of construction workers in southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Proposed Project Alternative. The construction industry differs from most other employment industries in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

There were an estimated 297,145 workers the construction industry in Los Angeles County in 2021, which is the latest available data (U.S. Census Bureau 2023I). Given that the current unemployment rate in Los Angeles County was 7.0 percent in 2017-2021 (U.S. Census Bureau 2023i), it is likely that several thousand construction workers would be available, and it is expected that the skilled workers anticipated to construct the Proposed Project Alternative already reside within the region. Therefore, construction associated with the Proposed Project Alternative would not cause temporary or permanent population growth or accelerate the demand for housing units in the project area. The creation of temporary construction jobs associated with the Proposed Project Alternative would result in direct and indirect beneficial impacts related to socioeconomics.

In summary, construction of the Proposed Project Alternative would result in overall beneficial direct and indirect socioeconomics impacts.

OPERATIONAL EFFECTS

After buildout of the Proposed Project Alternative, there would be a net increase of up to 1,122 residential units on the project site, which would accommodate approximately 2,715 new residents. The Proposed Project Alternative would also include 45,000 sf of new commercial uses and 85,000 sf of new Neighborhood Serving Uses, which would result in approximately 314 new jobs on the project site. The Proposed Project Alternative would include improvements to existing roadways, alternative transportation facilities, recreational facilities, and utilities in the project area. Additionally, project site security and accessibility would be enhanced. Replacement of the existing, aging affordable housing units on the OSP Specific Plan Site with modernized affordable and moderate housing units would increase property values. Therefore, operation of the Proposed Project Alternative would result in beneficial direct socioeconomics impacts.

The Proposed Project Alternative would include building designs that integrate into the surrounding neighborhoods, take advantage of waterfront views, and integrate new amenities with a focus on developing an active, healthy community. Therefore, buildout of the Proposed Project Alternative would provide an increased sense of social connectedness and an increased sense of identity or feeling of pride in the San Pedro CPA, and indirect socioeconomics impacts would be beneficial.

In summary, operation of the Proposed Project Alternative would result in overall beneficial direct and indirect socioeconomics impacts.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

During construction of the Historic Rehabilitation Alternative, existing residents and housing units at Rancho San Pedro would be temporarily relocated. During rehabilitation of the existing buildings on the OSP Specific Plan Site, resident relocation would be required. Rehabilitation of the existing buildings would occur in phases to minimize resident relocation to the extent feasible. All residents in good standing would be offered a choice of housing including the ability to return to their rehabilitated onsite unit, a tenant-based housing choice voucher, or a public housing unit at another HACLA community. In addition, the 47 residential units on the 327 Harbor Site would provide replacement housing for some of the current residents on the OSP Specific Plan Site, if residents elect to relocate to the 327 Harbor Site. When residents must be relocated, HACLA would adhere to all requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Because displacement would be temporary in nature, construction of the Historic Rehabilitation Alternative would result in less than significant direct socioeconomics impacts related to displacement of residents and housing units.

Because no businesses are currently located on the project site, the Historic Rehabilitation Alternative would result in no direct socioeconomics impact related to local businesses or jobs.

Rehabilitation activities associated with the Historic Rehabilitation Alternative would require substantially fewer construction workers and less construction materials to be delivered to the project site than if new construction were to occur. Travel would be maintained on all streets around the project site throughout the construction period of the Historic Rehabilitation Alternative. In addition, the Historic Rehabilitation Alternative would include PDF T-1 for construction activities at the 327

Harbor Site, which would reduce the potential for traffic-related conflicts. PDF T-1 would not be applicable to rehabilitation activities on the OSP Specific Plan Site under the Historic Rehabilitation Alternative due to the substantial reduction in the number of construction workers and construction-related deliveries necessary for construction on the OSP Specific Plan Site. As such, construction of the Proposed Project Alternative could temporarily increase worker commute times. Therefore, construction of the Historic Rehabilitation Alternative would result in less than significant indirect socioeconomics impacts related to worker commute times.

As discussed in Section 4.10.3, rehabilitation activities would create short-term employment opportunities in the construction industry, which could indirectly increase the population and demand for housing in the vicinity of the project site. However, the employment patterns of construction workers in southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Historic Rehabilitation Alternative. Therefore, rehabilitation associated with the Historic Rehabilitation Alternative would not cause temporary or permanent population growth or accelerate the demand for housing units in the project area. The creation of temporary construction jobs related to the Historic Rehabilitation Alternative would result in direct and indirect beneficial socioeconomics impacts.

OPERATIONAL EFFECTS

Operation of the Historic Rehabilitation Alternative would not create new jobs as no commercial uses would be developed. This alternative also would not change worker commute methods or times. As discussed in Section 6.5.2, after buildout of the Historic Rehabilitation Alternative, there would be a net increase of 47 residential units on the project site, which would accommodate approximately 114 new residents. Rehabilitation of the existing, aging affordable housing units on the OSP Specific Plan Site would increase property values. Therefore, operation of the Proposed Project Alternative would result in beneficial direct socioeconomics impacts related to housing in the project area.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

During construction and rehabilitation activities under the Partial Preservation Alternative, existing residents and housing units at Rancho San Pedro would be temporarily relocated. As a built-out community without vacant parcels to develop initial phases upon, the development phasing strategy for the OSP Specific Plan Site would necessitate some relocation for current Rancho San Pedro residents during the initial stages of construction. When residents must be relocated, HACLA would adhere to all requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The One San Pedro Relocation Plan would guide resident relocation. Because displacement would be temporary in nature, construction of the Partial Preservation Alternative would result in less than significant direct socioeconomics impacts related to displacement of residents and housing units.

Because no businesses are currently located on the project site, the Partial Preservation Alternative would result in no direct socioeconomics impact on local businesses or jobs.

Lane closures and increased traffic due to construction activities associated with the Partial Preservation Alternative could temporarily affect travel times of local residents commuting to work. However, travel would be maintained on all streets around the project site throughout the construction period. In addition, a Construction Management Plan developed in coordination with

LADOT would be implemented during construction pursuant to PDF T-1 to ensure that adequate and safe access remains available within and near the project site. The Partial Preservation Alternative would employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure traffic flow is maintained in the project area. As such, construction of the Partial Preservation Alternative would temporarily increase worker commute times. Therefore, construction of the Partial Preservation Alternative would result in less than significant indirect socioeconomics impacts to worker commute times.

As discussed in Section 4.10.3, construction activities would create short-term employment opportunities in the construction industry, which could indirectly increase the population and demand for housing in the vicinity of the project site; however, the employment patterns of construction workers in southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Partial Preservation Alternative because it is expected that the skilled workers anticipated to construct this alternative already reside within the region. Therefore, construction associated with the Partial Preservation Alternative would not cause temporary or permanent population growth or accelerate the demand for housing units in the project area. The creation of temporary construction jobs related to the Partial Preservation Alternative would result in direct and indirect beneficial socioeconomics impacts.

OPERATIONAL EFFECTS

As discussed in Section 6.6.2, after buildout of the Partial Preservation Alternative, there would be a net increase of 729 residential units on the project site, which would accommodate approximately 1,878 new residents. The Partial Preservation Alternative would also provide 45,000 sf of commercial retail uses and 61,500 sf of Neighborhood Serving Uses, which would result in approximately 267 new jobs on the project site. The Partial Preservation Alternative would include improvements to existing roadways, alternative transportation facilities, recreational facilities, and utilities in the project area. Additionally, project site security and accessibility would be enhanced. Replacement of a portion of the existing, aging affordable housing units on the OSP Specific Plan Site with modernized affordable and moderate housing units, as well as rehabilitation of the remaining housing units of Rancho San Pedro, would increase property values. Therefore, operation of the Partial Preservation Alternative would result in beneficial direct impacts related to socioeconomics.

The Partial Preservation Alternative would include new building designs that integrate into the surrounding neighborhoods, take advantage of waterfront views, and integrate new amenities with a focus on developing an active, healthy community. Therefore, buildout of the Partial Preservation Alternative would provide an increased sense of social connectedness and an increased sense of identity or feeling of pride in the San Pedro CPA, and indirect impacts related to socioeconomics would be beneficial.

Cumulative Effects

As discussed in Section 3.4, *Cumulative Development*, there are 12 additional projects considered in the cumulative impact analysis. The cumulative projects consist of infill development, including apartments, mixed-use, retail, office, and hotel uses, within urbanized areas of San Pedro containing similar existing uses. If construction of any of the project build alternatives occurs concurrently with the construction of cumulative projects in proximity to the project site, specific coordination among

these multiple construction sites would be required and implemented through the project build alternatives' construction management plan (as required by PDF T-1), which would ensure that traffic flow are maintained on adjacent rights-of-way and that construction activities would not disrupt nearby public service facilities. As such, construction of the cumulative projects would temporarily increase worker commute times, which would result in a less than significant cumulative socioeconomics impact, and the project alternatives' contributions would not be cumulatively considerable.

Similar to the project build alternatives, construction associated with the cumulative projects would not cause temporary or permanent population growth or accelerate the demand for housing units in the project area. The creation of temporary construction jobs associated with the cumulative projects would result in beneficial cumulative socioeconomics impacts, and the project alternatives' contributions would not be cumulatively considerable.

After construction of the cumulative projects, there would be a net increase in housing units and commercial uses, which would accommodate new residents and new employees in the project area. Modernization of existing, aging infill development and added community amenities associated with the cumulative projects, such as improvements to existing roadways, pedestrian and bicycle facilities, recreational facilities, and utilities, would increase property values in the San Pedro CPA. Furthermore, buildout of the cumulative projects would provide an increased sense of social connectedness and an increased sense of identity or feeling of pride in the San Pedro CPA. Therefore, operation of the cumulative projects would result in beneficial cumulative socioeconomics impacts, and the project alternatives' contributions would not be cumulatively considerable.

7.4.17 Environmental Justice

This section analyzes the potential impacts of the project alternatives on environmental justice concerns in the project area. Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, disability, or income, including tribal persons, with respect to both positive and negative environmental and human health impacts of a project (HUD 2023c). An example of a direct impact would be the displacement of residents, residential units, and businesses that disproportionately affect minority and/or low-income populations. An example of an indirect impact would be changes in property values, rental fees, and/or vacancy rates that disproportionately affect environmental justice communities.

7.4.17.1 Affected Environment

As previously stated, the OSP Specific Plan Site is located within Census Tract 2962.10 and the 327 Harbor Site is located within Census Tract 2962.20. In this EIS, a "low-income population" is determined to be present in the project area (i.e., Census Tracts 2962.10 and 2962.20) if the percentage of persons living below the poverty level in the project area is greater than the percentage of persons living below the poverty level at the State, County, and/or city levels. The term "minority population" is subjective in that there is no set quantitative definition by the federal agencies. In this EIS, similar to a low-income population, a minority population is present if the percentage of persons identifying as a race/ethnicity other than White (Not Hispanic or Latino) in Census Tracts 2962.10 and 2962.20 is greater than the percentage of persons identifying as a race/ethnicity other than White (Not Hispanic or Latino) at the State, County, and/or city levels.

The reader is referred to the “Affected Environment” section under Section 7.4.17, *Socioeconomics*, for information regarding the race and ethnicity characteristics and income and the percentage of persons living below the poverty level at the State, County, city, and Census Tract levels.

As shown in Table 7-37, the project site is located in census tracts where the majority of the population (88.1 to 92.2 percent) identifies as a race/ethnicity other than White (Not Hispanic or Latino). The majority of the population at the State, County, and city levels (65.3, 74.4, and 71.1 percent, respectively) also identifies as a race/ethnicity other than White (Not Hispanic or Latino) (U.S. Census Bureau 2023h). Because the percentages of persons identifying a race/ethnicity other than White (Not Hispanic or Latino) at the Census Tract level is greater than at the State, County, and city levels, a minority population is present in the project area.

As shown in Table 7-39, the percentages of persons living below the poverty level in Census Tracts 2962.10 and 2962.20 are 21.1 and 32.9 percent, respectively, whereas the percentages of persons living below the poverty level at the State, County, and city level are less at 12.3, 13.9, and 16.6 percent (U.S. Census Bureau 2023h). Because the percentages of persons living below the poverty level at the Census Tract level is greater than at the State, County, and city levels, a low-income population is present in the project area.

Regulatory Setting

The following laws and regulations applicable to environmental justice are discussed in Section 4.10, *Population and Housing*:

- Comprehensive Housing Affordability Study
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

A discussion of additional regulations related to environmental justice is provided below:

Title VI of the Civil Rights Act of 1964

Title VI, 42 U.S.C. Section 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Executive Order 12898

On February 11, 1994, the President issued Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The Order requires all federal and state agencies receiving federal funds to identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. According to the Council on Environmental Quality (CEQ), a minority population occurs when American Indian, Alaskan Native, Asian, Pacific Islander, Black, or population of the affected area exceeds 50 percent, or the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population. Likewise, a low-income population occurs where the percentage of low-income persons is at least 50 percent of the total population or is meaningfully greater than the low-income population percentage in the general population (CEQ 1997).

Thresholds of Significance and Methodology

The significance criteria used to evaluate potential direct and indirect effects related to environmental justice are provided in Table 7-45.

Table 7-45 Environmental Justice Impact Significance Criteria

Impact Level	Type of Effect	Impact Description
No Impact	Direct Effect	- Would not result in disproportionately high and adverse human health/environmental effects (e.g., from air, noise, and water pollution) borne predominately by low-income and/or minority populations - Would not result in destruction or disruption of community cohesion or access to available facilities and services - Would not result in displacement of residents, housing units, and/or local businesses - Would not create or displace jobs
	Indirect Effect	- Would not result in changes in property values, rental fees, and/or vacancy rates - Would not induce changes to demographic composition
	Applies to All Effect Types	- Would not result in discernable changes to environmental justice concerns in the region or locality - Would alter environmental justice conditions for only an indiscernible or negligible period of time
Less Than Significant	Direct Effect	- Would result in only temporary changes to community cohesion or access to available facilities and services (public and private) - Would result in only temporary displacement of residents, housing units, and/or local businesses - Would result in only temporary changes in employment levels
	Indirect Effect	- Would result in only temporary changes in property values, rental fees, and/or vacancy rates - Would result in only temporary changes to demographic composition
	Applies to All Effect Types	- Environmental justice conditions would be altered for only a short, finite period - Impacts would be localized in specific areas and not substantially affect environmental justice conditions
Potentially Significant	Direct Effect	- Would result in disproportionately high and adverse human health/environmental effects borne predominately by low-income and/or minority populations, such as noise, dust, and traffic pollution from construction or operational activities - Would result in loss of community cohesion, or access to available facilities and services (public and private) - Would displace residents, housing units, and/or local businesses; would place physical barriers or provide limited access that insulates neighborhoods or population groups - Would result in loss of jobs or employment opportunities
	Indirect Effect	- Would result in adverse changes in property values, rental fees, and/or vacancy rates - Would result in long-term changes to demographic composition
	Applies to All Effect Types	Would result in adverse environmental justice impacts observed throughout affected community

Impact Level	Type of Effect	Impact Description
Beneficial	Direct Effect	Would permanently adversely alter environmental justice conditions on the project site
		- Would result in disproportionately high and beneficial human health/environmental effects borne predominately by low-income and/or minority populations (e.g., improved water quality or increased flood protection) - Would improve and strengthen community cohesion or access to available facilities and services, including emergency services - Would increase jobs and employment opportunities
		- Would increase property values - Would include full and fair participation by environmental justice communities in the decision-making process, and/or would prevent the denial of, reduction in, or substantial delay in the receipt of benefits by low-income and/or minority populations
	Applies to All Effect Types	- Would result in environmental justice benefits observed throughout affected community - Would result in long-term beneficial alterations in environmental justice conditions in the project area

HUD's guidance for assessing significant impacts related to environmental justice is to consider:

1. Does the project create adverse environmental or human health impacts?
2. If so, are these adverse environmental or human health impacts disproportionately high for low-income and/or minority communities?

The Federal Interagency Working Group on Environmental Justice and NEPA Committee published a report in March 2016, entitled *Promising Practices for EJ Methodologies in NEPA Reviews*, which compiles best practices for including robust environmental justice consideration into environmental reviews. The report emphasizes the importance of meaningful engagement efforts, finding these efforts are most effective when initiated early and conducted, as appropriate, throughout each step of the environmental review process. The report also describes guiding principles and specific steps which can be utilized to assess environmental justice.

Environmental Consequences

No Project Alternative

CONSTRUCTION AND OPERATIONAL EFFECTS

The No Project Alternative would not involve ground-disturbing construction activities or change the existing uses or population of the project site, and therefore, no residents, housing units, or local businesses would be displaced and no jobs would be created or displaced. The No Project Alternative also would not result in a change in property values, rental fees, or vacancy rates, nor would it induce change to the demographic composition of the project site or vicinity or change work commute methods or times. Therefore, the No Project Alternative would result in no direct or indirect environmental justice impact.

Proposed Project Alternative

CONSTRUCTION EFFECTS

As previously discussed, minority and low-income populations are present in the project area (in Census Tracts 2962.10 and 2962.20). As discussed in Section 7.4.17, *Socioeconomics*, during construction of the Proposed Project Alternative, existing residents and housing units at Rancho San Pedro would be temporarily relocated. Resident relocation would be guided by the One San Pedro Relocation Plan. Because displacement would be temporary in nature, construction of the Proposed Project Alternative would result in less than significant direct environmental justice impacts related to displacement of residents and housing units.

Because no businesses are currently located on the project site, the Proposed Project Alternative would result in no direct environmental justice impact on local businesses or jobs.

During construction of the Proposed Project Alternative, the project site and vicinity would experience temporary construction-related human health/environmental effects, such as increased dust, diesel exhaust, and noise; however, such effects would be similar to those of other similarly-sized construction projects. Therefore, construction of the Proposed Project Alternative would not result in disproportionately high and adverse human health/environmental effects borne predominately by low-income and/or minority populations. As such, the Proposed Project Alternative would result in no direct construction-related environmental justice impact.

As discussed in Section 7.4.17, construction activities would create short-term employment opportunities in the construction industry; however, construction workers in southern California are such that it is not likely that they would relocate their households to work on the Historic Rehabilitation Alternative. Therefore, construction associated with the Proposed Project Alternative would not cause temporary or permanent population growth, accelerate the demand for housing units, or induce changes to the demographic composition in the project area. The creation of temporary construction jobs related to the Proposed Project Alternative would result in direct and indirect beneficial environmental justice impacts.

OPERATIONAL EFFECTS

As discussed in Section 7.4.17, after buildout of the Proposed Project Alternative, there would be a net increase of up to 1,122 residential units on the project site, which would accommodate approximately 2,715 new residents. The Proposed Project Alternative would also include 45,000 sf of new commercial uses and 85,000 sf of new Neighborhood Serving Uses, which would result in approximately 314 new jobs on the project site. The Proposed Project Alternative would include improvements to existing roadways, alternative transportation facilities, recreational facilities, and utilities in the project area. Additionally, project site security and accessibility would be enhanced. Replacement of the existing, aging affordable housing units on the OSP Specific Plan Site with modernized affordable and moderate housing units would increase property values. Therefore, operation of the Proposed Project Alternative would result in beneficial direct and indirect environmental justice impacts.

The Proposed Project Alternative would include building designs that integrate into the surrounding neighborhoods, take advantage of waterfront views, and integrate new amenities with a focus on developing an active, healthy community. Therefore, buildout of the Proposed Project Alternative would provide an increased sense of social connectedness and an increased sense of identity or feeling of pride in the San Pedro CPA, and indirect environmental justice impacts would be beneficial.

As discussed in Section 7.2.8, *Public Participation*, scoping for the project involved public noticing and virtual public scoping meetings to invite the public, including residents of the project site and surrounding area, which is an environmental justice community. During the public scoping period and scoping meetings for the project, community residents and other members of the public could provide comments on the design of the project and the scope of environmental analysis in this EIR/EIS. The NEPA and CEQA compliance processes allow for additional opportunities to comment on the project and this EIR/EIS, as described in Section 7.2.8. Therefore, the Proposed Project Alternative would include full and fair participation by environmental justice communities in the decision-making process, and would prevent the denial of, reduction in, or substantial delay in the receipt of benefits by low-income and minority populations. This would be an indirect beneficial environmental justice impact.

Historic Rehabilitation Alternative

CONSTRUCTION EFFECTS

As previously discussed, minority and low-income populations are present in the project area (in Census Tracts 2962.10 and 2962.20). As discussed in Section 7.4.17, *Socioeconomics*, during construction of the Historic Rehabilitation Alternative, existing residents and housing units at Rancho San Pedro would be temporarily relocated. Because displacement would be temporary in nature and residents would have the option to return to their rehabilitated units, construction of the Historic Rehabilitation Alternative would result in less than significant direct environmental justice impacts related to displacement of residents and housing units.

Because no businesses are currently located on the project site, the Historic Rehabilitation Alternative would result in no direct environmental justice impact on local businesses or jobs.

During rehabilitation activities associated with the Historic Rehabilitation Alternative, the OSP Specific Plan Site would experience temporary rehabilitation-related human health/environmental effects, such as increased dust and noise; however, such effects would be similar to those of other building rehabilitation projects. Therefore, rehabilitation activities under this alternative would not result in disproportionately high and adverse human health/environmental effects borne predominately by low-income and/or minority populations. As such, the Historic Rehabilitation Alternative would result in no direct construction-related environmental justice impact.

As discussed in Section 7.4.17, rehabilitation activities would create short-term employment opportunities in the construction industry; however, construction workers in southern California are such that it is not likely that they would relocate their households to work on the Historic Rehabilitation Alternative. Therefore, rehabilitation activities under the Historic Rehabilitation Alternative would not cause temporary or permanent population growth, accelerate the demand for housing units, or induce changes to the demographic composition in the project area. The creation of temporary construction jobs related to the Historic Rehabilitation Alternative would result in direct and indirect beneficial environmental justice impacts.

OPERATIONAL EFFECTS

As discussed in Section 7.4.17, operation of the Historic Rehabilitation Alternative would not create new jobs as no commercial uses would be developed. After buildout of the Historic Rehabilitation Alternative, there would be a net increase of 47 residential units on the project site, which would accommodate approximately 114 new residents. Rehabilitation of the existing, aging affordable housing units on the OSP Specific Plan Site would increase property values. Therefore, operation of

the Historic Rehabilitation Alternative would result in beneficial direct and indirect environmental justice impacts.

As discussed in Section 7.2.8, *Public Participation*, scoping for the project involved public noticing and virtual public scoping meetings to invite the public, including residents of the project site and surrounding area, which is an environmental justice community. During the public scoping period and scoping meetings for the project, community residents and other members of the public could provide comments on the design of the project and the scope of environmental analysis in this EIR/EIS. The NEPA and CEQA compliance processes allow for additional opportunities to comment on the project and this EIR/EIS, as described in Section 7.2.8. Therefore, the Historic Rehabilitation Alternative would include full and fair participation by environmental justice communities in the decision-making process, and would prevent the denial of, reduction in, or substantial delay in the receipt of benefits by low-income and minority populations. This would be an indirect beneficial environmental justice impact.

Partial Preservation Alternative

CONSTRUCTION EFFECTS

As previously discussed, minority and low-income populations are present in the project area (in Census Tracts 2962.10 and 2962.20). As discussed in Section 7.4.17, *Socioeconomics*, during construction of the Partial Preservation Alternative, existing residents and housing units at Rancho San Pedro would be temporarily displaced and relocated. The One San Pedro Relocation Plan would guide resident relocation. Because displacement would be temporary in nature, construction of the Partial Preservation Alternative would result in less than significant direct environmental justice impacts related to displacement of residents and housing units.

Because no businesses are currently located on the project site, the Partial Preservation Alternative would result in no direct environmental justice impact on local businesses or jobs.

During construction and rehabilitation activities under the Partial Preservation Alternative, the project site and vicinity would experience temporary construction-related human health/environmental effects, such as increased dust, diesel exhaust, and noise; however, such effects would be similar to those of other similarly-sized construction projects. Therefore, construction of the Partial Preservation Alternative would not result in disproportionately high and adverse human health/environmental effects borne predominately by low-income and/or minority populations. As such, the Partial Preservation Alternative would result in no direct construction-related environmental justice impact.

As discussed in Section 7.4.17, construction and rehabilitation activities would create short-term employment opportunities in the construction industry; however, construction workers in southern California are such that it is not likely that they would relocate their households to work on the Partial Preservation Alternative. Therefore, construction associated with the Partial Preservation Alternative would not cause temporary or permanent population growth, accelerate the demand for housing units, or induce changes to the demographic composition in the project area. The creation of temporary construction jobs related to the Partial Preservation Alternative would result in direct and indirect beneficial environmental justice impacts.

OPERATIONAL EFFECTS

As discussed in Section 7.4.17, after buildout of the Partial Preservation Alternative, there would be a net increase of up to 729 residential units on the project site, which would accommodate approximately 1,878 new residents. The Partial Preservation Alternative would also include 45,000 sf of commercial retail uses and 61,500 sf of Neighborhood Serving Uses, which would result in approximately 267 new jobs on the project site. The Partial Preservation Alternative would include improvements to existing roadways, alternative transportation facilities, recreational facilities, and utilities in the project area. Additionally, project site security and accessibility would be enhanced. Replacement of the existing, aging affordable housing units on the OSP Specific Plan Site with modernized affordable and moderate housing units, as well as rehabilitation of the remaining housing units of Rancho San Pedro, would increase property values. Therefore, operation of the Partial Preservation Alternative would result in beneficial direct and indirect environmental justice impacts.

The Partial Preservation Alternative would include building designs that integrate into the surrounding neighborhoods, take advantage of waterfront views, and integrate new amenities with a focus on developing an active, healthy community. Therefore, buildout of the Partial Preservation Alternative would provide an increased sense of social connectedness and an increased sense of identity or feeling of pride in the San Pedro CPA, and indirect environmental justice impacts would be beneficial.

As discussed in Section 7.2.8, *Public Participation*, scoping for the project involved public noticing and virtual public scoping meetings to invite the public, including residents of the project site and surrounding area, which is an environmental justice community. During the public scoping period and scoping meetings for the project, community residents and other members of the public could provide comments on the design of the project and the scope of environmental analysis in this EIR/EIS. The NEPA and CEQA compliance processes allow for additional opportunities to comment on the project and this EIR/EIS, as described in Section 7.2.8. Therefore, the Partial Preservation Alternative would include full and fair participation by environmental justice communities in the decision-making process, and would prevent the denial of, reduction in, or substantial delay in the receipt of benefits by low-income and minority populations. This would be an indirect beneficial environmental justice impact.

Cumulative Effects

As previously discussed, minority and low-income populations are present in the project area. As discussed in Section 3.4, *Cumulative Development*, there are 12 additional projects considered in the cumulative impact analysis. The cumulative projects consist of infill development, including apartments, mixed-use, retail, office, and hotel uses, within urbanized areas of San Pedro containing similar existing uses. As discussed in Section 7.4.17, if construction of any of the project build alternatives occurs concurrently with the construction of cumulative projects in proximity to the project site, construction of the cumulative projects would temporarily increase worker commute times, which would result in a less than significant cumulative environmental justice impact, and the project alternatives' contributions would not be cumulatively considerable.

Similar to the project build alternatives, the creation of temporary construction jobs associated with the cumulative projects would result in beneficial cumulative environmental justice impacts, and the project alternatives' contributions would not be cumulatively considerable.

Similar to the project build alternatives, construction associated with the cumulative projects would cause temporary construction-related human health/environmental effects, such as increased dust,

diesel exhaust, and noise; however, such effects would be similar to those of other similarly-sized construction projects. Therefore, construction of the cumulative projects would not result in disproportionately high and adverse human health/environmental effects borne predominately by low-income and/or minority populations. As such, the cumulative projects would result in no direct construction-related environmental justice impact, and the project alternatives' contributions would not be cumulatively considerable.

As discussed in Section 7.4.17, after construction of the cumulative projects, there would be a net increase in housing units and commercial uses, which would accommodate new residents and new employees in the project area. Modernization of existing, aging infill development and added community amenities associated with the cumulative projects, such as improvements to existing roadways, pedestrian and bicycle facilities, recreational facilities, and utilities, would increase property values and help develop an active, healthy community in the San Pedro CPA. Furthermore, buildout of the cumulative projects would provide an increased sense of social connectedness and an increased sense of identity or feeling of pride in the San Pedro CPA. Therefore, operation of the cumulative projects would result in beneficial cumulative environmental justice impacts, and the project alternatives' contributions would not be cumulatively considerable.

As discussed in Section 7.4.17, scoping for cumulative projects would involve proper and adequate public noticing and public scoping meetings to invite the public, including residents of the project area, which is an environmental justice community. During the public scoping periods and scoping meetings for cumulative projects, community residents and other members of the public can provide comments on the design of the cumulative projects and the scopes of required environmental documentation. The NEPA and CEQA compliance processes allow for additional opportunities to comment on a project and its environmental documentation. Therefore, the cumulative projects would include full and fair participation by environmental justice communities in the decision-making process, and would prevent the denial of, reduction in, or substantial delay in the receipt of benefits by low-income and minority populations. This would result in a beneficial cumulative environmental justice impact, and the project alternatives' contributions would not be cumulatively considerable.

7.5 Other Required Disclosures

This section discusses the relationship between short-term uses of the environment and potential long-term productivity of the project; the irreversible and irretrievable commitments of resources associated with implementation of the project; and the potentially significant and unavoidable impacts of the project as identified in Section 7.4.

7.5.1 Relationship between Short-Term Use of the Environment and the Maintenance and Enhancement of Long-Term Productivity

NEPA requires consideration of the relationship between short-term uses of the environment and long-term productivity associated with federal actions (42 USC Section 4332). This comparison is generally understood to recognize that a short-term (temporary) use of the environment may enable the advancement of long-term community needs. For example, construction of a school would adversely affect traffic and air quality in the short-term but would fulfill a long-term community need to provide sufficient school facilities. A community might be willing to accept this trade-off. Within the context of this EIS, "short-term" refers to the construction period, while "long-term" refers to the operational life of the project.

As summarized Table 7-1 and as discussed in Section 7.4, the project would result in both short-term and long-term potentially significant impacts on the project site. Construction of the project would cause the following short-term potentially significant impacts under all three of the project build alternatives: increased noise and vibration levels. The project would be completed in phases with the final phase to be completed by 2037 (under the Proposed Project Alternative); as such, construction-related effects would be temporary, and would not be expected to alter the long-term productivity of the project site or its adjacent uses. Operation of the project would cause the following long-term potentially significant impacts under the Proposed Project Alternative and the Partial Rehabilitation Alternative only: demolition or partial demolition of a historic resource (Rancho San Pedro) and increased noise associated with outdoor recreation and park areas at the OSP Specific Plan Site. These impacts would be minimized to the extent feasible through the implementation of mitigation measures; however, even with implementation of feasible mitigation, these short-term and long-term potentially significant impacts would remain potentially significant and unavoidable. Regardless, these project-related potentially significant impacts would not substantially affect the long-term productivity of the project site.

Upon completion of the construction of the project build alternatives, the productivity of the project site would be enhanced foremost through an increase of housing units by up to 1,122 units under the Proposed Project Alternative, 47 units under the Historic Rehabilitation Alternative, and 729 units under the Partial Preservation Alternative in an environmental justice community (i.e., a minority and low-income population; refer to Section 7.4.18). Buildout of the project build alternatives would improve housing conditions and increase property values. Buildout of the Proposed Project Alternative would also provide an increased sense of social connectedness and an increased sense of identity or feeling of pride in an environmental justice community. Additionally, the Proposed Project Alternative and Partial Preservation Alternative would increase recreational opportunities on the project site by creating new parks and/or play fields and enhancing pedestrian access in the project area. Therefore, it is anticipated that despite having several short-term and long-term potentially significant impacts on the project site, the project would substantially enhance the long-term productivity of the project site.

7.5.2 Irreversible and Irretrievable Commitment of Resources and Energy Consumption

NEPA requires that an environmental analysis include identification of “any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented” (42 USC Section 4332). Irreversible and irretrievable commitments are related to the use of nonrenewable resources and the effect that this use could have on future generations.

Within the context of this EIS, “irreversible” commitments refer to those resources which are either destroyed or otherwise altered such that they can never be recovered. Examples of irreversible commitments include the consumption of fossil fuel energy resources or the filling of wetlands. “Irretrievable” commitments refer to those resources which are depleted for the foreseeable future but could be recovered eventually with varying levels of effort. Examples of irretrievable commitments include the closure of recreational areas during construction of the project that would be reopened following construction, or the build-up of available land that could eventually be reused once existing development is removed.

Implementation of the project build alternatives would result in the irreversible or irretrievable commitment of energy and material resources during the construction and operation of the project, including the following:

- Construction materials (e.g., fill soils, lumber, concrete, gravel, asphalt, metals, water)
- Land area committed to project components (e.g., OSP Specific Plan Site and 327 Harbor Site)
- Energy expended in the form of electricity, gasoline, and/or diesel for construction, operation, and maintenance of the project (e.g., construction equipment, use of vehicles, landscaping equipment, etc.)

Fossil fuel energy and certain construction materials (e.g., concrete) would be irreversibly committed to the project, as they would materially change during use. Other construction materials (e.g., metals or fill soils) and land area would be irretrievably committed to the project, as they could be recycled or reused for other purposes only if the project were dismantled.

The use of these nonrenewable resources would be expected to account for only a small portion of the region's resources and would not affect the availability of these resources for other needs within the region. Construction activities would not result in inefficient use of energy or natural resources. Construction contractors selected would use the best available engineering techniques, construction and design practices, and equipment operating procedures. Long-term operation of the project build alternatives would not result in substantial long-term consumption of energy or natural resources.

7.5.3 Potentially Significant and Unavoidable Adverse Impacts

The No Project Alternative would not result in potentially significant and unavoidable adverse impacts as the No Project Alternative would not involve ground-disturbing construction activities or change the existing uses or population of the project site.

Implementation of the project build alternatives would result in potentially significant and unavoidable adverse impacts to multiple technical resource areas, as listed below:

7.5.3.1 *Proposed Project Alternative*

- Construction Noise and Vibration
- Operational Noise
- Historic Resources

7.5.3.2 *Historic Rehabilitation Alternative*

- Construction Noise and Vibration

7.5.3.3 *Partial Participation Alternative*

- Construction Noise and Vibration
- Operational Noise
- Historic Resources

Impacts to these technical resource areas are summarized in Table 7-1 and detailed in Section 7.4. Potentially significant adverse impacts would be minimized to the extent feasible with implementation of appropriate mitigation measures, as discussed in Section 7.4.

7.6 List of Preparers

This section provides the names and titles/roles of each person involved in the preparation of this EIS.

7.6.1 LAHD

Craig Arceneaux, Director of Housing

Jinderpal Bhandal, Environmental Affairs Officer

7.6.2 HACLA

Douglas Guthrie, President and Chief Executive Officer

Jenny Scanlin, Chief Strategic Development Officer

Zoe Kranemann, Development Officer

7.6.3 Rincon Consultants, Inc.

Deanna Hansen, Principal in Charge

Melissa Whittemore, Senior Project Manager

Emily Marino, Deputy Project Manager

Josh Carman, Director – Noise, Air Quality, and GHG

Heather Dubois, Senior Air Quality and GHG Specialist

Ethan Knox, Environmental Planner

7.7 List of Stakeholders

This section includes a list of all agencies, officials, and Native American tribes that have been consulted throughout the NEPA process. Stakeholders are organized below as follows: federal agencies, State agencies; regional, county, municipal, and other local agencies; and Native American tribes. These stakeholders received the NOI circulated on January 13, 2021, as discussed in Section 7.2.8, *Public Participation*. The stakeholders have been sent a copy of the NOA for the Draft EIS, and they will also receive an NOA for the Final EIS, once available.

7.7.1 Federal Agencies

Congresswoman Nanette Diaz Barragan
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francisco.carrillo@mail.house.gov

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Office of Congresswoman Nanette Diaz
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United States Department of Housing and
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Attention: Laurie Cannady Udit, Field Office
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300 North Los Angeles Street, Suite 4054
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United States Environmental Protection
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United States Fish and Wildlife Service, Pacific
Southwest Region
2493 Portola Road, Suite B
Ventura, California 93003

7.7.2 State Agencies

California Department of Fish and Wildlife,
Region 5
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3883 Ruffin Road
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California Department of Toxic Substances
Control
Attention: Robert Irving
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California Department of Transportation,
District 7
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200 South Main Street, MS 16
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California State University, Dominguez Hills
and American Indian Center
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7.7.3 Regional, County, Municipal, and Other Local Agencies

Regional

Los Angeles Regional Water Quality Control Board
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South Coast Air Quality Management District
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County

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Harbor Occupational Center (Los Angeles United School District)
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Los Angeles County San Pedro Service Center
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Los Angeles County San Pedro Service Center
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One San Pedro Specific Plan

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Los Angeles Unified School District, Office of
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San Pedro High School
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Other Local Agencies and Utility Companies

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City of Long Beach, Development Services
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411 West Ocean Boulevard
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City of Signal Hill, Community Development
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City of Torrance, Community Development
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7.7.4 Native American Tribes

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Fernandeño Tataviam Band of Mission Indians
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Gabrielino/Tongva San Gabriel Band of
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San Fernando Band of Mission Indians
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Soboba Band of Luiseño Indians
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