



One San Pedro Specific Plan

Final Environmental Impact Report/
Environmental Impact Statement
State Clearinghouse Number: 2021010117

prepared by

Housing Authority of the City of Los Angeles

2600 Wilshire Boulevard

Los Angeles, California 90057

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and

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Contact: Jinderpal Bhandal, Environmental Affairs Officer

prepared with the assistance of

Rincon Consultants, Inc.

250 East 1st Street, Suite 1400

Los Angeles, California 90012

October 2023

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RINCON CONSULTANTS, INC.

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1 Introduction

1.1 Final EIR/EIS Contents

This Final Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) has been prepared by the Housing Authority of the City of Los Angeles (HACLA) and Los Angeles Housing Department (LAHD) to evaluate the potential environmental impacts of the proposed One San Pedro (OSP) Project (“proposed project” or “project”).

As prescribed by the California Environmental Quality Act (CEQA) Guidelines Sections 15088 and 15132 and 40 Code of Federal Regulations (CFR) Parts 1502 and 1503, the Final EIR/EIS must:

- Summarize public involvement;
- List the persons, organizations, and public agencies commenting on the Draft EIR/EIS and provide copies or summaries of their comments;
- Provide written responses to the substantive comments received on the Draft EIR/EIS;
- Describe revisions to the Draft EIR/EIS; and
- Provide a Mitigation Monitoring and Reporting Program (MMRP) that lists the mitigation measures to be incorporated and describes the monitoring and reporting requirements.

This document, together with the Draft EIR/EIS (incorporated by reference) comprise the Final EIR/EIS for this project. The Final EIR/EIS includes the following contents:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft EIR/EIS (includes a list of all commenters and public comment letters)
- Section 3: Amendments to the Draft EIR/EIS (errata)
- Section 4: MMRP
- Appendices:
 - Appendix A: Draft EIR/EIS Public Meeting Presentation
 - Appendix B: Draft EIR/EIS Public Meeting Transcript
 - Appendix C: Supplemental Construction Hauling Emissions Data

1.2 Public Review Process

In compliance with the CEQA Guidelines and 24 CFR Part 58, HACLA and LAHD have taken steps to provide opportunities for participation in the environmental process, including the distribution of a Notice of Preparation (NOP) and Notice of Intent (NOI) and public scoping meetings to inform the preparation of Draft EIR/EIS and a Notice of Availability (NOA) and public meeting to solicit comments on the Draft EIR/EIS.

Pursuant to Section 15082 of the CEQA Guidelines, HACLA circulated an NOP to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on January 13, 2021 for a 30-day review period, which ended on February 12, 2021. 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, which ended on May 10, 2021. In addition, three public scoping meetings were held in 2021. The NOP, NOI, and public comments received during the scoping period were included in Appendix A of the Draft EIR/EIS.

Consistent with the requirements of CEQA Guidelines Sections 15087 and 15105 and 40 CFR Section 1506.10, a Notice of Availability (NOA) was published with the State Clearinghouse, Federal Register, and Los Angeles County Clerk on June 23, 2023 to begin the 60-day public review period, which ended on August 21, 2023. Copies of the NOA were mailed to the interested parties list and the NOA was published in the Daily Breeze, a local newspaper, on June 16, 2023. The Draft EIR/EIS was made available on the HUD, HACLA, and LAHD websites and printed copies were made available in five locations. In addition, a public meeting was held on June 28, 2023 to discuss the results of the Draft EIR/EIS and solicit public comments (refer to Appendix A and Appendix B for materials from the public meeting). The documents for the EIR/EIS were converted to an “accessible” format so that those with accessibility issues could read the files online on the HUD, HACLA, and LAHD websites.

As a result of these notification efforts, verbal comments from 15 individuals during the public meeting and five written comment letters on the Draft EIR/EIS were received. Section 2, “Responses to Comments on the Draft EIR/EIS,” identifies these commenting parties, their respective comments, and responses to these comments.

1.3 Draft EIR/EIS Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when comments on the Draft EIR or responses thereto identify “significant new information.” Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft EIR/EIS amendments presented in this document do not constitute such “significant new information;” instead, they clarify, amplify, or make insignificant modifications to the Draft EIR/EIS. For example, none of the comments, responses, and Draft EIR/EIS amendments disclose new or substantially more severe significant environmental effects of the proposed project. Additionally, no new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR/EIS that would clearly lessen the proposed project’s significant effects were added in response to the comments.

2 Responses to Comments

This section includes comments received during public circulation of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) prepared for the One San Pedro (OSP) Specific Plan (proposed project or project).

The Draft EIR/EIS was circulated for a 61-day public review period that began on June 23, 2023 and ended on August 21, 2023. Five comment letters on the Draft EIR/EIS were received, and verbal comments were also collected during a public meeting held on June 28, 2023 (refer to Appendix A of this Final EIR/EIS for the public meeting materials and transcript and copies of the written comment letters). The commenters are listed below.

Letter No. and Commenter	
Verbal Comments	
1	Reverend Jeanette Repp
2	Liz Johnson
3	Ren MacMorran
4	Nilo Michelin
5	Gwen Henry
6	Jonathan
7	Elizabeth Barajas
8	Beatriz Mendez
9	Sara
10	Ziggy Mrkich
11	Alma
12	Maria Montes
13	Maria Luhan
14	Carrie
15	Isabel Barajas
Written Comments	
1	Andrew Salas, Chairman, Gabrieleño Band of Mission Indians — Kizh Nation
2	Yolanda Rodarte
3	Sam Wang, CEQA-IGR Program Supervisor, South Coast Air Quality Management District (SCAQMD)
4	Ray Regalado, President, Northwest San Pedro Neighborhood Council
5	Connell Dunning for Jean Prijatel, Environmental Review Branch Manager, U.S. Environmental Protection Agency (EPA)

The verbal comments are summarized with responses provided to each topic raised. The comment letters are numbered sequentially, and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the verbal comment or comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in Comment Letter 1).

Where a comment resulted in a change to the Draft EIR/EIS text, a notation is made in the response indicating that the text is revised. Changes in text are signified by strikeout font (~~strikeout font~~) where text was removed and by underlined font (underlined font) where text was added. These changes in text are also included in Section 3, *Revisions to the Draft EIR*.

Verbal Comment 1

COMMENTER: Reverend Jeanette Repp

DATE: June 28, 2023

Comment 1.1

Regarding tribal cultural resources, were the buildings originally built on fill or on native soil?

Response 1.1

As discussed in pages 4.4-2 through 4.4-5 of the Draft EIR/EIS the upper 10 feet of soil at the 327 Harbor Site is fill and the OSP Specific Plan Site contains around five to 25 feet of fill across most of the site, with some areas containing no fill.

Comment 1.2

We've heard in the news that there are plans to resurface the Vincent Thomas Bridge and redesign some of the connections between the bridge, Harbor Boulevard, State Route (SR) 47, and SR 110. Will the timing of that coincide with construction of the project and how will that be taken into consideration?

Response 1.2

The timing of construction of the Vincent Thomas Bridge and associated infrastructure is unknown because it is still in the planning phase and has not yet been approved by the California Department of Transportation. However, as discussed on page 4.12-19 of the Draft EIR/EIS, the proposed project would implement a construction management plan that would be approved by the Los Angeles Department of Transportation (LADOT), who would also be aware of and involved in the roadway improvements associated with the Vincent Thomas Bridge (once it is approved), to minimize the impacts of construction activities on the transportation system.

Verbal Comment 2

COMMENTER: Liz Johnson

DATE: June 28, 2023

Comment 2.1

Is parking analyzed in the EIR/EIS and will there be a certain ratio used to determine how much parking is required for each unit? I ask about parking because the Grand Vision Foundation has an arts and cultural district adjacent to this project and I want to make sure we can all enhance one another.

Response 2.1

The proposed parking ratios and number of parking spaces for the project are described in Section 2, *Project Description* (refer to Tables 2-2, 2-5, and 2-8) of the Draft EIR/EIS. The proposed project would provide 2,137 vehicle parking spaces, including 292 on-street spaces. Additionally, the potential for the proposed project to conflict with relevant City of Los Angeles policies related to parking is addressed in pages 4.12-21 through 4.12-27 of the Draft EIR/EIS and the potential for the proposed project to result in impacts to on-street parking supply is addressed in pages 7-149 through 7-156. As described therein, the proposed project would not conflict with the City's parking policies or result in a decrease in on-street parking availability.

Verbal Comment 3

COMMENTER: Ren MacMorran

DATE: June 28, 2023

Comment 3.1

Will the landscaping be using plants native to the Southern California coastal areas?

Response 3.1

Section 2, *Project Description*, of the Draft EIR/EIS includes a discussion of the landscaping plans for the proposed project. As discussed on page 2-42, at least 80 percent of the landscaping would be planted with drought-tolerant shrubs and groundcover. Plant species would be native and/or adaptive to the region, reflecting the southern California coastal environment and enhancing the urban habitat to support local wildlife.

Comment 3.2

Are all of the project amenities going to be available to the general public or will they just be available to residents within the buildings?

Response 3.2

This comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR/EIS; however, a response is provided for informational purposes. The amenities provided on the project site, such as the parks, social hall, and community rooms, will include a mix of publicly accessible and resident-only amenities as described in Section 2, *Project Description*, of the Draft EIR/EIS. Using open space as an example, the project would include 5.3 acres of publicly accessible parks, as well approximately 3.4 acres of common open space and recreational amenities, such as courtyards, barbeque areas, and fitness centers that would be reserved for use by residents only.

Verbal Comment 4

COMMENTER: Nilo Michelin

DATE: June 28, 2023

Comment 4.1

How will the noise pollution from this project affect San Pedro High School? Will construction work around the school schedule?

Response 4.1

The potential for construction noise to affect nearby schools is addressed in Section 4.9, *Noise*, of the Draft EIR/EIS. San Pedro High School is located over one mile southwest of the project site. Due to the distance and existing development between San Pedro High School and the project site, construction activities on the project site would not result in significant noise impacts to San Pedro High School.

Comment 4.2

The Draft EIR/EIS found a significant and unavoidable noise impact in this working-class area. Are there going to be limits on the start and end time of construction, including on the weekends?

Response 4.2

As stated on page 2-49 of the Draft EIR/EIS, project construction activities would comply with the City of Los Angeles Noise Regulations. Los Angeles Municipal Code (LAMC) Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday. Project construction hours would generally be limited to Monday through Friday from 7:00 a.m. to 3:30 p.m., with occasional work on Saturdays.

Verbal Comment 5

COMMENTER: Gwen Henry

DATE: June 28, 2023

Comment 5.1

There are predictions of urban heat increasing over the years. Will plants on the project site include shade trees to help compensate for future heat increase in the city?

Response 5.1

As described on page 2-42 of the Draft EIR/EIS, the proposed project would include trees in the landscaping design, including street trees and trees in the open space areas, that would help provide shade. Furthermore, buildings and open space areas would be designed to incorporate shade elements such as overhangs, canopies, awnings, and fins to control solar access while limiting obstructions of views.

Comment 5.2

Will there be safe bike lanes to reduce conflicts between bikes and traffic?

Response 5.2

As described in pages 2-25 through 2-28 of the Draft EIR/EIS, the proposed project would include new bike 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 safety and access. In addition, a bike hub with secure bicycle parking, showers/lockers, and a retail, rental, and repair shop would be included on the OSP Specific Plan Site. Bicycle parking and bike-share stations would be readily available throughout the project site. As discussed in pages 4.13-29 through 4.13-32 of the Draft EIR/EIS, conflicts between bicyclists and vehicle drivers would be further reduced by consolidating the number of driveways on the project site, resulting in fewer driveways and curb cuts compared to existing conditions.

Verbal Comment 6

COMMENTER: Jonathan

DATE: June 28, 2023

Comment 6.1

I am wondering if there are going to be available resources to people that already live around the residence before redevelopment.

Response 6.1

This comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR/EIS; however, it will be shared with the decisionmakers for their consideration (CEQA Guidelines, §15204(a) [lead agencies need only respond to significant environmental issues]). For informational purposes, the project would include 5.3 acres of publicly accessible parks, as well as new bicycle lanes, a mobility hub, and improved pedestrian facilities that would also be of service to residents living in the area.

Verbal Comment 7

COMMENTER: Elizabeth Barajas

DATE: June 28, 2023

Comment 7.1

Can you clarify the number of phases that the project will have?

Response 7.1

As described in Section 2.5.4, *Project Construction*, of the Draft EIR/EIS, construction of the project on the OSP Specific Plan Site would occur in 11 stages across three main Phases. Figure 2-18 in Section 2, *Project Description*, of the Draft EIR/EIS provides an illustration of the location of the project Phases and construction stages.

Verbal Comment 8

COMMENTER: Beatriz Mendez

DATE: June 28, 2023

Comment 8.1

With the modernization of the project site and San Pedro, in general, how will traffic congestion be taken care of?

Response 8.1

As described in pages 4.13-7 and 4.13-8 of the Draft EIR/EIS, Senate Bill (SB) 743 eliminated auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. CEQA Guidelines Section 15064.3, a component of SB 743, establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. This comment does not relate to the Draft EIR/EIS; however, a response is provided for informational purposes.

As described in Section 4.13, *Transportation*, and Section 7.4.13, *Environmental Impact Statement: Transportation and Circulation*, of the Draft EIR/EIS, the proposed project includes traffic demand management features, such as improvements to pedestrian, bicycle, and public transit infrastructure, that would help reduce the amount of vehicle trips and traffic associated with the new development. The proposed project would include new traffic signals at the intersections of 3rd Street and Harbor Boulevard and 2nd Street and South Pacific Avenue, as well as intersection restriping, if required by LADOT, at several intersections with traffic concerns to reduce vehicle queueing.

Comment 8.2

With the Port of Los Angeles being nearby and the traffic concerns in the area, what are the plans to ensure that emergency evacuation can occur in case of a disaster or terrorism?

Response 8.2

The City of Los Angeles Emergency Management Department is responsible for preparing and maintaining disaster management and emergency response and evacuation plans for San Pedro. Nearby designated evacuation routes in the event of a disaster include Harbor Boulevard, South Pacific Avenue, SR 47, and SR 110. As discussed in pages 4.6-43 and 4.6-44 of the Draft EIR/EIS, the proposed project would have a less than significant impact to emergency response and evacuation plans. The proposed project would include new traffic signals at the intersections of 3rd Street and Harbor Boulevard and 2nd Street and South Pacific Avenue, as well as restriping of two intersections on Harbor Boulevard to improve queueing. These new features would improve traffic flow and the movement of vehicles to these designated disaster routes.

Verbal Comment 9

COMMENTER: Sara

DATE: June 28, 2023

Comment 9.1

Are any of the residential buildings going to be Section 8?

Response 9.1

This comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR/EIS (CEQA Guidelines, §15204(a) [lead agencies need only respond to significant environmental issues]). However, for informational purposes, according to the One San Pedro Transformation Plan, all 478 public housing units will be replaced one to one in the new development. It is anticipated that most, if not all, of these replacement units will be subsidized using Section 8 vouchers. Additionally, approximately 80 percent of the total new rental units will be restricted for low and very low-income households; it is likely that many of these units will be subsidized using a Section 8 project-based voucher. The Section 8 voucher program includes the Rental Assistance Demonstration Vouchers, Tenant Protection Vouchers, and Project Based Vouchers. Various combinations of these voucher types may be used in any of the rental phases in order to facilitate the financing of the housing units.

Verbal Comment 10

COMMENTER: Ziggy Mrkich

DATE: June 28, 2023

Comment 10.1

Will the project utilize solar power or other alternative forms of energy?

Response 10.1

As described in pages 2-46, 2-47, and 4.5-39 of the Draft EIR/EIS, the proposed project would include rooftop solar panels, as well as various energy-saving features such as efficient lighting, appliances, and heating, ventilation, and air conditioning systems. Per PDF GHG-1, active photovoltaic solar would be installed on the project site to produce a minimum rate of 15 percent electricity demand, and per PDF GHG-2, the proposed project would comply with Tier II voluntary Title 24 measures, which require that a total of 40 percent of parking spaces are EV ready and a minimum of 15 percent of parking spaces are equipped with EV chargers.

Verbal Comment 11

COMMENTER: Alma

DATE: June 28, 2023

Comment 11.1

When will construction start?

Response 11.1

The exact construction schedule is not known at this time; however, as described in pages 2-47 through 2-51 of the Draft EIR/EIS, for the purposes of the Draft EIR/EIS analysis, construction would begin at the 327 Harbor Site in late 2023.

Verbal Comment 12

COMMENTER: Maria Montes

DATE: June 28, 2023

Comment 12.1

What does the abbreviation EIR/EIS stand for?

Response 12.1

EIR stands for Environmental Impact Report and EIS stands for Environmental Impact Statement.

Comment 12.2

How will resident parking be affected by construction workers during project construction?

Response 12.2

As described on page 4.13-19 of the Draft EIR/EIS, the proposed project would implement a Construction Management Plan that includes specific, off-street parking locations where construction equipment would be staged, and construction workers would be permitted to park in order to minimize impacts to existing residents of Rancho San Pedro and the surrounding neighborhood.

Verbal Comment 13

COMMENTER: Maria Luhan

DATE: June 28, 2023

Comment 13.1

Will the new apartments be the same size or smaller than the existing apartments at Rancho San Pedro?

Response 13.1

This comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR/EIS (CEQA Guidelines, §15204(a) [lead agencies need only respond to significant environmental issues]).

Verbal Comment 14

COMMENTER: Carrie

DATE: June 28, 2023

Comment 14.1

Is there a purpose for the 327 Harbor Site building beyond serving as temporary housing during construction?

Response 14.1

The 327 Harbor Site would be a permanent new affordable housing building and would continue to serve as affordable housing even after the OSP Specific Plan Site has been constructed. The 327 Harbor Site is an integral component of HACLA's overall relocation program for the OSP development. The proposed project objectives and benefits, including those related to the 327 Harbor Site, are discussed in pages 2-54 and 2-55 of the Draft EIR/EIS.

Comment 14.2

Will there be facilities for children, seniors, and pets included in the project?

Response 14.2

As discussed in Section 2, *Project Description*, of the Draft EIR/EIS, the proposed project would include amenities such as a Youth Sports Field and Youth Center that would serve children specifically, as well as public parks (including a potential dog park) that could be used by community members of all ages and those with pets. Additional amenities would include spaces such as community rooms, a social hall, and wellness center that would provide services for residents and could potentially be used for senior programming. The project would also include senior affordable housing.

Comment 14.3

How much of the commercial space will be used for amenities such as meeting rooms, classrooms, and libraries and how much would be for private and commercial space?

Response 14.3

As discussed in pages 2-18 and 2-19 of the Draft EIR/EIS, the proposed project would include up to 45,000 square feet (sf) of commercial retail space for uses such as grocery stores, retail, and restaurants. In addition, up to 85,000 sf of Neighborhood Serving Uses would be developed, which includes a mix of amenities such as community rooms, health clinics, and social service offices, as well as some small-scale retail that provide goods and services such as convenience stores, dry cleaning, and bakeries.

Verbal Comment 15

COMMENTER: Isabel Barajas

DATE: June 28, 2023

Comment 15.1

We currently have a community garden with trees on the OSP Specific Plan Site. What will happen to the garden and the trees? Will a community garden be included when the site is redeveloped?

Response 15.2

This comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR/EIS (CEQA Guidelines, §15204(a) [lead agencies need only respond to significant environmental issues]). However, for information purposes, a community garden would be included as part of the project due to the importance of this amenity to residents. Trees removed during construction of the project would be replaced in accordance with the City's tree replacement requirements, as addressed on page 4.16-3 of the Draft EIR/EIS.

Comment Letter 1

COMMENTER: Andrew Salas, Chairman, Gabrieleño Band of Mission Indians — Kizh Nation

DATE: June 28, 2023

Comment 1.1

Please note that we disapprove with any other entity being implemented in the mitigation measures. We take seriously the protection of our Tribal cultural resources as we are the legitimate lineal descendants of this location. If you want to include other groups that you believe are ancestrally descending from this location, that will be your choice. However, we ask that you keep their mitigations separate than ours. If our Tribal resources are discovered during ground disturbance activities for this project and they are wrongfully handled or worse, damaged by those other groups, the Housing Authority of the City of Los Angeles (HACLA) could be held liable for any damages.

Response 1.1

As communicated to the Gabrieleño Band of Mission Indians — Kizh Nation throughout the Assembly Bill 52 and Section 106 tribal consultation process, the Gabrielino Tongva Indians of California Tribal Council has also been a consulting party with HACLA under Section 106 for this project. As requested by the Gabrieleño Band of Mission Indians — Kizh Nation, Section 4.14, *Tribal Cultural Resources*, includes Mitigation Measures TCR-3 and TCR-4, which provides for coordination with the Gabrieleño Band of Mission Indians — Kizh Nation, specifically, and Mitigation Measures TCR-1 and TCR-2, which provides separate mitigation for coordination with the Gabrielino Tongva Indians of California Tribal Council. The mitigation measures were modified to provide separate sets of mitigation measures for each consulting tribe, so as not to interfere with or prioritize any one tribe's preferred monitoring practices or treatment of Tribal Cultural Resources that have yet to be identified.

Comment 1.2

Please keep this letter on file as part of Section 106 consultation. We will be waiting on word from you when the project begins.

Response 1.2

The comment letter is part of the Section 106 consultation and EIR/EIS record. The Gabrieleño Band of Mission Indians — Kizh Nation will be contacted at least 30 days prior to the start of construction and invited to participate in construction monitoring consistent with the requirements of Mitigation Measure TCR-3.

Comment 1.3

The commenter provides documentation of his Indian ancestry and Gabrieleño Band of Mission Indians — Kizh Nation lineage.

Response 1.3

This documentation is noted.

Comment Letter 2

COMMENTER: Yolanda Rodarte

DATE: July 3, 2023

Comment 2.1

I have a question that I didn't have the opportunity to ask on the meeting on June 28 at the boys and girls club the question is 1. What is the most important step in the environmental impact statement?

Response 2.1

The environmental review process for this project included the following steps: (1) a Notice of Preparation and Notice of Intent were published in 2021 and meetings about the project were held to inform the public of the environmental review process and seek public input; (2) the Draft EIR/EIS was prepared, and the document was published for public review and comment in June 2023; (3) this Final EIR/EIS was prepared, which includes the following: responses to public comments, revisions to the Draft EIR/EIS made in response to the public comments, and the Mitigation Monitoring and Reporting Program (MMRP); and (4) HACLA and LAHD will consider and determine whether to certify the Final EIR/EIS and approve the project. Each of these steps are required as part of the environmental review process.

Comment 2.2

2. How do environmental issues disproportionately impact communities with high poverty?

Response 2.2

Pages 7-194 through 7-202 of the Draft EIR/EIS, provide a discussion of this issue and addresses the potential for the proposed project to result in disproportionate environmental impacts on environmental justice communities, including low-income and minority populations. As discussed therein, the proposed project would have less than significant environmental justice impacts.

Comment Letter 3

COMMENTER: Sam Wang, SCAQMD Program Supervisor, CEQA-IGR

DATE: August 16, 2023

Comment 3.1

Based on the Hazard and Hazardous Materials Section of the Draft EIR/EIS, the proposed project would have concerns regarding the elevated concentrations of, for instance, polynuclear aromatic hydrocarbon (PAHs), metals (specifically lead), and volatile organic compounds (VOCs) at either or both the OSP Specific Plan Site and 327 Harbor Site. In addition, there is potential for the presence of asbestos-containing materials (ACMs), lead and lead-based paint (LBP), and polychlorinated biphenyls (PCBs) to exist in buildings on the OSP Specific Plan Site. Due to past uses, contaminated soil is present and high levels of VOCs have been detected in soil vapor on the OSP Specific Plan Site and 327 Harbor Site. Thus, construction activities of the proposed project, such as excavation and grading, would result in a potentially significant hazard to the public or the environment. The Lead Agency proposes mitigation measures HAZ-1 to HAZ-5 to reduce the significant impacts. However, the Draft EIR/EIS does not analyze the air quality impacts from the remediation activities during construction.

Cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may differ from typical equipment for grading and site preparation for construction. Because cleanup activities are reasonably foreseeable, the Lead Agency should use good faith and best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities, and include those emissions in the proposed project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR/EIS. Alternatively, if emissions from cleanup activities are not included in the Final EIR/EIS, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final EIR/EIS to commit to evaluating the potential environmental impacts from cleanup activities through CEQA prior to commencing any cleanup activities. If a new air quality mitigation measure is not included in the Final EIR/EIS, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

Response 3.1

The Draft EIR/EIS includes analysis of the excavation of soils associated with the construction of the project, as stated on page 2-49 of the Draft EIR/EIS. The estimated 378,645 cubic yards of soil removal at the OSP Specific Plan Site and 4,300 cubic yards of soil removal at the 327 Harbor Site include contaminated soils that would need to be removed or remediated during construction activities. The California Emissions Estimator Model (CalEEMod) inputs for construction include removal and hauling of the abovementioned quantities of soil from the project site (refer to Appendix B of the Draft EIR/EIS for CalEEMod inputs and results). The level of currently modeled construction activities would be comparable or more intensive than what would be encountered during the removal of contaminated soils, as removal of contaminated soils would occur at a slower rate than typical excavation, where the disposal of clean fill has less restrictions on handling. Therefore, considering the removal of soil contamination would require less intensive construction equipment use and the amount of soil excavation was accounted for in the original analysis, the

emissions associated with the removal of contaminated soils has been addressed in the existing analysis. Accordingly, new air quality mitigation measures are not required because emissions from these remedial activities have already been accounted for in the draft EIR/EIS, and with the implementation of mitigation, these impacts will be less than significant.

As detailed on page 4.6-35 of the Draft EIR/EIS, mitigation has been implemented to minimize public exposure to potentially contaminated soils. The mitigation (HAZ-1 through HAZ-3) details the possibility of removal of contaminated soils and disposal at an appropriate landfill. The section does not detail any additional potential remediation methods, as the remediation would be dependent on the type and level of contamination and coordination with the appropriate oversight agency. There are numerous different ways to remediate which are regulated by adopted regulations and policies, and it would be speculative to attempt to quantify air quality emissions from specialized remediation equipment, beyond the excavation and disposal of contaminated soils. Excavation of the potentially contaminated soils would be subject to all applicable regulatory requirements. As discussed above, this has already been accounted for in the Draft EIR/EIS, therefore, no additional analysis needs to be added to address the potential impacts of soil contamination at the site.

Revisions to the Draft EIR/EIS

In order to clarify and acknowledge the potential for the removal of contaminated soils, the following sentence has been added to the Air Quality Analysis's methodology discussion.

Section 4.2, page 4.2-19 of the Draft EIR/EIS:

Construction on the 327 Harbor Site would include site preparation, grading, building construction, paving, and architectural coating. Excavation on the 327 Harbor Site would be a maximum of 5 feet bgs for removal of approximately 4,300 cy of uncertified artificial fill material, except for the placement of 24-inch piles, which would include ground disturbance to a maximum depth of 45 feet bgs. With a capacity of 16 cy per truck, soil hauling from the 327 Harbor Site would result in approximately 280 one-way truck trips. Grading and excavation activities on the project site would include the potential for the excavation and removal of contaminated soil.

Comment 3.2

Under the Project Description section in the Draft EIR/EIS, the exported soil and materials would be transported to Sunshine Canyon Landfill and the Azusa Land Reclamation. Based on the aerial photographs, South Coast AQMD staff measures the distance from the proposed project location to the Sunshine Canyon Landfill and the Azusa Land Reclamation and gets approximately 50 and 42 miles of one-way trip length, respectively. However, according to the emission calculations from the CalEEMod output files, the Lead Agency used a default one-way truck trip length of 20 miles to quantify the proposed project's construction emissions from hauling construction exported soil and materials. Due to the inconsistency of the transport distance, when quantifying emissions from transportation and off-site disposal, the proposed project's construction emissions from haul truck trips for transporting and disposing of contaminated soil based on the appropriate one-way truck trip length should be re-calculated. South Coast AQMD staff recommends that the Lead Agency re-calculate the construction emissions reflecting the correct number of hauling truck trips and the hauling trip lengths in CalEEMod and include them in the Final EIR/EIS. If the number of hauling truck trips and the default one-way truck trip length of 20 miles are not recalculated for quantifying emissions from haul truck trips for transporting contaminated soil, the Lead Agency should provide reasons for not re-calculating it supported by substantial evidence in the record.

Response 3.2

Based on the results of the Environmental Site Assessments prepared for the project, the entire 327 Harbor Site and three areas of the OSP Specific Plan Site primarily located in Phases 1 and 2, with a small area in Phase 3, have the potential to contain contaminated soil (refer to Appendix E of the Draft EIR/EIS). The areas of potential contamination on the OSP Specific Plan Site are shown in yellow in Figure 2-1 below. Contaminated soil would require disposal at the Sunshine Canyon Landfill located 50 miles away from the project site, while uncontaminated soil would be disposed of at the Azusa Land Reclamation facility located 40 miles from the project site.

Hauling emissions were recalculated in CalEEMod 2020.4.0 with a modified trip length of 50 miles for the excavated soils at the 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2. Based on the results of the Environmental Site Assessments prepared for the OSP Specific Plan Site, construction stages 8 and 9, located within the northeastern and southern blocks of Phase 3, would not be anticipated to contain contaminated soils and excavated soils from these areas would be taken to Azusa Land Reclamation, whereas excavated soils from construction stages 10 and 11 could potentially require disposal at Sunshine Canyon due to the presence of contamination (refer to Figure 2-18 of the Draft EIR/EIS for an illustration of the construction stage locations). The haul trip length for Phase 3 was therefore adjusted to an average length of 46.4 miles based on the percent of uncontaminated soil material hauled to Azusa Land Reclamation facility and percent of contaminated soil material hauled to Sunshine Canyon Landfill.

In addition, a revised construction equipment list with a reduced number of equipment pieces for Phase 3 was provided by the Applicant to accurately reflect planned construction activities in this phase. The revised construction air pollutant and greenhouse gas (GHG) emissions estimates resulting from the revisions to the construction trip lengths and the revised construction equipment are shown in the tables on the following pages.¹ As shown therein, even with the increased hauling emissions, the mitigated construction emissions would still be below regulatory thresholds and no additional mitigation would be required.

¹ GHG emissions are presented in the Draft EIS/EIR for informational purposes only and the revised tables simply reflect the additional emissions from haul routes.

Figure 2-1 OSP Specific Plan Site Areas of Potential Contamination



Note: areas of potential contamination shown in yellow.

Revisions to the Draft EIR/EIS

In order to incorporate the revisions to the emissions from the increased hauling distance and revised equipment list for Phase 3, Table 4.2-6, Table 4.2-8, Table 4.2-9, and Table 4.2-11 from Section 4.2, *Air Quality*, Table 4.5-8 and Table 4.5-9 from Section 4.5, *Greenhouse Gas Emissions*, and Table 7-5, Table 7-7, Table 7-8, Table 7-10, Table 7-14, Table 7-16, Table 7-17, and Table 7-19 from Section 7.4.3, *Environmental Impact Statement: Air Quality*², of the Draft EIR/EIS are revised as follows:

Table 4.2-6 Construction Emissions – Regional Threshold Comparison (lbs/day)

Phase/Overlap ¹	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Scenario A (lbs/day)						
327 Harbor Site	4	3439	4041	<1	34	2
OSP Specific Plan Site Phase 1	13	114121	150151	<1	1011	56
OSP Specific Plan Site Phase 2	17	7797	151156	<1	810	34
OSP Specific Plan Site Phase 3	1917	8250	14927	<1	9	3
Overlap by Year²						
2024	15	121128	159	<1	1112	6
2025	13	108114	151152	<1	1011	5
2034	2820	11179	20785	<1	17	65
2035	2418	5033	13376	<1	1516	5
Scenario B (lbs/day)						
327 Harbor Site	4	3439	4041	<1	34	2
OSP Specific Plan Site Phase 1	13	114121	150151	<1	1011	56
OSP Specific Plan Site Phase 2	18	7797	151156	<1	810	34
OSP Specific Plan Site Phase 3	1512	8250	14927	<1	9	3
Overlap by Year²						
2024	15	121128	159	<1	1112	6
2025	13	108114	151152	<1	1011	5
2034	3021	11179	20785	<1	1717	65
2035	2418	5033	13376	<1	1516	5
Maximum (lbs/day)						
Scenario A	28	121128	207159	<1	17	6
Scenario B	30	121128	207159	<1	17	6
<i>Regional Construction Thresholds</i>	75	100	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No

lbs/day = pounds per day; 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; SO₂ = sulfur dioxide; CO = carbon monoxide

¹ The 327 Harbor Site is referred to as “327 Harbor” in the CalEEMod outputs.

² “Overlap by year” rows show the maximum daily emissions where development of Phases overlap. Specifically, during years 2024 and 2025 it is anticipated that construction activities will occur on both the 327 Harbor Site as well as within Phase 1 and in years 2034 and 2035 construction activities will occur in both Phases 2 and 3.

Source: See Appendix B

² Note that the results for the Historic Rehabilitation Alternative remained consistent with the results shown in the Draft EIR/EIS after haul trip lengths were adjusted.

Table 4.2-8 Construction and Operational Overlap Emissions – Regional Threshold Comparison

Plan Area ¹	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Scenario A (lbs/day)						
Construction of OSP Specific Plan Site Phases 2 and 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1						
Construction of OSP Specific Plan Site Phases 2 and 3	<u>2820</u>	<u>11179</u>	<u>20785</u>	<1	17	<u>65</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	20	8	104	<1	19	5
Total	<u>4840</u>	<u>11886</u>	<u>311189</u>	<1	<u>3536</u>	<u>1110</u>
Construction of OSP Specific Plan Site Phase 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2						
Construction of OSP Specific Plan Site Phase 3	<u>1917</u>	<u>8250</u>	<u>14927</u>	<1	9	3
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	48	18	251	<1	47	13
Total	<u>6764</u>	<u>9968</u>	<u>400278</u>	<1	56	16
Scenario B (lbs/day)						
Construction of OSP Specific Plan Site Phases 2 and 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1						
Construction of OSP Specific Plan Site Phases 2 and 3	<u>3021</u>	<u>11179</u>	<u>20785</u>	<1	17	<u>65</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	24	9	123	0	22	6
Total	<u>5445</u>	<u>11988</u>	<u>330208</u>	0<1	39	<u>1211</u>
Construction of OSP Specific Plan Site Phase 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2						
Construction of OSP Specific Plan Site Phase 3	<u>1512</u>	<u>7797</u>	<u>151156</u>	<1	<u>810</u>	<u>34</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	55	21	292	<1	55	15
Total	<u>7167</u>	<u>98118</u>	<u>443447</u>	<1	<u>6465</u>	19
Maximum (lbs/day)						
Max Scenario A	<u>6764</u>	<u>11886</u>	<u>400278</u>	<1	56	16
Max Scenario B	<u>6771</u>	<u>119118</u>	<u>443447</u>	<1	<u>6465</u>	19
<i>Existing</i>	(18)	(9)	(109)	(<1)	(15)	(4)
Net Scenario A	<u>4946</u>	<u>10977</u>	<u>292170</u>	<1	<u>4142</u>	<u>1211</u>
Net Scenario B	<u>5249</u>	<u>110109</u>	<u>334339</u>	<1	<u>4951</u>	<u>1415</u>
Regional Operational Thresholds	55	55	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No

lbs/day = pounds per day; 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; SO₂ = sulfur dioxide; CO = carbon monoxide

Note: Totals may be rounded based on the totals presented in the CalEEMod outputs.

¹ Note that the 327 Harbor Site is referred to as “327 Harbor” in the CalEEMod outputs.

Source: See Appendix B

Table 4.2-9 Mitigated Construction Emissions – Regional Threshold Comparison (lbs/day)

Phase/Overlap ¹	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Scenario A (lbs/day)						
327 Harbor Site	2	8 <u>13</u>	36 <u>37</u>	<1	2	<1
OSP Specific Plan Site Phase 1	7	27 <u>34</u>	132 <u>133</u>	<1	8	2
OSP Specific Plan Site Phase 2	13	26 <u>47</u>	134 <u>138</u>	<1	7 <u>8</u>	2
OSP Specific Plan Site Phase 3	16	30 <u>41</u>	132 <u>32</u>	<1	8 <u>9</u>	2 <u>3</u>
Overlap by Year²						
2024	5	29 <u>36</u>	140 <u>141</u>	<1	5 <u>7</u>	2 <u>2</u>
2025	4	28 <u>34</u>	134 <u>135</u>	<1	5 <u>6</u>	1 <u>2</u>
2034	16 <u>15</u>	40 <u>52</u>	190 <u>91</u>	<1	15 <u>16</u>	4
2035	16 <u>15</u>	27 <u>17</u>	137 <u>77</u>	<1	14 <u>15</u>	4
Scenario B (lbs/day)						
327 Harbor Site	2	8 <u>13</u>	36 <u>37</u>	<1	2	<1 <u>1</u>
OSP Specific Plan Site Phase 1	8	27 <u>34</u>	132 <u>133</u>	<1	8	2 <u>2</u>
OSP Specific Plan Site Phase 2	15	26 <u>47</u>	134 <u>138</u>	<1	7 <u>8</u>	2
OSP Specific Plan Site Phase 3	12	30 <u>41</u>	132 <u>32</u>	<1	8 <u>9</u>	2 <u>3</u>
Overlap by Year²						
2024	5	29 <u>36</u>	140 <u>141</u>	<1	5 <u>7</u>	2
2025	4	28 <u>34</u>	134 <u>135</u>	<1	5 <u>6</u>	1 <u>2</u>
2034	18 <u>16</u>	40 <u>52</u>	190 <u>91</u>	<1	15 <u>16</u>	4
2035	16 <u>15</u>	27 <u>17</u>	137 <u>77</u>	<1	14 <u>15</u>	4
Maximum (lbs/day)						
Scenario A	16	40 <u>52</u>	190 <u>141</u>	<1	15 <u>16</u>	4
Scenario B	18 <u>16</u>	40 <u>52</u>	190 <u>141</u>	<1	15 <u>16</u>	4
<i>Regional Construction Thresholds</i>	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

lbs/day = pounds per day; 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; SO₂ = sulfur dioxide; CO = carbon monoxide

¹ The 327 Harbor Site is referred to as “327 Harbor” in the CalEEMod outputs.

² “Overlap by year” rows show the maximum daily emissions where development of Phases overlap. Specifically, during years 2024 and 2025 it is anticipated that construction activities will occur on both the 327 Harbor Site as well as within Phase 1 and in years 2034 and 2035 construction activities will occur in both Phases 2 and 3.

Source: See Appendix B

Table 4.2-11 Mitigated Construction and Operational Overlap Emissions – Regional Threshold Comparison

Plan Area ¹	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Scenario A (lbs/day)						
Construction of OSP Specific Plan Site Phases 2 and 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1						
Construction of OSP Specific Plan Site Phases 2 and 3	<u>1615</u>	<u>4052</u>	<u>19091</u>	<1	<u>1516</u>	4
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	20	<u>78</u>	<u>94104</u>	<1	<u>1819</u>	5
Total	<u>3635</u>	<u>4859</u>	<u>284195</u>	<1	<u>3334</u>	9
Construction of OSP Specific Plan Site Phase 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2						
Construction of OSP Specific Plan Site Phase 3	16	<u>3041</u>	<u>13232</u>	<1	<u>89</u>	<u>23</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	<u>4748</u>	<u>1718</u>	<u>226251</u>	<1	47	13
Total	<u>6364</u>	<u>4759</u>	<u>358284</u>	<1	<u>5556</u>	<u>1516</u>
Scenario B (lbs/day)						
Construction of OSP Specific Plan Site Phases 2 and 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1						
Construction of OSP Specific Plan Site Phases 2 and 3	<u>1816</u>	<u>4052</u>	<u>19091</u>	<1	<u>1516</u>	4
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	<u>2324</u>	9	<u>111123</u>	<1	22	6
Total	<u>4140</u>	<u>4961</u>	<u>301214</u>	<1	<u>3738</u>	10
Construction of OSP Specific Plan Site Phase 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2						
Construction of OSP Specific Plan Site Phase 3	12	<u>2641</u>	<u>134138</u>	<1	<u>78</u>	2
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	55	<u>2021</u>	<u>263292</u>	<1	55	15
Total	67	<u>4762</u>	<u>397430</u>	<1	63	<u>1718</u>
Maximum (lbs/day)						
Max Scenario A	<u>6364</u>	<u>4859</u>	<u>358284</u>	<1	<u>5556</u>	<u>1516</u>
Max Scenario B	67	<u>4962</u>	<u>397430</u>	<1	<u>6363</u>	<u>1718</u>
Existing	(18)	(9)	(109)	(<1)	(15)	(4)
Net Scenario A	<u>4546</u>	<u>3850</u>	<u>249175</u>	<1	<u>4041</u>	11
Net Scenario B	<u>4849</u>	<u>3953</u>	<u>288322</u>	<1	48	13
Regional Operational Thresholds	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

lbs/day = pounds per day; 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; SO₂ = sulfur dioxide; CO = carbon monoxide

Note: Totals may be rounded based on the values presented in the CalEEMod outputs.

¹ Note that the 327 Harbor Site is referred to as “327 Harbor” in the CalEEMod outputs.

Source: See Appendix B

Table 4.5-8 Estimated GHG Emissions during Construction

Construction GHG Emissions (MT of CO ₂ e)					
	327 Harbor Site	OSP Phase 1	OSP Phase 2	OSP Phase 3	Total
2023	<u>178,174</u>				<u>178,174</u>
2024	171	<u>2,016,896</u>			<u>2,207,067</u>
2025	7	<u>2,420,219</u>			<u>2,429,226</u>
2026		<u>1,403,379</u>			<u>1,403,379</u>
2027		<u>1,384,360</u>			<u>1,384,360</u>
2028		<u>1,572,514</u>			<u>1,572,514</u>
2029		<u>1,649,577</u>			<u>1,649,577</u>
2030		<u>1,668,598</u>			<u>1,668,598</u>
2031			<u>2,454,507</u>		<u>2,454,507</u>
2032			<u>1,580,524</u>		<u>1,580,524</u>
2033			<u>1,454,430</u>		<u>1,454,430</u>
2034			<u>1,688,630</u>	<u>2,122,794</u>	<u>3,810,424</u>
2035			<u>893,837</u>	<u>1,477,906</u>	<u>2,370,743</u>
2036				<u>1,573,970</u>	<u>1,573,970</u>
2037				<u>1,065,645</u>	<u>1,065,645</u>
Total					<u>26,794,912</u>
Amortized over 30 years					<u>893,697</u>

OSP = One San Pedro Specific Plan Site; MT of CO₂e = metric tons of carbon dioxide equivalent

Source: See Appendix B

Table 4.5-9 Combined Annual GHG Emissions

Emission Source	Project Emissions (MT of CO ₂ e per year)	
	Scenario A	Scenario B
Area	28	28
Electric ¹	1088	1,148
Mobile	9,670	9,533
Solid Waste	325	326
Water	78	78
Amortized Construction	<u>893,697</u>	<u>893,697</u>
PDF GHG-1: PV Solar	(156)	(165)
PDF GHG-2: EV Charging Stations	(6,013)	(6,035)
PDF GHG-3: TDM Measures	(206)	(206)
Operational Emissions	<u>5,634,684</u>	<u>5,524,574</u>
Existing Emissions	3,108	3,108
Net Emissions	<u>2,526,403</u>	<u>2,415,332</u>

MT of CO₂e = metric tons of carbon dioxide equivalent; () = negative values

¹ Additional regulatory reductions account for the increased RPS requirements which reduces carbon intensity of electricity usage.

Source: Appendix B

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

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Scenario A					
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	67	13	1	<1
OSP Specific Plan Site Phase 3	2	53	116	1	<1
327 Harbor Site + OSP Specific Plan Site Phase 1	<u>1</u>	<u>910</u>	13	1	<11
OSP Specific Plan Site Phase 2 + OSP Specific Plan Site Phase 3	32	<u>95</u>	<u>810</u>	<u>1</u>	1 <u><1</u>
Scenario B					
<u>327 Harbor Site</u>	<u><1</u>	<u>1</u>	<u>1</u>	<u><1</u>	<u><1</u>
<u>OSP Specific Plan Site Phase 1</u>	<u>1</u>	<u>9</u>	<u>13</u>	1	<u><1</u>
<u>OSP Specific Plan Site Phase 2</u>	<u>2</u>	<u>7</u>	<u>13</u>	1	<u><1</u>
<u>OSP Specific Plan Site Phase 3</u>	<u>2</u>	<u>3</u>	<u>6</u>	1	<u><1</u>
<u>327 Harbor Site + OSP Specific Plan Site Phase 1</u>	<u><1</u>	<u>10</u>	<u>13</u>	1	<u><1</u>
<u>OSP Specific Plan Site Phase 2 + OSP Specific Plan Site Phase 3</u>	<u>2</u>	<u>5</u>	<u>10</u>	<u>1</u>	<u><1</u>
Overall Project					
Maximum Annual Emissions	32	<u>99.5</u>	<u>813</u>	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; 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					

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	<u>32</u>	<u>95</u>	<u>4810</u>	1	<u>4<1</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	4	1	17	3	1
Total	6	<u>107</u>	<u>3527</u>	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	<u>53</u>	<u>116</u>	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	8	3	41	8	2
Total	11	<u>86</u>	<u>5247</u>	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	<u>32</u>	<u>95</u>	<u>4810</u>	1	<u>4<1</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	4	2	20	4	1
Total	7	<u>107</u>	<u>3830</u>	5	<u>21</u>
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	<u>53</u>	<u>116</u>	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	10	4	48	10	3
Total	11	<u>97</u>	<u>5954</u>	11	3
Overall Project (tons/year)					
Max Scenario A	11	<u>107</u>	<u>5247</u>	9	2
Max Scenario B	11	<u>107</u>	<u>5954</u>	11	3
Existing	3	2	17	3	1
Net Scenario A	7	<u>85</u>	<u>3530</u>	<u>67</u>	<u>42</u>
Net Scenario B	8	<u>95</u>	<u>4237</u>	8	2
De Minimis 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

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

Source: See Appendix B

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

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Scenario A					
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	23	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	34	17	1	<1
Scenario B					
<u>327 Harbor Site</u>	<u><1</u>	<u><1</u>	<u>1</u>	<u><1</u>	<u><1</u>
<u>OSP Specific Plan Site Phase 1</u>	<u>1</u>	<u>2</u>	<u>13</u>	<u>1</u>	<u><1</u>
<u>OSP Specific Plan Site Phase 2</u>	<u>2</u>	<u>3</u>	<u>12</u>	<u>1</u>	<u><1</u>
<u>OSP Specific Plan Site Phase 3</u>	<u>1</u>	<u>2</u>	<u>10</u>	<u>1</u>	<u><1</u>
<u>327 Harbor Site and OSP Specific Plan Site Phase 1</u>	<u><1</u>	<u>2</u>	<u>13</u>	<u>1</u>	<u><1</u>
<u>OSP Specific Plan Site Phases 2 and 3</u>	<u>2</u>	<u>4</u>	<u>17</u>	<u>1</u>	<u><1</u>
Overall Project					
Maximum Annual Emissions	2	34	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; 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					

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	34	17	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	3	1	16	3	1
Total	5	45	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	56	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	34	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	56	54	11	3
Overall Project (tons/year)					
Max Scenario A	10	56	48	9	2
Max Scenario B	11	56	54	11	3
<i>Existing</i>	3	2	17	3	1
Net Scenario A	7	34	31	67	42
Net Scenario B	8	4	37	8	2
<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

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 8	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

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	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	54	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

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

Source: See Appendix B

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 11	1	<1
OSP Specific Plan Site Phase 2	1	2	8	1	<1
OSP Specific Plan Site Phase 3	1	2 3	8 9	1	<1
327 Harbor Site + OSP Specific Plan Site Phase 1	<1	2	11 12	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	23	1112	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

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 3	8 9	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	6	3	35	7	2
Total	7	56	43	8	2
Max Emissions	7	5 6	43	8	2
<i>Existing</i>	3	2	17	3	1
Net Emissions	4	4	26	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
 Note: Totals may not add up correctly due to rounding.
 Source: See Appendix B

Comment 3.3

Based on the Air Quality Section of the Draft EIR/EIS, the proposed project construction and the overlapped construction and operation activities result in a significant impact on NO_x emissions, and the operation results in a significant impact on VOC emissions when compared to the South Coast AQMD Regional Air Quality Significant Thresholds. Thus, the Lead Agency proposes mitigation measures AQ-1 for construction and AQ-2 for operation to minimize the potentially significant impacts related to criteria pollutant emissions. Mitigation measure AQ-1 requires the use of off-road construction equipment that meets the U.S. EPA Tier 4 final standard or at a minimum of Tier 3 standards. However, as mentioned in the Project Description, the construction of the OSP Specific Plan Site could span approximately 14 to 20 years. It is reasonably foreseeable that Tier 4 Final may not be the cleanest technology when construction occurs later. In addition, according to the California Air Resource Board (CARB) Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027/2028 and the Governor's Executive order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035, wherever feasible. South Coast AQMD staff recommends that the Lead Agency visit the CARB website regarding the Potential Amendments to the Diesel Engine Off-road Emission Standards: Tier 5 Criteria Pollutants and CO₂ Standards for more information.

Additionally, during the construction activities such as soil export or material delivery, all heavy-duty trucks entering the construction site should be model 2014 or newer. Further, all heavy-duty haul trucks should meet CARB's lowest optional low NO_x standard. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the mitigation measure AQ-1 to commit to using the cleanest technology for construction during the long-term construction period, if available and feasible, require all heavy-duty trucks be model year 2014 or newer, and includes the revision in the Final EIR/EIS. If the revisions are not included in the Final EIR/EIS, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Response 3.3

The inclusion of additional measures is not necessary, as the mitigation as written already reduces air pollutant emissions to a less than significant level. Additionally, the incorporation of the suggested conditions is impractical and speculative for a long-term project, as the requirement to upgrade construction equipment fleets mid-construction could result in new contractors needing to be hired or otherwise be disruptive to the construction schedule as older equipment is forced to be replaced by newer equipment and/or new contractors are settled into place. The project would, however, be required to comply with State and regulatory requirements as they change during the course of construction. Therefore, while the mitigation is not being revised at this time, new regulatory requirements during the course of construction activities may require the use of newer technologies and the project would comply with any such regulatory requirements. No changes to the Draft EIR/EIS are required.

Comment 3.4

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the proposed project's air quality impacts, and in addition to AQ-1, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR.

- Maintain equipment maintenance records for the construction portion of the proposed project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each piece of equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from the completion of construction.
- Require the use of ZE or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. Since the construction schedule of the proposed project extends into 2023, it is reasonable to assume that 2010 model-year trucks will become more widely available commercially. Additionally, the proposed project will include an estimated 36,529 haul trips during construction, contributing to the proposed project's significant and unavoidable construction NOx emissions. Therefore, South Coast AQMD staff recommends that the Lead Agency, at a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate. Additionally, the Lead Agency should require that operators maintain records of all trucks associated with the proposed project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the proposed project meets the minimum 2010 model-year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.
- Restrict non-essential diesel engine idle time to not more than five consecutive minutes or another timeframe as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, include the idling requirement in the training materials for drivers, operators, and vendors, and post signs at the entry of the construction site and throughout the proposed project site stating that idling longer than five minutes is not permitted.

Response 3.4

As discussed in Response to Comment 3.3 above, the inclusion of additional measures is not required because the mitigation as written would reduce emissions to a less than significant level. Additionally, the requirements that equipment be tuned and maintained in compliance with manufacturer's specifications as well as engine idling restrictions are both regulatory requirements that the project would be subject to and comply with. Inclusion of regulatory requirements as mitigation is not a requirement under CEQA, as it is understood, as well as specifically stated in the analysis on page 4.2-48 of the Draft EIR/EIS, that the project would be subject to and comply with all regulatory requirements. No changes to the Draft EIR/EIS are required.

Comment 3.5

If the implementation of the proposed project would require the use of new stationary equipment (e.g., internal combustion engines), permits from South Coast AQMD are required. The Final EIR/EIS should include a discussion on any existing and new stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the proposed project. Any assumptions used for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the proposed project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Response 3.5

The proposed project would not include any stationary equipment, such as diesel generators, and no SCAQMD permits would be required. If a need for the new stationary equipment arises in the future, SCAQMD will be contacted for the permit requirements.

Comment 3.6

Pursuant to California Public Resources Code section 21092.5(a) and CEQA Guidelines section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein, at least ten (10) days prior to the certification of the Final EIR.²⁰ In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with the recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record must be provided to explain why specific comments and recommendations are not accepted.

Response 3.6

The written responses to the above comments include explanations as to why certain recommendations were not accepted. The responses to SCAQMD's comments will be provided to SCAQMD staff at least 10 days prior to certification of the Final EIR/EIS.

Comment Letter 4

COMMENTER: Ray Regalado, President, Northwest San Pedro Neighborhood Council

DATE: August 18, 2023

Comment 4.1

The EIR should base their population increases on the average household size for Rancho San Pedro (3.0) rather than the average household size for all of San Pedro (2.4). Rancho San Pedro has a significantly higher household size than the rest of San Pedro. 41.4% of households at Rancho are 3-5 persons compared to 34.6% for San Pedro as a whole and 11.2% are 6+ persons while San Pedro has 4.3%. The average size for Rancho San Pedro (3.0) should be used in the FEIR. This will impact the analysis in most of the sections of the EIR.

Response 4.1

The proposed project includes a mix of affordable and market rate units, as described in Section 2, *Project Description*, of the Draft EIR/EIS, and would result in a net increase of up to 564 affordable rental units, 480 market rate rental units, 45 affordable homeownership units, and 32 market rate ownership units on the project site. It would be reasonable to assume that the additional affordable rental units on the project site may have a similar average household size as the existing Rancho San Pedro units. It would be speculative to assume that the market rate and ownership units on the OSP Specific Plan Site would vary substantially from the overall socioeconomic and demographic profile of San Pedro as a whole, and as such, the San Pedro average household size of 2.42 persons per household remains applicable for those units. As a result, the estimated net population growth on the project site is amended to 3,041 as compared to 2,715.³

Using this new estimate, the proposed project's contribution to population growth would still account for approximately 0.3 percent of the population growth projected for the City of Los Angeles by 2045 (872,553 new residents as noted on page 4.10-2 of the Draft EIR/EIS), assuming that all new residents of the project would relocate from outside the city.⁴ Therefore, the proposed project would not generate new households or residents in exceedance of the planned growth for the city and the conclusions of Section 4.10, *Population and Housing*, of the Draft EIR/EIS remain unchanged. Section 4.10, *Population and Housing*, of the Draft EIR/EIS is amended to reflect the new population growth estimates, as shown under "Revisions to the Draft EIR/EIS" below.

Other environmental topics that could potentially be affected by the estimated population growth include public services, recreation, utilities and service systems, transportation, air quality, noise, and GHG emissions. Utilizing the new estimated net population growth for the project, the proposed project would still result in a less than one percent increase in the service populations for Los Angeles Fire Department (LAFD) and Los Angeles Police Department (LAPD)⁵, and the service ratio for the LAPD Harbor Community Division would remain at 1.52 officers per 1,000 residents⁶.

³ 564 affordable rental households (3.0 persons per household) = 1,692 persons
480 market rate rental households (2.42 persons per household) = 1,162 persons
77 ownership households (2.42 persons per household) = 187 persons
Total population = 3,041

⁴ 3,041 residents/872,553 residents = 0.00348 or 0.3 percent

⁵ The service population for LAFD and LAPD is the number of residents in the City of Los Angeles (3,819,538 residents in 2022 as noted on page 4.11-21 of the Draft EIR/EIS). 3,041 residents/3,819,538 = 0.00079 or a 0.08 percent increase in population.

⁶ As discussed on page 4.11-30 of the Draft EIR/EIS, based on the current population of 171,000 residents and 264 sworn police within the division, the Harbor Community Division currently has an officer ratio of approximately 1.54 officers for every 1,000 residents. The

Therefore, the conclusions of Section 4.11, *Public Services*, and Section 7.4.11, *Environmental Impact Statement: Public Services*, of the Draft EIR/EIS related to police and fire protection services remain unchanged. Section 4.11, *Public Services*, and Section 7.4.11, *Environmental Impact Statement: Public Services*, of the Draft EIR/EIS are amended to reflect the new population growth estimates, as shown under “Revisions to the Draft EIR/EIS” below. The commenter provides specific comments related to schools and libraries, and those topics are addressed under Responses 4.3 through 4.6.

Regarding parks and open space, the proposed project would still be consistent with the LAMC Section 12.21 G and 12.33 G open space requirements, which establish open space requirements based on unit counts not on population number as described in pages 4.12-19 through 4.12-21 of the Draft EIR/EIS. Based on an increase of 3,041 residents on the project site, as compared to 2,715, and the City of Los Angeles Public Recreation Plan goals, the proposed project would generate demand for an additional 6.1 acres (compared to 5.43 acres with the previously used population number) each of neighborhood and community parkland and 18.2 acres of regional parkland (compared to 16.29 acres with the previously used population number), for a total of 30.4 acres (compared to 27.15 acres with the previously used population number) of parkland within San Pedro. As with the analysis provided in pages 4.12-21 and 4.12-22 of the Draft EIR/EIS, although the proposed project would not meet these goals, the Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. As concluded in Section 4.12, *Recreation*, of the Draft EIR/EIS, the proposed project would provide adequate on-site recreational amenities to serve the project residents, and the proposed project would not result in substantial deterioration of park and recreational facilities or the need for new or expanded park and recreational facilities. Even with the adjusted population estimate, the conclusions of Section 4.12, *Recreation*, and Section 7.4.12, *Environmental Impact Statement: Recreation*, of the Draft EIR/EIS would remain unchanged and project impacts would remain less than significant. Section 4.12, *Recreation*, and Section 7.4.12, *Environmental Impact Statement: Recreation*, of the Draft EIR/EIS are amended to reflect the new population growth and park demand estimates, as shown under “Revisions to the Draft EIR/EIS” below.

In regard to utilities and service systems, the proposed project’s estimated water use (page 4.15-16 of the Draft EIR/EIS), wastewater (page 4.15-27 of the Draft EIR/EIS) and solid waste (page 4.15-41 of the Draft EIR/EIS) generation, and electricity and natural gas use (page 4.15-47 of the Draft EIR/EIS) are based upon standard, accepted generation rates on a per unit basis, not based on population. These rates continue to be applicable to the proposed project, and the conclusions of Section 4.15, *Utilities and Service Systems*, of the Draft EIR/EIS remain unchanged.

Increased residential growth on the project site could result in increased vehicle trips and associated operational air pollutant and GHG emissions and noise. However, as described in pages 29 through 30 of the Transportation Assessment (Draft EIR/EIS Appendix I), the estimated vehicle trips generated by the residential units of proposed project are based on the number and types of units, not population, utilizing the rates and methodology established by LADOT. Therefore, the anticipated vehicle trips and vehicle miles traveled (VMT) generated by the proposed project would remain consistent with those reported in the Draft EIR/EIS, and no changes to the associated air pollutant and GHG emissions or operational noise analysis would be required. Furthermore, estimated air pollutant and GHG emissions associated with other operational sources, such as area sources and energy use, are based on standard CalEEMod assumptions based on unit type and rates

addition of 3,041 residents would increase the service population of the Harbor Community Division to 174,041, and the officer ratio would be reduced to 1.52 officers per 1,000 residents.

(refer to the CalEEMod inputs and results in the Draft EIR/EIS Appendix B). Therefore, the analysis and conclusions of Section 4.2, *Air Quality*, Section 4.5, *Greenhouse Gas Emissions*, and Section 4.13, *Transportation*, of the Draft EIR/EIS remain unchanged.

Revisions to the Draft EIR/EIS

SECTION 2, PROJECT DESCRIPTION

Page 2-10 of the Draft EIR/EIS is revised as follows:

The proposed project would generate an anticipated net increase of approximately ~~114~~141 residents on the 327 Harbor Site.

Page 2-18 of the Draft EIR/EIS is revised as follows:

The proposed project would generate an anticipated net increase of approximately ~~2,602~~2,900 residents and 314 employees on the OSP Specific Plan Site.

SECTION 4.10, POPULATION AND HOUSING

Page 4.10-2 of the Draft EIR/EIS is revised as follows:

The OSP Specific Plan Site is developed with 478 residential units, while the 327 Harbor Site is vacant and undeveloped. Based on the ~~San Pedro Community Plan Area (CPA)~~ current Rancho San Pedro household demographics of approximately ~~2.42~~ 3.0 persons per residential unit, the OSP Specific Plan Site has approximately ~~1,157~~ 1,434 residents (HACLA 2020). It is noted that the San Pedro Community Plan Area (CPA) has a persons per residential unit ratio of 2.42 (City of Los Angeles 2021a).

Page 4.10-16 of the Draft EIR/EIS is revised as follows:

The proposed project's residential population was calculated based on the San Pedro CPA household demographics of approximately 2.42 persons per residential unit for market rate rental and the homeownership units (City of Los Angeles 2021a). The residential population for replacement units and affordable rental units was calculated based on the Rancho San Pedro household demographics of 3.0 persons per household (HACLA 2020).

Page 4.10-18 of the Draft EIR/EIS is revised as follows:

Based on the estimate of 3.0 persons per household at Rancho San Pedro and the 2020 estimate of 2.42 persons per household in the San Pedro CPA, the proposed project would provide housing for an estimated ~~3,872~~4,475 residents (HACLA 2020; City of Los Angeles 2021a)⁷. The project would include replacement housing for the existing 478 housing units on the OSP Specific Plan Site; therefore, the proposed project would result in an estimated net increase of ~~2,715~~3,041 residents on the project site⁸.

Page 4.10-23 of the Draft EIR/EIS is revised as follows:

⁷ ~~1,600 households x 2.42 persons per household = 3,872 persons~~1,042 affordable rental households (3.0 persons per household) = 3,126 persons

480 market rate rental households (2.42 persons per household) = 1,162 persons

77 ownership households (2.42 persons per household) = 187 persons

Total population = 4,475

⁸ ~~3,872,475~~ persons – 478 households (~~2,423.0~~ persons per household) = ~~2,715~~3,041 persons

Table 4.10-4 Cumulative Population, Housing, and Employment

Project No.	Project Location ¹	Land Use ¹	Size ¹	Housing (du) ¹	Population ²	Employment ³
1	921 South Beacon Street	Apartments	100 du	100	242	--
		Commercial	14,717 sf	--	--	594
2	544 South Pacific Avenue	Hotel	80 rooms	--	--	40
3	444 West 5th Street	Apartments	106 du	106	257	--
		Retail	2,000 sf	--	--	4
4	511 South Harbor Boulevard	Apartments	137 du	137	332	--
		Retail	394 sf	--	--	1
		Restaurant	2,129 sf	--	--	9
5	111 North Harbor Boulevard	Apartments	120 du	120	290	--
		Retail	4,166 sf	--	--	8
6	505 South Centre Street	Apartments	300 du	300	726	--
		Retail	13,038 sf	--	--	26
		Restaurant	12,441 sf	--	--	50
7	222 West 6th Street	Office space (removed)	262,679 sf	--	--	(1,051)
		Apartments	228 du	228	552	--
		Retail	15,000 sf	--	--	30
8	420 West 9th Street	Apartments	56 du	56	136	--
9	457 West 7th Street	Restaurant	3,812 sf	--	--	15
10	625 South Beacon Street	Mixed Use	281 du	281	680	--
		Restaurant	2,316 sf	--	--	9
11	319-345 Beacon Street and 117 O'Farrell Street	Apartments	89 du	89	215	--
12	456-462 West 9th Street and 457-473 West 8th Street	Apartments	91 du	91	220	--
Cumulative Projects Total				1,508	3,649	(800)
Net proposed project				1,122	153,041	314
Cumulative Project Plus proposed project Total				2,630	<u>646,690</u>	(486)

sf = square feet; du = dwelling units; () = negative value

¹ Cumulative project details were sourced from the Memorandum of Understanding (MOU) prepared for the project by Fehr & Peers in June 2022 (see Appendix I of this EIR/EIS), as described in Section 3.4, *Cumulative Development*.

² Based on a household rate of 2.42 persons per household in the San Pedro CPA (City of Los Angeles 2021a).

³ Based on employee generation rates from the LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Table 1, including: General Retail = 2/1,000 sf; Restaurant (high-turnover sit-down and quality restaurants) = 4/1,000 sf; Hotel = 0.5/room; General Office = 4/1,000 sf (LADOT 2020).

⁴ Details regarding the type of commercial use for this cumulative project are not available. Therefore, commercial uses were conservatively modeled using the restaurant employee generation rate, which is higher than general retail.

Page 4.10-24 of the Draft EIR/EIS is revised as follows:

The proposed project, along with the cumulative projects, would result in 2,630 new housing units, 6,364,690 new residents, and 486 fewer employees than under current conditions.

In addition, the following citation is added to Section 8.11, *References: Population and Housing*, of the Draft EIR/EIS:

HACLA. 2020. One San Pedro Transformation Plan. February 28, 2020.

SECTION 4.11, PUBLIC SERVICES

Page 4.11-16 of the Draft EIR/EIS is revised as follows:

The proposed project would result in an estimated total residential population of approximately ~~3,8724,475~~ people, which represents a net increase of ~~2,7153,041~~ residents compared to existing uses.

Page 4.11-19 of the Draft EIR/EIS is revised as follows:

The proposed project combined with cumulative development would result in a net increase of ~~6,3646,690~~ residents in the project area, as well as a reduction of 486 employees.

Page 4.11-30 of the Draft EIR/EIS is revised as follows:

The proposed project would result in an estimated total residential population of approximately ~~3,8724,475~~ people, which represents a net increase of ~~2,7153,041~~ residents compared to existing uses.

Page 4.11-32 of the Draft EIR/EIS is revised as follows:

The proposed project combined with cumulative development would result in a net increase of ~~6,3646,690~~ residents in the LAPD Harbor Community Division, as well as a reduction of 486 employees.

Page 4.11-52 of the Draft EIR/EIS is revised as follows:

Therefore, the proposed project would result in a net increase of ~~2,7153,041~~ residents compared to existing uses.

According to LAPL, the San Pedro Regional Branch Library service population is approximately 82,604 persons. With the addition of the project's ~~2,7153,041~~ estimated new residents, the service population of the San Pedro Regional Branch Library would increase to ~~85,31985,645~~ persons, or an increase of approximately ~~3.33.7~~ percent.

Page 4.11-52 of the Draft EIR/EIS is revised as follows:

The proposed project combined with cumulative development would result in a net increase of ~~6,3646,690~~ residents in San Pedro, as well as a reduction of 486 employees. The proposed project along with cumulative projects would increase the service population of the San Pedro Regional Branch Library to ~~88,96889,294~~, or by approximately ~~8.48.1~~ percent.⁹

SECTION 4.12, RECREATION

Page 4.12-14 of the Draft EIR/EIS is revised as follows:

⁹ There was a miscalculation in this sentence, and the increase in service population should have been listed as 7.7 percent.

Therefore, the proposed project would result in an estimated total residential population of approximately 3,8724,475 people, which represents a net increase of 2,7153,041 residents compared to existing uses.

Page 4.12-21 of the Draft EIR/EIS is revised as follows:

Based on the net increase of 2,7153,041 residents associated with the proposed project and the Public Recreation Plan standards, the project would generate demand for an additional 5.436.1 acres each of neighborhood and community parkland and 16.2918.2 acres of regional parkland, for a total of 27.1530.4 acres of parkland within San Pedro.

SECTION 5, OTHER CEQA

Page 5-7 of the Draft EIR/EIS is revised as follows:

Based on the estimate of 3.0 persons per household at Rancho San Pedro and the 2020 estimate of 2.42 persons per household in the San Pedro Community Plan Area, the proposed project would result in an estimated net increase of 2,7153,041 residents on the project site (City of Los Angeles 2021)¹⁰.

SECTION 7, ENVIRONMENTAL IMPACT STATEMENT

Page 7-133 of the Draft EIR/EIS is revised as follows:

As described in Section 4.11, *Public Services*, the proposed project Alternative would result in a net increase of approximately 2,7153,041 residents, 314 employees, and 453 students compared to existing uses, which would incrementally increase the demand for public services in the project vicinity.

Page 7-141 of the Draft EIR/EIS is revised as follows:

The proposed project Alternative would increase the number of people on the project site by 2,7153,041 residents and 314 employees compared to existing uses, which could increase demand for existing recreational resources in the project area.

Page 7-190 of the Draft EIR/EIS is revised as follows:

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 2,7153,041 new residents.

Page 7-198 of the Draft EIR/EIS is revised as follows:

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 2,7153,041 new residents.

¹⁰ 1,122 households x 2.42 persons per household = 2,715 persons - 564 affordable rental households (3.0 persons per household) = 1,692 persons
480 market rate rental households (2.42 persons per household) = 1,162 persons
77 ownership households (2.42 persons per household) = 187 persons
Total population = 3,041

Comment 4.2

The DEIR student generation rate would place Barton Hill at 69 students over capacity and San Pedro High School at 136 students over capacity. These numbers are probably low since the DEIR used San Pedro wide student averages rather than the student generation rates for Rancho San Pedro which are higher than for San Pedro as a whole. According to the One San Pedro Transformation Plan, the population of Rancho San Pedro is significantly younger than the population of San Pedro as a whole with 41.2% of RSP under 18 while San Pedro only has 22.9% under 18. This should be corrected in the FEIR.

Further, when the student generation rates for the additional 12 nearby projects are included, the DEIR estimates that Barton Hill would be 630 students over capacity, Dana 131 students over capacity, and San Pedro High School a whopping 444 students over capacity.

The DEIR relies on the payment of the student generation fee as sufficient mitigation. It also states that no new schools are planned. Considering that the cumulative impact on Barton Hill would result in more than twice the number of students as the capacity of Barton Hill, it would appear that a new elementary school would be needed. Furthermore, the overcrowding at San Pedro High School must be addressed. While the law appears to be that the school fees satisfy the environmental impact requirement, it is well known that they do not provide sufficient funding for needed classroom space. The applicant should advocate for the school fees to be designated for San Pedro classrooms.

Response 4.2

The analysis presented in Section 4.11.3, *Public Services- Schools*, of the Draft EIR/EIS utilizes student generation rates based on the Los Angeles Unified School District (LAUSD) School Fee Justification Study to determine the estimated number of elementary, middle school, and high school students generated by the proposed project (page 4.11-42 of the Draft EIR/EIS). This is consistent with the accepted methodology utilized in other EIRs prepared by the City of Los Angeles.¹¹ Furthermore, as stated on page 4.11-43 of the Draft EIR/EIS, pursuant to Government Code Section 65995(h), the payment of development fees fully reduces all project-related school impacts to less than significant levels. Thus, even if the student generation rates were modified, the payment of development fees would reduce the impact to a level of insignificance. Therefore, no changes to the Draft EIR/EIS are required in response to this comment. The request for the project Applicant to advocate for development fees to be designated for San Pedro schools is noted, and this comment will be provided to City decision-makers for consideration.

Comment 4.3

The DEIR states that the surrounding schools may have capacity available but does not provide any statistical information about their current capacity and current enrollments. Also, alternative methods of furnishing adequate facilities for students should be provided in the FEIR such as advocating for the use of additional school bond funds in San Pedro and inclusion of classrooms on-site.

¹¹ See <https://planning.lacity.org/development-services/eir> for other City of Los Angeles EIR examples.

Response 4.3

The Draft EIR/EIS mentions the existence of nearby non-LAUSD schools for informational purposes but does not base the significance determination on the capacities or enrollments of these schools. As described on page 4.11-43 of the Draft EIR/EIS, pursuant to Government Code Section 65995(h), the payment of development fees fully reduces all project-related school impacts to less than significant levels, and the proposed project would not result in significant impacts to schools. The request for the project Applicant to advocate for use of additional school bond funds to be designated for San Pedro schools is noted, and this comment will be provided to City decision-makers for consideration.

Comment 4.4

The DEIR also fails to address adult education needs.

Response 4.4

Although adult education is not specifically addressed in the Draft EIR/EIS, pursuant to Government Code Section 65995(h), the payment of development fees fully reduces all project-related school impacts to less than significant levels. This includes impacts related to adult education, and as described in pages 4.11-40 through 4.11-46 of the Draft EIR/EIS, the proposed project would not result in significant impacts to schools.

Comment 4.5

Finally, the DEIR fails to address other costs of student increases such as the need for additional crossing guards, pedestrian control, and after school programs. One third of Rancho San Pedro residents participating in a survey conducted by One San Pedro (11/2018) indicated that they felt their children were unsafe walking to and from schools or bus stops. The Rancho San Pedro Transformation Plan states that they are concerned about speeding cars, inconsiderate drivers, and a lack of marked crosswalks and stoplights. This should be addressed in the FEIR.

Response 4.5

As discussed on page 4.11-43 of the Draft EIR/EIS, pursuant to Government Code Section 65995(h), the payment of development fees fully reduces all project-related school impacts, including impacts such as the need for additional crossing guards and after school programs, to less than significant levels. Furthermore, the proposed project would implement traffic safety improvements that address community concerns, including implementing a new Safe Routes to School program, installing new crosswalks and traffic signals, and installing traffic calming features, as detailed in pages 2-25 through 2-28 of the Draft EIR/EIS.

Comment 4.6

The DEIR indicates that the project would result in a 3.3% increase in the population served by the library and the cumulative impact would be an 8.4% increase, yet proposes no mitigation measures. In a survey conducted by One San Pedro (11/2018), 47% of residents said that a library was very needed and an additional 28% said it was somewhat needed. At a minimum the Specific Plan should include a satellite library with area for story time and a study hall and/or a plan for regular transportation to the existing library which is badly in need of an upgrade.

Response 4.6

As discussed on page 4.11-52 of the Draft EIR/EIS, the San Pedro Regional Branch Library meets the Los Angeles Public Library Branch Facilities Plan's criteria for adequate size and population characteristics for regional branch facilities and the proposed project's contribution to the service population of this library would be negligible. Furthermore, the proposed project would include universal Wi-Fi and other features that would further offset library demand, such as a workforce development center, a youth center, community rooms, business incubator, and nonprofit offices. These spaces would provide options for on-site computer and Wi-Fi access for residents, as well as spaces for studying and youth and adult programming. Additionally, the project site is within one mile of the San Pedro Regional Branch Library and the library is accessible by the existing LADOT San Pedro DASH route and Route 142 and Metro J-Line 910/950, Line 205, and Line 246 bus routes serving the project site. The proposed project would add a new transit hub to 1st Street, with improved bus stop facilities, facilitating convenient and pleasant access to public transit for project residents and the surrounding community. As discussed on pages 4.11-52 and 4.11-53 of the Draft EIR/EIS, the proposed project would result in less than significant impacts to libraries.

Comment 4.7

Water is a limited resource and the unknowns around availability make it difficult to plan. In light of the requirement that the City plan for 473,000 additional housing units over the next 8 years, the applicant should ask Los Angeles Department of Water and Power (LADWP) how they plan to address future water needs.

Response 4.7

As discussed in pages 4.15-20 and 4.15-21 of the Draft EIR/EIS, LADWP prepared and adopted a Water Supply Assessment (WSA) for the proposed project and determined that adequate water supplies are available to serve the proposed project along with the existing and anticipated future demands on LADWP.

Comment 4.8

The project should be required to provide solar energy to the extent feasible.

Response 4.8

As described on page 4.5-39 of the Draft EIR/EIS, the proposed project would include rooftop solar panels that would produce a minimum of 15 percent of the proposed project's electricity demand.

Comment 4.9

The DEIR states that archaeological resource impacts are "less than significant with mitigation incorporated". The determination of "less than significant" does not seem appropriate given that the waterfront and nearby streams are cited as named village sites in oral tradition and early Spanish accounts. While the DEIR does include an Archaeological Testing Plan (ATP) and outline procedures to mitigate impacts on archaeological resources, the fact that it doesn't acknowledge the likely presence of such resources suggests that they may not have looked too hard for evidence in preparation of the DEIR, and, if they anticipate no significant findings, they may not be too inclined to monitor closely for their occurrence.

The DEIR cites as mitigation measures the employment of an archaeologist meeting Society for California Archaeology standards, which include a graduate degree in archaeology, anthropology, or a "closely related field," as well as some level of prior work experience. Given the wiggle-room allowed by phrases like "closely related field" the FEIS/EIR should specify the standards they plan to adhere to for technical monitors.

Response 4.9

Pages 4.3-18 through 4.3-21 of the Draft EIR/EIS, include information about the known archaeological resources within the project site and vicinity based on the results of the California Historical Resources Information System records search, background research, archaeological pedestrian field survey, and the Extended Phase I and Phase II archaeological investigations completed for the project. Pages 4.14-3 through 4.14-10 discuss the potential for the presence of unknown archaeological resources of Native American origin. Section 4.3, *Cultural Resources*, of the Draft EIR/EIS notes on page 4.3-29 that "there are six Gabrielino Villages located in the general vicinity of the study area, including one (*Xoyuunga* village) that most ethnographic maps and descriptions place just inside the study area or immediately adjacent to the study area." Both Section 4.3, *Cultural Resources*, and Section 4.14, *Tribal Cultural Resources*, of the Draft EIR/EIS acknowledge and address the potential for unknown buried archaeological and tribal cultural resources to be present on the project site, and mitigation measures are included that require a Worker's Environmental Awareness Training on archaeological sensitivity, archaeological and Native American monitoring, and proper procedures to follow in the event that such resources are uncovered during project construction. The mitigation measure language included in pages 4.3-30 through 4.3-32 of the Draft EIR/EIS is industry standard and widely accepted language and was determined to reduce the potential impacts to archaeological resources to a less-than-significant level.

Comment 4.10

Procedures for site monitoring by both major organizations representing the Tongva is a sound approach.

Response 4.10

The commenter's agreement with the Tribal Cultural Resources mitigation measures included on pages 4.14-10 through 4.14-12 is appreciated, and this comment will be shared with decision makers for their consideration.

Comment 4.11

The DEIR states that archaeological and paleontological resource impacts are "less than significant with mitigation incorporated". The determination of "less than significant" does not seem appropriate given that excavations for the San Pedro footing of the Vincent Thomas Bridge, not far from the project site, uncovered a substantial trove of Pleistocene and early Holocene fossils, and fossil specimens of *Desmostylus* and other creatures have been found within a few miles.

While the DEIS/EIR outlines procedures to mitigate impacts on paleontological resources, the fact that it doesn't acknowledge the likely presence of such resources suggests that they may not have looked too hard for evidence in preparation of the DEIS/EIR, and, if they anticipate no significant findings, they may not be too inclined to monitor closely for their occurrence.

The DEIS/EIR cites as mitigation measures the employment of a qualified paleontologist meeting standards set by the Society of Vertebrate Paleontology, "preferably" with an MS or PhD in paleontology or geology. Given the wiggle-room allowed by phrases like "preferably," the FEIS/EIR should specify the standards they plan to adhere to for technical monitors.

Response 4.11

Pages 4.4-9 through 4.4-12 of the Draft EIR/EIS include information about the known paleontological resources in the project site vicinity based on a literature review and paleontological resources records search prepared by the Natural History Museum of Los Angeles. Page 4.4-11 of the Draft EIR/EIS notes that "six previously recorded fossil localities within the limits of the project site, as well as an additional five previously recorded localities near the project site from the same geologic units as those found in the project site (Bell 2021)" were identified in the records search. Page 4.4-31 of the Draft EIR/EIS states, "Ground disturbance to this extent would directly disturb geologic units of high paleontological sensitivity and has the potential to damage or destroy scientifically important fossils. As such, project construction could potentially result in significant impacts to paleontological resources." As such, the Draft EIR/EIS discusses that there is high potential for the presence of paleontological resources, and provides an industry standard, widely accepted mitigation measure requiring paleontological monitoring and proper treatment procedures in the event that fossils are unearthed during construction.

Comment Letter 5

COMMENTER: Connell Dunning for Jean Prijatel, Environmental Review Branch Manager, U.S. Environmental Protection Agency (U.S. EPA)

DATE: August 21, 2023

Comment 5.1

The EPA did not identify significant environmental concerns to be addressed in the Final EIS and is providing recommendations to improve the assessment and environmental outcome of the proposed project. The EPA supports the goal of expanding affordable housing supply through use of previously developed property so long as the most sustainable construction and operational practices are implemented. The EPA previously reviewed the Notice of Intent to prepare a Draft EIS for the proposed project and provided scoping comments (May 10, 2021). Our scoping letter recommended the City of Los Angeles, on behalf of the United States Department of Housing and Urban Development, address several issues including fugitive dust controls, children's health, lead and asbestos hazard abatement, and evaluation of environmental justice impacts. We appreciate that the City addressed many of EPA's previous comments and recommend that the project proponents consider our additional recommendations below, regarding air quality, hazardous waste, environmental justice, climate change, and greenhouse gas emissions when preparing the Final EIS. In addition, we encourage the proponents to commit adequate resources for monitoring and compliance with the commitments and mitigation measures included in the Final EIS during the implementation of the proposed project.

Response 5.1

The U.S. EPA's agreement with the conclusions of the Final EIR/EIS is appreciated, and the U.S. EPA's additional recommendations for the Final EIR/EIS are considered and responded to in the following responses. Section 4, *Mitigation Monitoring and Reporting Program*, of the Final EIR/EIS details the lead agencies' commitment to ensuring that the mitigation measures included in the Draft EIR/EIS are implemented and monitored throughout construction and implementation of the proposed project.

Comment 5.2

According to the Draft EIS, the proposed project would be consistent with the goals and policies adopted by the City's General Plan for the reduction of air quality impacts. As stated in Section 4.2, and in Section 7.4.3, 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 Draft EIS states that with the implementation of proposed mitigation measures to reduce construction emissions and operational VOC emissions, the 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.

Construction Impacts

As identified in the Draft EIS, mitigation measures are identified to reduce potential construction-related emissions, including a commitment that mobile off-road construction equipment (wheeled or tracked) greater than 50 horsepower must meet the US 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. The Draft EIS further states that mobile off-road construction equipment less than 50 horsepower used during construction of the project shall be electric or other alternative fuel type and that construction contractors must confirm the ability to supply compliant construction equipment prior to any ground-disturbing and construction activities. Given the poor air quality in the project area, and the length of time anticipated for project construction, EPA recommends continued refinement of commitments to reduce construction impacts over the course of the project construction.

Recommendations: Clearly identify all measures to reduce air quality impacts from the demolition and construction of the proposed project, and incorporate all measures into the Construction Mitigation Plan committed to in Section 7.3.1.2 The EPA recommends the following additional mitigation measures be considered:

- In accordance with Section 2485 of CCR Title 13, limit the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction to five minutes at any location.
- Sufficiently water and securely cover all dirt/soil materials transported off site to prevent excessive amounts of dust.
- Require general contractors to maintain and operate construction equipment in a manner to minimize exhaust emissions.
- Require that all trucks waiting to be filled, or where filling activities would last longer than five minutes, be turned off.
- Ensure the previous requirements are incorporated into applicable request for proposals, bid documents, purchase orders, and contracts.
- Locate diesel engines, motors, and equipment staging areas as far as possible from residential areas and sensitive receptors (schools, daycare centers, and hospitals).
- Reduce construction-related trips of workers and equipment, including trucks, to the extent possible. Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Lease or buy newer, cleaner equipment using a minimum of 75 percent of the equipment's total horsepower.
- Use lower-emitting engines and fuels, including electric, liquified gas, hydrogen fuel cells, and/or alternative diesel formulations.

Response 5.2

As discussed in Response to Comments 3.3 and 3.4 above, the inclusion of additional measures is not necessary because the mitigation as written in the Draft EIR/EIS would reduce emissions to a less than significant level. Neither NEPA nor CEQA requires mitigating to the furthest extent possible if other mitigation sufficiently reduces risk to below significance levels. Additionally, the restriction of idling, site watering, and equipment maintenance are regulatory requirements that the project would be subject to. Inclusion of regulatory requirements as mitigation is not a requirement under NEPA or CEQA, as it is understood, as well as specifically noted on page 4.2-48 of the Draft EIR/EIS, that the proposed project would comply with the regulatory requirements. No changes to the Draft EIR/EIS are required.

Comment 5.3

According to the Draft EIS, the project would incorporate multiple measures to reduce environmental impacts and improve the air quality in the proposed project area, and within new buildings and residences. For example, the Draft EIS indicates that all new residences would be equipped with minimum efficiency reporting value 13 filtration systems to reduce PM10 and PM2.5 emissions by at least 70 percent. We appreciate the air quality mitigation measures included in the Draft EIS and suggest additional measures below.

Recommendations: Clearly identify all measures to reduce adverse air quality impacts impacting future residents and users of the multiple-use project facilities. The EPA recommends the following additional mitigation measures:

- Increase the commitment of electric landscaping equipment use required in contracts for landscaping services from the amount stated in the Draft EIS of 25 percent to be a commitment of 50% or more. This increased requirement is necessary given the existing poor air quality in the area. Add the 50% or more commitment to the Master Development Agreement between Housing Authority of the City of Los Angeles and the project applicant.
- Clearly indicate in the Final EIS if fireplaces are prohibited and state how that prohibition is communicated to future tenants. Although the Draft EIS states a commitment to utilizing electric appliances, the Draft EIS does not disclose whether fireplaces, gas powered or otherwise, would be permitted on the premises.
- Commit to an Indoor Air Quality education campaign to inform future residences and facility users about the importance of best practices in reducing potential adverse air quality in housing.
- Consider participating in “Indoor airPLUS”, a voluntary partnership and labeling program that offers guidance and construction specifications that help improve comfort and indoor air quality for residents, as well as enhance durability and reduce risk for affordable builders and developers (<https://www.epa.gov/indoorairplus/affordable-housing-indoor-airplus>).
- Commit adequate resources for monitoring and compliance with the commitments and mitigation measures included in the Final EIR/EIS during the implementation of the proposed project, including compliance with all federal, State, and local air quality policies.
- Include a strategy and schedule for maintenance of central HVAC systems, with commitments for MERV filter replacement.

Response 5.3

As discussed in Response to Comments 3.3, 3.4, and 5.2 above, the inclusion of additional measures is not necessary because the mitigation as written in the Draft EIR/EIS would reduce air pollutant emissions to a less than significant level. Neither NEPA nor CEQA requires mitigating to the furthest extent possible if other mitigation sufficiently reduces risk to below significance levels.

No fireplaces are planned in the proposed project. As noted on pages 2-47 and 4.5-46 of the Draft EIR/EIS, the project would be consistent with the City of Los Angeles All-Electric Ordinance; all residential portions of the project would be electric only and no natural gas hookups, appliances, or fireplaces would be provided in the residential buildings. Additionally, the proposed project would be subject to SCAQMD Rule 445, which prohibits wood-burning fireplaces and cook-stoves in new development. Natural gas hookups would be available within common areas and commercial uses and there is the potential for natural gas fireplaces in those spaces; however, no natural gas fireplaces are planned at this time.

In regard to the recommendations to participate in campaigns and partnerships to improve indoor air quality, such as Indoor airPLUS, HACLA and the Applicant will consider participating in such campaigns. HACLA and the Applicant are committed to providing healthy housing, as evidenced by the provisioning of electric-only residential units and inclusion of MERV-13 filters for all units. Filter replacements for the multifamily rental units would be maintained through regular building management and maintenance. Future owners of the homeownership units would be responsible for maintaining their HVAC units and would be provided information on best practices in reducing exposure to air pollutants including the maintenance and replacement of MERV filters.

Finally, a MMRP has been prepared as part of the Final EIS/EIR (refer to Section 4, *Mitigation Monitoring and Reporting Program*) that outlines the monitoring and compliance responsibilities for all mitigation measures included in the Final EIR/EIS.

Comment 5.4

We note that Section 7.4.3 of the Draft EIS states that “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 to hazardous air pollutants” (emphasis added), and that, “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.” While the proposed housing development and multiple uses planned for the project area will not be a source of hazardous air pollutants, it is important to understand any potential impacts that future residents may be exposed to due to the project being adjacent to the Port of Los Angeles, a “typical land use that results in exposure of sensitive receptors to hazardous air pollutants”, among other potential impacts. We also note that the Draft EIS states that the greatest cumulative air quality impact would be from the increased traffic volumes from growth within the city, and does not include the Port of Los Angeles as a potential contributor to cumulative air quality impacts.

Recommendations: In the Final EIS, please consider the following recommendations to disclose (and mitigate for) impacts to residences that may result from the One San Pedro and 327 Harbor projects being constructed adjacent to the Port of Los Angeles:

- Include a health risk assessment that analyzes the potential environmental impacts from siting new residences adjacent to the Port of Los Angeles
- Describe the current port-related emissions affecting the project site, and describe port-related emissions anticipated to impact residences and planned sensitive receptors at project completion.
- Identify any additional mitigation measures or funding sources available to reduce port-related impacts.

Response 5.4

The Port of Los Angeles is a currently operating source of air pollution in the air basin. Emissions and risk from activities at the Port of Los Angeles are part of the existing baseline in the area. Based on the SCAQMD’s Facility Information Detail Database (FIND), the nearest stationary sources at the Port of Los Angeles are located over 1,400 feet to the north of the 327 Harbor Site and over 1,600

feet east of the OSP Specific Plan Site (the China Shipping Container Facility).¹² Both of these facilities are outside of the 1,000-foot buffer zone within which California Air Resources Board recommends preparation of a Health Risk Assessment (HRA) for new stationary sources.¹³

Although an HRA is not required for the proposed project, for informational purposes only, it should be noted that two existing HRA's have been completed for uses at the Port of Los Angeles. The China Shipping Container Facility north of State Route 47, approximately 1,500 feet north of the 327 Harbor Site and 2,300 feet northeast of the OSP Specific Plan Site, conducted an HRA in June of 2017 as part of a Supplemental EIR prepared for the existing facility.^{14, 15} The results of this HRA show that unmitigated risk to the OSP Specific Plan Site would be within the 1 in one million risk contour and the 327 Harbor Site would be within the 10 in one million contour. The HRA included mitigation, and mitigated risk levels reduce the health risk from the containers to less than 1 in one million for the OSP Specific Plan Site and to less than 10 in one million for the 327 Harbor Site. The mitigated results at the project site are below the SCAQMD health risk threshold of 10 in one million for cancer risk. The Supplemental EIR was certified in 2019 and the mitigation measures were made a condition of approval for the project.

In addition, the Port of Los Angeles Berths 302-306 Container Terminal Project, located approximately 1.4 miles southeast of the OSP Specific Plan Site and 1.5 miles southeast of the 327 Harbor Site, completed an HRA in 2012 as part of an EIR for the expansion of Berths 302-306.¹⁶ The results of this HRA show that unmitigated risk the OSP Specific Plan Site and the 327 Harbor Site would result in risk levels between 2 and 10 in one million. The mitigated residential risk results map shows the OSP Specific Plan Site and the 327 Harbor Site within the 2 to 5 in one million for cancer risk, below the SCAQMD health risk threshold of 10 in one million. The Final EIR for the Berths 302-306 Container Terminal Project was certified in 2012 and the mitigation measures were made a condition of approval for the project. Although the expansion was approved, it was not implemented. An addendum to the Final EIR was certified in May 2021 that proposed modifications to the project that would result in slightly reduced operational air pollutant emissions, but similar impacts to the original project contemplated in the 2012 Final EIR. The 2021 Addendum carried forward the same mitigation measures as the 2012 Final EIR, which were made conditions of approval as part of the certification of the 2021 Addendum.¹⁷

The Port of Los Angeles has implemented several Clean Air Plans and emissions reduction programs over the last decade to help reduce impacts from port activities. Between 2005 and 2019 the Port of Los Angeles has reduced diesel particulate matter (DPM) emissions by 87 percent.¹⁸ The Port of Los

¹² Facility Information Detail (F.I.N.D). SCAQMD 2023. <https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=70dd0045e66243488b3f1ae32405cc0a>

¹³ Air Quality and Land Use Handbook: A Community Health Perspective. April 2005. <https://sfmohcd.org/sites/default/files/20%20-%20CARB%2C%20Air%20Quality%20and%20Land%20Use%20Handbook%202005.pdf>

¹⁴ Berths 97-109 (China Shipping) Container Terminal Draft Supplemental EIR, SCH#2014101050. June 2017. Appendix B3 Health Risk Assessment. Available: https://kentico.portoflosangeles.org/getmedia/f333925d-8f51-469d-82df-bc2b8ef21009/B3_CS_Appendix_B3_HRA_DSEIR.

¹⁵ Berths 91-109 (China Shipping) Container Terminal Final Supplemental EIR Notice of Determination. October 2019. https://files.ceqanet.opr.ca.gov/204259-8/attachment/YSLUupQJdi9wtJvZL4yXf8p5AQ6utQD-GD_DEvbgvPAUhvEiOKWAlxZ0gmC2AoKXpvVf07Chqd00MEz0

¹⁶ Berths 302 to 306 (APL) Container Terminal Project Final Environmental Impact Statement/Environmental Impact Report. Appendix E. May 2012. Available: <https://kentico.portoflosangeles.org/getmedia/ed9ebe63-eae7-4305-bce5-91765dc86bcf/Appendix-E1-Emissions-GHG>.

¹⁷ Addendum #2 to the Berths 302-306 Container Terminal Project Final EIR. May 2021. Available at: https://kentico.portoflosangeles.org/getmedia/7df953ce-46df-4a12-9c15-9b5062f4fe1e/B302-306_Addendum-2_May-2021

¹⁸ Port of Los Angeles, Port of Los Angeles Continues Clean Air Progress; 2019 Report: Aggressive Clean Air Measures, Innovation and Increased Efficiency Driven Gains. October 2020. Available:

Angeles's 2023 Clean Air Action Plan set goals of reducing DPM by 77 percent. As of 2016 the Port had reduced health risk from port-related operations by 85 percent, surpassing the 2023 goal of 77 percent.¹⁹ The Port of Los Angeles continues to implement new and improved technologies to further reduce health risk and pollutant emissions from port activities. For example, as of January 1, 2020, cruise ships must use electricity at the berth 80 percent of the time they are berthed. Continued implementation of new technologies and more efficient practices will continue to see the reduction of health risk impacts from the Port of Los Angeles.

Furthermore, implementation of the proposed project would replace existing residential units with new buildings that have improved HVAC filtration systems and no natural gas appliances and associated indoor air pollutants, as well as building designs that provide more energy efficiency and therefore provide more protection to residents than the existing buildings. The incorporation of MERV 13 filters as part of the new development would reduce the risk to residents currently living at the project site and will also reduce potential exposure for new residents added to the site.

Comment 5.5

EPA appreciates the commitments included in the Draft EIS to reduce environmental impacts associated with new construction, buildings, and housing, including the most current CALGreen Building Standards, which are comparable (and more stringent in certain categories) than LEED standards. We appreciate that the project will include measures such as high efficiency insulation, tankless water heaters, LED lighting fixtures, high-efficiency temperature control systems, and solar PV-ready roof system compliant with Title 24 requirements for photovoltaic solar incorporation into project design. Given that the project will result in large-scale demolition, as well as construction, within the same project footprint, we note that the opportunity exists to maximize the re-use of demolition by-products and maximize landfill diversion.

Recommendations:

- Clarify and commit to a minimum quantity of installed solar PV panels and compatible battery storage as well as a solar PV-ready roofing.
- In the Final EIS, include a strategy outlining commitments to incorporate green demolition practices. Refer to EPA's green infrastructure website: <https://www.epa.gov/green-infrastructure>.

Response 5.5

As specified in Project Design Feature (PDF) GHG-1 shown on page 4.5-39, the project is committed to including active PV solar that would offset a minimum of 15 percent of the total project's electrical demand. In addition, the proposed project would comply with the latest Title 24 requirements for solar PV-ready roofing. Given that the project would be constructed over the course of over a decade, committing to a minimum number of solar panels and PV-ready roofing would be speculative at this time, as solar PV technology and Title 24 requirements will continue to improve and change by the time solar installation occurs. For example, newer technology may exist in the future that would reduce the number of panels needed to result in the same net electrical

https://www.portoflosangeles.org/references/news_100120_air_emissions_report#:~:text=The%20Port%20also%20continues%20to,it%20has%20remained%20since%202016.

¹⁹ Port of Los Angeles, Port of Los Angeles Continues Clean Air Progress; 2019 Report: Aggressive Clean Air Measures, Innovation and Increased Efficiency Driven Gains. October 2020. Available:

https://www.portoflosangeles.org/references/news_100120_air_emissions_report#:~:text=The%20Port%20also%20continues%20to,it%20has%20remained%20since%202016.

offset. The project would comply, at a minimum, with PDF GHG-1 and the solar PV-ready requirements in the Title 24 standards at the time of construction, as is discussed in Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR/EIS.

As described in pages 4.15-40 and 4.15-41 of the Draft EIR/EIS, the Applicant and contractors would comply with the requirements of the CALGreen Code and LAMC Section 66.32. These regulations require the salvage, recycling, or reuse of a minimum of 75 percent of nonhazardous construction and demolition waste. Compliance with these requirements would ensure that construction contractors incorporate green demolition practices and that GHG emissions associated with construction waste would be reduced.

Comment 5.6

The Draft EIS indicates that elevated concentrations of several pollutants are present on both the OSP Specific Plan Site and the 327 Harbor Site due to past industrial activities. The Draft EIS discusses developing a Voluntary Oversight Agreement with the Los Angeles County Fire Department Site Mitigation Unit (LACFD SMU) as mitigation and documents an extensive process to address contamination at both project sites. Volatile organic compounds (VOCs) in soil vapor, which could pose a threat to human health of future project residents and workers through the migration of vapors through building floors and foundations, would be addressed through future coordination with the LACFD SMU and the City of Los Angeles Department of Building and Safety. The Draft EIS indicates that if vapor levels exceed certain screening criteria, a soil vapor Human Health Risk Assessment for both sites would be prepared and will evaluate the risk to future on-site residences from VOCs in on-site soil and would determine whether a vapor mitigation system is required. Protection of future residents and workers depends on the well-executed cleanup and development of protective barrier systems during construction and operation. It is not clear whether institutional controls would be part of the cleanup, such as the prohibition of subsurface planting or gardens, nor whether disclosures to residents would occur prior to occupation.

Recommendations:

- Include in the Final EIS a clear strategy for disclosing, to future residents, the status of soil contaminants and risks of exposure should a vapor barrier be compromised, such as from earthquakes.
- Identify the monitoring that would occur during the life of the project to ensure the vapor barriers' integrity.
- Document the intended involvement of the appropriate health and safety agencies during construction and once the residences are occupied (i.e., Los Angeles Department of Public Health, Department of Building and Safety) so the public health perspective can inform project actions.

Response 5.6

Project construction would include the excavation and removal of contaminated soils on the project site and replacement with clean, certified fill in accordance with Mitigation Measures HAZ-1 through HAZ-4 and the applicable regulatory measures as described in pages 4.6-34 through 4.6-42 of the Draft EIR/EIS. The removal and disposal of contaminated soils would occur under oversight by the appropriate health and safety agency, in this case, the Los Angeles Fire Department (LAFD) Site Mitigation Unit (SMU) with the potential for involvement of the Los Angeles Regional Water Quality Control Board and/or Department of Toxic Substances Control. The involvement of these agencies in

cleanup activities at the project site is included in the language of Mitigation Measures HAZ-1 through HAZ-5. As discussed on page 4.6-39 of the Draft EIR/EIS, with the removal of contaminated soils and replacement with clean, certified fill, “project residents, employees, and visitors would not be anticipated to encounter contaminated soils during project operation” and prohibition of subsurface planting or gardens would not be required.

If removal of contaminated soils on the site is not sufficient to reduce soil vapors to below the regulatory screening levels, Mitigation Measure HAZ-5 would be implemented, which requires the installation of vapor barriers and ongoing monitoring and maintenance of vapor barriers throughout the life of the project through implementation of a Soil Vapor Operations and Maintenance Plan. The Vapor Mitigation System and Soil Vapor Operations and Maintenance Plan would include monitoring requirements and would be reviewed and approved by the appropriate health and safety agency to ensure the integrity of the system over the lifetime of the project. In addition, if soil vapors exceed the regulatory screening levels, the project would be required to inform residents of the status of soil vapors in accordance with California Proposition 65 (Health and Safety Code Section 25249.5, et seq.).

Comment 5.7

We appreciate the description of the public outreach process in the Draft EIS, and the description of the phasing of the proposed project, which is intended to minimize disturbance to current residents on the OSP Specific Plan Site. The Draft EIS includes a description of adherence to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 for all displaced residents, and EPA recommends continued, meaningful coordination to mitigate impacts for any affected and displaced residents as this community-driven project proceeds.

Recommendations:

- For the remainder of the environmental review process and planning process, continue to engage the community through future phases and on an ongoing basis. Continue public outreach to ensure that potentially affected communities understand the project process and impacts and have the tools to provide feedback. The Environmental Justice Interagency Working Group’s Promising Practices for EJ Methodologies in NEPA Reviews provides ways to both consider environmental justice concerns during environmental analyses and encourage effective participation by communities with environmental justice concerns throughout project analysis and review.
- Consider communicating project impacts to the same individuals that participated during the previous public engagement sessions and work with the community to make recommendations regarding further minimization of impacts.
- As the project advances to final design, identify in the Final EIS community perspectives regarding impacts, and how City of Los Angeles and HUD have incorporated community perspectives into the project design, construction planning, operations considerations, and mitigation measures.

Response 5.7

As described on page 2-6 of the Draft EIR/EIS, the OSP Specific Plan and project design were informed by the OSP Transformation Plan, which was developed over the course of four-years of resident engagement, meetings and workshops, surveys, and small group discussions to establish a community vision for the future of Rancho San Pedro. The OSP Collaborative has developed a long-

term outreach plan to make ongoing strides towards the community's collective vision, as identified in the OSP Transformation Plan. To date the OSP Collaborative has reached critical milestones, advancing the work outlined in the OSP Transformational Plan, but importantly, the OSP Collaborative is committed to continuing this work throughout the implementation of the project. This will be achieved through a community outreach plan that is diverse, equitable, consistent and is centered around the lived experiences of current and future residents.

To ensure that residents of Rancho San Pedro remain engaged, the OSP Collaborative has established multiple platforms that will be available throughout the redevelopment timeline for residents to stay connected, informed, provide feedback, and ask questions. This includes the Rancho San Pedro Resident Newsletter, a communication will continue quarterly throughout the life of the project, and bi-monthly Community Awareness Committee (CAC) meetings with stakeholders. Additionally, the OSP Alliance, a network of local social service providers, and other community-based organizations will continue to meet monthly to discuss the project and community needs. The OSP Collaborative will also continue to participate in the First Thursday monthly San Pedro ArtWalks, where the OSP Collaborative's local office space is opened to the public to connect with the broader community regarding the project.

Starting in the fall of 2023, with grant funding from the California Accountable Communities for Health Initiative, the OSP Collaborative will work alongside Rancho San Pedro residents to establish and launch a community health fund. This fund will support activities that residents have identified as a priority for advancing their quality of life. Another planned initiative is the implementation of a One San Pedro Network (OSP Net). As part of OSP Net, members of the OSP Alliance will identify strategies to increase Rancho San Pedro residents' knowledge and utilization of local services, such as libraries, hospitals, schools, etc. The OSP Net will be designed with direct input from residents and will seek to increase connections between residents, stakeholders, and service providers. The community outreach plan and these planned initiatives will provide continued opportunities for meaningful community engagement and input on the project as it advances through the final design, construction, and operational phases.

In regard to the Final EIR/EIS, all residents will be notified of the availability of the document, as well as other stakeholders that participated in the Notice of Preparation/Notice of Intent and Draft EIR/EIS community meetings. The Final EIR/EIS will be published online on multiple platforms, and the community will be informed of how they can view the Final EIR/EIS and learn more about the environmental impacts, mitigation measures, and community input received to date.

Comment 5.8

The Draft EIS states that the Proposed Project Alternative would be designed with the potential impacts of climate change in mind, including building designs and materials that will be durable and resilient to 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. According to Federal Emergency Management Agency (FEMA) flood maps, the project site is located within Zone X, areas determined to be outside the 0.2 percent annual chance floodplain. Therefore, 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. 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.

Recommendations:

- In the Final EIS, discuss the potential impact of more extreme precipitation in the future and clarify if additional design measures are warranted given more extreme conditions anticipated.
- Clarify if stormwater management infrastructure was sized to accommodate the more intense precipitation patterns predicted and occurring under climate change and highlight additional design considerations added between Draft EIS and Final EIS to address anticipated future conditions.
- Include a commitment to low-impact development (LID)/green infrastructure techniques in designs to minimize stormwater pollution and revise landscaping and site plans to specifically identify these features (e.g., detention basins/rain gardens, grassy swales, etc.).

Response 5.8

Section 7.4.4, *Environmental Impact Statement: Global Climate Change, Greenhouse Gas Emissions, and Sea Level Rise*, of the Draft EIR/EIS discusses the most recently prepared scientific predictions of flooding and sea level rise in the San Pedro area. As stated on page 7-66 of the Draft EIR/EIS:

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).

Therefore, it is not anticipated that sea level rise and flooding would result in significant impacts to the project site.

While it is acknowledged in Section 7.4.4, *Environmental Impact Statement: Global Climate Change, Greenhouse Gas Emissions, and Sea Level Rise*, of the Draft EIR/EIS that global climate change may lead to extreme precipitation, the extent of future precipitation in San Pedro is not known at this time, and it would be speculative to attempt to design the project's stormwater management infrastructure based on future precipitation. However, as addressed in pages 4.7-23 through 4.7-31 of the Draft EIR/EIS, the proposed project would implement LID and green stormwater management design in accordance with the requirements of LAMC Chapter 64.70, LAMC Chapter 64.72, and the City's LID Handbook to minimize stormwater pollution and manage stormwater flows on the project site. At this time, the development plans, including landscaping and LID plans, are in the conceptual stage and the exact locations and design of stormwater management features are not available. However, the recommendation to consider future extreme precipitation in the design of stormwater management infrastructure will be shared with decision makers for their consideration as the design of the project progresses.

Comment 5.9

According to the Draft EIS, active photovoltaic (PV) solar will be installed on the project site to produce a minimum rate of 15 percent electricity demand. The proposed project would comply with Tier II voluntary Title 24 measures which require that a total of 40 percent of parking spaces are EV ready and a minimum of 15 percent of parking spaces equipped with EV chargers. Additional commitments include 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. The Proposed Project Alternative would be consistent with the 2022 Scoping Plan, Southern California Association of Governments/Regional Transportation Plan/Sustainable Community Strategy, and Green LA and Climate LA plans, which establish goals and strategies for reducing GHG emissions and the impacts of global climate change.

The Draft EIS states that the City of Los Angeles has adopted an All-Electric Ordinance, effective April 1, 2023, to reduce GHG emissions related to natural gas combustion. Under this ordinance, all building permit applications for newly constructed buildings will be required to be all-electric with some exceptions, such as cooking appliances within restaurants. Space heating, water heating and cooking appliances for non-restaurant uses would be required to be powered by electricity. The proposed project would prohibit natural gas uses in residential, retail, and office uses and would be consistent and not conflict with the City's All-Electric Ordinance.

Recommendations: Given the opportunity to build a new entire neighborhood and multiple use development from the ground up, the EPA recommends that the Final EIS commit to additional, specific measures to further reduce greenhouse gas emissions.

- Commit to a minimum level of PV solar panel installation (in addition to "PV-ready roofing") in the Final EIR/EIS.
- Confirm the project proponents are committed to installing a minimum of 321 parking spaces served by EV chargers (rather than 231, as stated in Table 4.2-5, Goal 5, Project Consistency, on page 223 of the Draft EIS) and commit to installing a larger number of EV charging spaces considering California's 2035 prohibition on the sale of internal combustion automobiles.
- Refer to U.S. EPA's Adaptation Resource Center for additional information on resiliency and adaptation measures as the project design is refined.
- Commit adequate resources to monitoring and compliance during the implementation of the proposed project, including compliance with federal, State, and local air quality and GHG emissions policies.

Response 5.9

As detailed in Response to Comment 5.5 above, committing to a minimum number of solar panels and solar PV-ready roofing would be speculative at this time as technology and the regulatory requirements are expected to change over the course of project construction. Nonetheless, the project has committed to offsetting a minimum of 15 percent of the total project's electrical demand with rooftop solar panels, as stated in PDF GHG-1 on page 4.5-39 of the Draft EIR/EIS.

The project has committed to a minimum of 321 parking spaces serviced by EV chargers as stated in PDF GHG-2 on page 4.5-39 of the Draft EIR/EIS. Any mention in the document of 231 spaces is a typographical error, including the project consistency discussion on page 7-223 of the Draft EIR/EIS. In addition to the 321 EV charging spaces that would be provided on the project site, 40 percent of parking spaces would be made EV ready as stated in PDF GHG-2. This would enable the addition of more EV chargers to the project site in the future as needed. These features would exceed the Title 24 requirements for EV chargers.

The U.S. EPA's Adaptation Resource Center's information will be provided to the design team as a resource to consider during the future refinement of the project design.

A MMRP has been prepared as part of the Final EIS/EIR (refer to Section 4, *Mitigation Monitoring and Reporting Program*) that outlines the monitoring and compliance responsibilities for all mitigation measures included in the Final EIR/EIS.

As discussed in the Responses to Comments 3.3, 3.4, 5.2, and 5.3 above, the inclusion of additional measures is not necessary, as the project design features and/or mitigation measures sufficiently reduce impacts to below significance levels.

Comment 5.10

The EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is released for public review, please provide an electronic copy to EPA Region 9 at the same time the document is formally filed online.

Response 5.10

A digital copy of the Final EIR/EIS will be provided to U.S. EPA Region 9 when it is formally filed online, as requested.

3 Errata to the Draft EIR/EIS

This chapter presents specific text changes made to the Draft EIR/EIS since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR/EIS and are identified by the Draft EIR/EIS page number. Text deletions are shown in ~~striketrough~~, and text additions are shown in underline. The information contained within this chapter clarifies and expands on information in the Draft EIR/EIS and does not constitute “significant new information” requiring recirculation (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5).

3.1 Revisions to the Draft EIR

Section 2, Project Description

Page 2-10:

The proposed project would generate an anticipated net increase of approximately ~~114141~~ residents on the 327 Harbor Site.

Page 2-18:

The proposed project would generate an anticipated net increase of approximately ~~2,6022,900~~ residents and 314 employees on the OSP Specific Plan Site.

Section 4.2, Air Quality

Page 4.2-19:

Construction on the 327 Harbor Site would include site preparation, grading, building construction, paving, and architectural coating. Excavation on the 327 Harbor Site would be a maximum of 5 feet bgs for removal of approximately 4,300 cy of uncertified artificial fill material, except for the placement of 24-inch piles, which would include ground disturbance to a maximum depth of 45 feet bgs. With a capacity of 16 cy per truck, soil hauling from the 327 Harbor Site would result in approximately 280 one-way truck trips. Grading and excavation activities on the project site would include the potential for the excavation and removal of contaminated soil.

Table 4.2-6 Construction Emissions – Regional Threshold Comparison (lbs/day)

Phase/Overlap ¹	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Scenario A (lbs/day)						
327 Harbor Site	4	3439	4041	<1	34	2
OSP Specific Plan Site Phase 1	13	114121	150151	<1	1011	56
OSP Specific Plan Site Phase 2	17	7797	151156	<1	810	34
OSP Specific Plan Site Phase 3	1917	8250	14927	<1	9	3
Overlap by Year²						
2024	15	121128	159	<1	1112	6
2025	13	108114	151152	<1	1011	5
2034	2820	11179	20785	<1	17	65
2035	2118	5033	13376	<1	1516	5
Scenario B (lbs/day)						
327 Harbor Site	4	3439	4041	<1	34	2
OSP Specific Plan Site Phase 1	13	114121	150151	<1	1011	56
OSP Specific Plan Site Phase 2	18	7797	151156	<1	810	34
OSP Specific Plan Site Phase 3	1512	8250	14927	<1	9	3
Overlap by Year²						
2024	15	121128	159	<1	1112	6
2025	13	108114	151152	<1	1011	5
2034	3021	11179	20785	<1	1717	65
2035	2118	5033	13376	<1	1516	5
Maximum (lbs/day)						
Scenario A	28	121128	207159	<1	17	6
Scenario B	30	121128	207159	<1	17	6
<i>Regional Construction Thresholds</i>	75	100	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No

lbs/day = pounds per day; 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; SO₂ = sulfur dioxide; CO = carbon monoxide

¹ The 327 Harbor Site is referred to as “327 Harbor” in the CalEEMod outputs.

² “Overlap by year” rows show the maximum daily emissions where development of Phases overlap. Specifically, during years 2024 and 2025 it is anticipated that construction activities will occur on both the 327 Harbor Site as well as within Phase 1 and in years 2034 and 2035 construction activities will occur in both Phases 2 and 3.

Source: See Appendix B

Page 4.2-33:

Table 4.2-8 Construction and Operational Overlap Emissions – Regional Threshold Comparison

Plan Area ¹	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Scenario A (lbs/day)						
Construction of OSP Specific Plan Site Phases 2 and 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1						
Construction of OSP Specific Plan Site Phases 2 and 3	<u>2820</u>	<u>41479</u>	<u>20785</u>	<1	17	<u>65</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	20	8	104	<1	19	5
Total	<u>4840</u>	<u>41886</u>	<u>311189</u>	<1	<u>3536</u>	<u>4110</u>
Construction of OSP Specific Plan Site Phase 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2						
Construction of OSP Specific Plan Site Phase 3	<u>1917</u>	<u>8250</u>	<u>44927</u>	<1	9	3
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	48	18	251	<1	47	13
Total	<u>6764</u>	<u>9968</u>	<u>400278</u>	<1	56	16
Scenario B (lbs/day)						
Construction of OSP Specific Plan Site Phases 2 and 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1						
Construction of OSP Specific Plan Site Phases 2 and 3	<u>3021</u>	<u>41479</u>	<u>20785</u>	<1	17	<u>65</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	24	9	123	0	22	6
Total	<u>5445</u>	<u>41988</u>	<u>330208</u>	0<1	39	<u>4211</u>
Construction of OSP Specific Plan Site Phase 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2						
Construction of OSP Specific Plan Site Phase 3	<u>1512</u>	<u>7797</u>	<u>454156</u>	<1	<u>810</u>	<u>34</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	55	21	292	<1	55	15
Total	<u>7167</u>	<u>98118</u>	<u>443447</u>	<1	<u>6465</u>	19
Maximum (lbs/day)						
Max Scenario A	<u>6764</u>	<u>41886</u>	<u>400278</u>	<1	56	16
Max Scenario B	<u>6771</u>	<u>419118</u>	<u>443447</u>	<1	<u>6465</u>	19
<i>Existing</i>	(18)	(9)	(109)	(<1)	(15)	(4)
Net Scenario A	<u>4946</u>	<u>40977</u>	<u>292170</u>	<1	<u>4142</u>	<u>4211</u>
Net Scenario B	<u>5249</u>	<u>410109</u>	<u>334339</u>	<1	<u>4951</u>	<u>4415</u>
Regional Operational Thresholds	55	55	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No

lbs/day = pounds per day; 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; SO₂ = sulfur dioxide; CO = carbon monoxide

Note: Totals may be rounded based on the totals presented in the CalEEMod outputs.

¹ Note that the 327 Harbor Site is referred to as “327 Harbor” in the CalEEMod outputs.

Source: See Appendix B

Page 4.2-34:

Table 4.2-9 Mitigated Construction Emissions – Regional Threshold Comparison (lbs/day)

Phase/Overlap ¹	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Scenario A (lbs/day)						
327 Harbor Site	2	813	3637	<1	2	<1
OSP Specific Plan Site Phase 1	7	2734	132133	<1	8	2
OSP Specific Plan Site Phase 2	13	2647	134138	<1	78	2
OSP Specific Plan Site Phase 3	16	3041	13232	<1	89	23
Overlap by Year²						
2024	5	2936	140141	<1	57	22
2025	4	2834	134135	<1	56	12
2034	1615	4052	19091	<1	1516	4
2035	1615	2717	13777	<1	1415	4
Scenario B (lbs/day)						
327 Harbor Site	2	813	3637	<1	2	11
OSP Specific Plan Site Phase 1	8	2734	132133	<1	8	22
OSP Specific Plan Site Phase 2	15	2647	134138	<1	78	2
OSP Specific Plan Site Phase 3	12	3041	13232	<1	89	23
Overlap by Year²						
2024	5	2936	140141	<1	57	2
2025	4	2834	134135	<1	56	12
2034	1816	4052	19091	<1	1516	4
2035	1615	2717	13777	<1	1415	4
Maximum (lbs/day)						
Scenario A	16	4052	190141	<1	1516	4
Scenario B	1816	4052	190141	<1	1516	4
<i>Regional Construction Thresholds</i>	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

lbs/day = pounds per day; 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; SO₂ = sulfur dioxide; CO = carbon monoxide

¹ The 327 Harbor Site is referred to as “327 Harbor” in the CalEEMod outputs.

² “Overlap by year” rows show the maximum daily emissions where development of Phases overlap. Specifically, during years 2024 and 2025 it is anticipated that construction activities will occur on both the 327 Harbor Site as well as within Phase 1 and in years 2034 and 2035 construction activities will occur in both Phases 2 and 3.

Source: See Appendix B

Page 4.2-36:

Table 4.2-11 Mitigated Construction and Operational Overlap Emissions – Regional Threshold Comparison

Plan Area ¹	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Scenario A (lbs/day)						
Construction of OSP Specific Plan Site Phases 2 and 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1						
Construction of OSP Specific Plan Site Phases 2 and 3	<u>4615</u>	<u>4052</u>	<u>19091</u>	<1	<u>4516</u>	4
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	20	<u>78</u>	<u>94104</u>	<1	<u>4819</u>	5
Total	<u>4635</u>	<u>4859</u>	<u>284195</u>	<1	<u>4334</u>	9
Construction of OSP Specific Plan Site Phase 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2						
Construction of OSP Specific Plan Site Phase 3	16	<u>3041</u>	<u>13232</u>	<1	<u>89</u>	<u>23</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	<u>4748</u>	<u>1718</u>	<u>226251</u>	<1	47	13
Total	<u>6364</u>	<u>4759</u>	<u>358284</u>	<1	<u>5556</u>	<u>4516</u>
Scenario B (lbs/day)						
Construction of OSP Specific Plan Site Phases 2 and 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1						
Construction of OSP Specific Plan Site Phases 2 and 3	<u>4816</u>	<u>4052</u>	<u>19091</u>	<1	<u>4516</u>	4
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	<u>2324</u>	9	<u>111123</u>	<1	22	6
Total	<u>4140</u>	<u>4961</u>	<u>301214</u>	<1	<u>3738</u>	10
Construction of OSP Specific Plan Site Phase 3 Plus Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2						
Construction of OSP Specific Plan Site Phase 3	12	<u>2641</u>	<u>134138</u>	<1	<u>78</u>	2
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	55	<u>2021</u>	<u>263292</u>	<1	55	15
Total	67	<u>4762</u>	<u>397430</u>	<1	63	<u>1718</u>
Maximum (lbs/day)						
Max Scenario A	<u>6364</u>	<u>4859</u>	<u>358284</u>	<1	<u>5556</u>	<u>4516</u>
Max Scenario B	67	<u>4962</u>	<u>397430</u>	<1	<u>6363</u>	<u>1718</u>
<i>Existing</i>	(18)	(9)	(109)	(<1)	(15)	(4)
Net Scenario A	<u>4546</u>	<u>3850</u>	<u>249175</u>	<1	<u>4041</u>	11
Net Scenario B	<u>4849</u>	<u>3953</u>	<u>288322</u>	<1	48	13
<i>Regional Operational Thresholds</i>	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

lbs/day = pounds per day; 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; SO₂ = sulfur dioxide; CO = carbon monoxide

Note: Totals may be rounded based on the values presented in the CalEEMod outputs.

¹ Note that the 327 Harbor Site is referred to as "327 Harbor" in the CalEEMod outputs.

Source: See Appendix B

Section 4.5, Greenhouse Gas Emissions

Page 4.5-41:

Table 4.5-8 Estimated GHG Emissions during Construction

Construction GHG Emissions (MT of CO ₂ e)					
	327 Harbor Site	OSP Phase 1	OSP Phase 2	OSP Phase 3	Total
2023	<u>178,174</u>				<u>178,174</u>
2024	171	<u>2,016,896</u>			<u>2,207,067</u>
2025	7	<u>2,420,219</u>			<u>2,429,226</u>
2026		<u>1,403,379</u>			<u>1,403,379</u>
2027		<u>1,384,360</u>			<u>1,384,360</u>
2028		<u>1,572,514</u>			<u>1,572,514</u>
2029		<u>1,649,577</u>			<u>1,649,577</u>
2030		<u>1,668,598</u>			<u>1,668,598</u>
2031			<u>2,454,507</u>		<u>2,454,507</u>
2032			<u>1,580,524</u>		<u>1,580,524</u>
2033			<u>1,454,430</u>		<u>1,454,430</u>
2034			<u>1,688,630</u>	<u>2,122,794</u>	<u>3,810,424</u>
2035			<u>893,837</u>	<u>1,477,906</u>	<u>2,370,743</u>
2036				<u>1,573,970</u>	<u>1,573,970</u>
2037				<u>1,065,645</u>	<u>1,065,645</u>
Total					<u>26,794,20,912</u>
Amortized over 30 years					<u>893,697</u>

OSP = One San Pedro Specific Plan Site; MT of CO₂e = metric tons of carbon dioxide equivalent

Source: See Appendix B

Page 4.5-42:

Table 4.5-9 Combined Annual GHG Emissions

Emission Source	Project Emissions (MT of CO ₂ e per year)	
	Scenario A	Scenario B
Area	28	28
Electric ¹	1088	1,148
Mobile	9,670	9,533
Solid Waste	325	326
Water	78	78
Amortized Construction	893,697	893,697
PDF GHG-1: PV Solar	(156)	(165)
PDF GHG-2: EV Charging Stations	(6,013)	(6,035)
PDF GHG-3: TDM Measures	(206)	(206)
Operational Emissions	<u>5,624,684</u>	<u>5,524,574</u>
Existing Emissions	3,108	3,108
Net Emissions	<u>2,526,240</u>	<u>2,415,232</u>

MT of CO₂e = metric tons of carbon dioxide equivalent; () = negative values

¹ Additional regulatory reductions account for the increased RPS requirements which reduces carbon intensity of electricity usage.

Source: Appendix B

Section 4.6, Hazards and Hazardous Materials

Page 4.6-37:

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

Section 4.10, Population and Housing

Page 4.10-2:

The OSP Specific Plan Site is developed with 478 residential units, while the 327 Harbor Site is vacant and undeveloped. Based on the ~~San Pedro Community Plan Area (CPA)~~ current Rancho San Pedro household demographics of approximately ~~2.42~~ 3.0 persons per residential unit, the OSP Specific Plan Site has approximately ~~1,157~~ 1,434 residents (HACLA 2020). It is noted that the San Pedro Community Plan Area (CPA) has a persons per residential unit ratio of 2.42 (City of Los Angeles 2021a).

Page 4.10-16:

The proposed project’s residential population was calculated based on the San Pedro CPA household demographics of approximately 2.42 persons per residential unit for market rate rental and the homeownership units (City of Los Angeles 2021a). The residential population for replacement units and affordable rental units was calculated based on the Rancho San Pedro household demographics of 3.0 persons per household (HACLA 2020).

Page 4.10-18:

Based on the estimate of 3.0 persons per household at Rancho San Pedro and the 2020 estimate of 2.42 persons per household in the San Pedro CPA, the proposed project would provide housing for an estimated ~~3,872,475~~ residents (HACLA 2020; City of Los Angeles 2021a)¹. The project would include replacement housing for the existing 478 housing units on the OSP Specific Plan Site; therefore, the proposed project would result in an estimated net increase of 2,7153,041 residents on the project site².

¹ 1,600 households x 2.42 persons per household = 3,872 persons
1,042 affordable rental households (3.0 persons per household) = 3,126 persons

480 market rate rental households (2.42 persons per household) = 1,162 persons

77 ownership households (2.42 persons per household) = 187 persons

Total population = 4,475

² 3,872,475 persons – 478 households (2,423.0 persons per household) = 2,7153,041 persons

Page 4.10-23 (showing revised rows only):

Table 4.10-4 Cumulative Population, Housing, and Employment

Project No.	Project Location ¹	Land Use ¹	Size ¹	Housing (du) ¹	Population ²	Employment ³
1	921 South Beacon Street	Apartments	100 du	100	242	--
		Commercial	14,717 sf	--	--	594
2	544 South Pacific Avenue	Hotel	80 rooms	--	--	40
3	444 West 5th Street	Apartments	106 du	106	257	--
		Retail	2,000 sf	--	--	4
4	511 South Harbor Boulevard	Apartments	137 du	137	332	--
		Retail	394 sf	--	--	1
		Restaurant	2,129 sf	--	--	9
5	111 North Harbor Boulevard	Apartments	120 du	120	290	--
		Retail	4,166 sf	--	--	8
6	505 South Centre Street	Apartments	300 du	300	726	--
		Retail	13,038 sf	--	--	26
		Restaurant	12,441 sf	--	--	50
7	222 West 6th Street	Office space (removed)	262,679 sf	--	--	(1,051)
		Apartments	228 du	228	552	--
		Retail	15,000 sf	--	--	30
8	420 West 9th Street	Apartments	56 du	56	136	--
9	457 West 7th Street	Restaurant	3,812 sf	--	--	15
10	625 South Beacon Street	Mixed Use	281 du	281	680	--
		Restaurant	2,316 sf	--	--	9
11	319-345 Beacon Street and 117 O'Farrell Street	Apartments	89 du	89	215	--
12	456-462 West 9th Street and 457-473 West 8th Street	Apartments	91 du	91	220	--
Cumulative Projects Total				1,508	3,649	(800)
Net proposed project				1,122	<u>7153,041</u>	314
Cumulative Project Plus proposed project Total				2,630	3646,690	(486)

sf = square feet; du = dwelling units; () = negative value

¹ Cumulative project details were sourced from the Memorandum of Understanding (MOU) prepared for the project by Fehr & Peers in June 2022 (see Appendix I of this EIR/EIS), as described in Section 3.4, *Cumulative Development*.² Based on a household rate of 2.42 persons per household in the San Pedro CPA (City of Los Angeles 2021a).³ Based on employee generation rates from the LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Table 1, including: General Retail = 2/1,000 sf; Restaurant (high-turnover sit-down and quality restaurants) = 4/1,000 sf; Hotel = 0.5/room; General Office = 4/1,000 sf (LADOT 2020).⁴ Details regarding the type of commercial use for this cumulative project are not available. Therefore, commercial uses were conservatively modeled using the restaurant employee generation rate, which is higher than general retail.

Page 4.10-24:

The proposed project, along with the cumulative projects, would result in 2,630 new housing units, ~~6,364~~6,690 new residents, and 486 fewer employees than under current conditions.

Section 4.11, Public Services

Page 4.11-16:

The proposed project would result in an estimated total residential population of approximately ~~3,872~~4,475 people, which represents a net increase of ~~2,715~~3,041 residents compared to existing uses.

Page 4.11-19:

The proposed project combined with cumulative development would result in a net increase of ~~6,364~~6,690 residents in the project area, as well as a reduction of 486 employees.

Page 4.11-30:

The proposed project would result in an estimated total residential population of approximately ~~3,872~~4,475 people, which represents a net increase of ~~2,715~~3,041 residents compared to existing uses.

Page 4.11-32:

The proposed project combined with cumulative development would result in a net increase of ~~6,364~~6,690 residents in the LAPD Harbor Community Division, as well as a reduction of 486 employees.

Page 4.11-52:

Therefore, the proposed project would result in a net increase of ~~2,715~~3,041 residents compared to existing uses.

According to LAPL, the San Pedro Regional Branch Library service population is approximately 82,604 persons. With the addition of the project's ~~2,715~~3,041 estimated new residents, the service population of the San Pedro Regional Branch Library would increase to ~~85,319~~85,645 persons, or an increase of approximately ~~3.33~~3.7 percent.

Page 4.11-52:

The proposed project combined with cumulative development would result in a net increase of ~~6,364~~6,690 residents in San Pedro, as well as a reduction of 486 employees. The proposed project along with cumulative projects would increase the service population of the San Pedro Regional Branch Library to ~~88,968~~89,294, or by approximately ~~8.48~~8.1 percent.

Section 4.12, Recreation

Page 4.12-14:

Therefore, the proposed project would result in an estimated total residential population of approximately ~~3,8724,475~~ people, which represents a net increase of ~~2,7153,041~~ residents compared to existing uses.

Page 4.12-21:

Based on the net increase of ~~2,7153,041~~ residents associated with the proposed project and the Public Recreation Plan standards, the project would generate demand for an additional ~~5.436.1~~ acres each of neighborhood and community parkland and ~~16.29~~18.2 acres of regional parkland, for a total of ~~27.15~~30.4 acres of parkland within San Pedro.

Section 5, Other CEQA

Page 5-7:

Based on the estimate of 3.0 persons per household at Rancho San Pedro and the 2020 estimate of 2.42 persons per household in the San Pedro Community Plan Area, the proposed project would result in an estimated net increase of ~~2,7153,041~~ residents on the project site (City of Los Angeles 2021)³.

Section 7, Environmental Impact Statement

Page 7-50:

³ ~~1,122 households x 2.42 persons per household = 2,715 persons~~ 564 affordable rental households (3.0 persons per household) = 1,692 persons
480 market rate rental households (2.42 persons per household) = 1,162 persons
77 ownership households (2.42 persons per household) = 187 persons
Total population = 3,041

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

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Scenario A					
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	67	13	1	<1
OSP Specific Plan Site Phase 3	2	53	116	1	<1
327 Harbor Site + OSP Specific Plan Site Phase 1	<u>1</u>	<u>910</u>	13	1	<u><11</u>
OSP Specific Plan Site Phase 2 + OSP Specific Plan Site Phase 3	<u>32</u>	<u>95</u>	<u>810</u>	<u>1</u>	<u><1</u>
Scenario B					
<u>327 Harbor Site</u>	<u><1</u>	<u>1</u>	<u>1</u>	<u><1</u>	<u><1</u>
<u>OSP Specific Plan Site Phase 1</u>	<u>1</u>	<u>9</u>	<u>13</u>	1	<u><1</u>
<u>OSP Specific Plan Site Phase 2</u>	<u>2</u>	<u>7</u>	<u>13</u>	1	<u><1</u>
<u>OSP Specific Plan Site Phase 3</u>	<u>2</u>	<u>3</u>	<u>6</u>	1	<u><1</u>
<u>327 Harbor Site + OSP Specific Plan Site Phase 1</u>	<u><1</u>	<u>10</u>	<u>13</u>	1	<u><1</u>
<u>OSP Specific Plan Site Phase 2 + OSP Specific Plan Site Phase 3</u>	<u>2</u>	<u>5</u>	<u>10</u>	<u>1</u>	<u><1</u>
Overall Project					
Maximum Annual Emissions	<u>32</u>	<u>99.5</u>	<u>813</u>	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; 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					

Page 7-52:

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	32	<u>95</u>	1810	1	4 <u><1</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	4	1	17	3	1
Total	6	<u>107</u>	<u>3527</u>	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	53	146	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	8	3	41	8	2
Total	11	<u>86</u>	<u>5247</u>	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	32	<u>95</u>	1810	1	4 <u><1</u>
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	4	2	20	4	1
Total	7	<u>107</u>	<u>3830</u>	5	<u>2</u>
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	53	146	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	10	4	48	10	3
Total	11	<u>97</u>	<u>5954</u>	11	3
Overall Project (tons/year)					
Max Scenario A	11	<u>107</u>	<u>5247</u>	9	2
Max Scenario B	11	<u>107</u>	<u>5954</u>	11	3
<i>Existing</i>	3	2	17	3	1
Net Scenario A	7	<u>85</u>	<u>3530</u>	<u>67</u>	<u>12</u>
Net Scenario B	8	<u>95</u>	<u>4237</u>	8	2
<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; 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					
Note: Totals may not add up correctly due to rounding.					
Source: See Appendix B					

Page 7-55:

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

Phase	VOC	NO _x	CO	PM ₁₀	PM _{2.5}
Scenario A					
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	23	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	34	17	1	<1
Scenario B					
<u>327 Harbor Site</u>	<u><1</u>	<u><1</u>	<u>1</u>	<u><1</u>	<u><1</u>
<u>OSP Specific Plan Site Phase 1</u>	<u>1</u>	<u>2</u>	<u>13</u>	<u>1</u>	<u><1</u>
<u>OSP Specific Plan Site Phase 2</u>	<u>2</u>	<u>3</u>	<u>12</u>	<u>1</u>	<u><1</u>
<u>OSP Specific Plan Site Phase 3</u>	<u>1</u>	<u>2</u>	<u>10</u>	<u>1</u>	<u><1</u>
<u>327 Harbor Site and OSP Specific Plan Site Phase 1</u>	<u><1</u>	<u>2</u>	<u>13</u>	<u>1</u>	<u><1</u>
<u>OSP Specific Plan Site Phases 2 and 3</u>	<u>2</u>	<u>4</u>	<u>17</u>	<u>1</u>	<u><1</u>
Overall Project					
Maximum Annual Emissions	2	34	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

Page 7-56:

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	34	17	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phase 1	3	1	16	3	1
Total	5	45	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	56	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	34	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	56	54	11	3
Overall Project (tons/year)					
Max Scenario A	10	56	48	9	2
Max Scenario B	11	56	54	11	3
<i>Existing</i>	3	2	17	3	1
Net Scenario A	7	34	31	67	12
Net Scenario B	8	4	37	8	2
<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

Page 7-60:

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

Phase	VOC	NO_x	CO	PM₁₀	PM_{2.5}
327 Harbor Site	<1	1	1	<1	<1
OSP Specific Plan Site Phase 1	2	7 8	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

Page 7-61:

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	43	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	54	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

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

Source: See Appendix B

Table 7-63:

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 11	1	<1
OSP Specific Plan Site Phase 2	1	2	8	1	<1
OSP Specific Plan Site Phase 3	1	2 3	8 9	1	<1
327 Harbor Site + OSP Specific Plan Site Phase 1	<1	2	11 12	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	23	1112	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

Page 7-64; Table 7-19 (shows revised rows only)

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	23	89	1	<1
Operation of 327 Harbor Site and OSP Specific Plan Site Phases 1 and 2	6	3	35	7	2
Total	7	56	43	8	2
Max Emissions	7	56	43	8	2
<i>Existing</i>	3	2	17	3	1
Net Emissions	4	4	26	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

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

Source: See Appendix B

Page 7-133:

As described in Section 4.11, *Public Services*, the Proposed Project Alternative would result in a net increase of approximately 2,7153,041 residents, 314 employees, and 453 students compared to existing uses, which would incrementally increase the demand for public services in the project vicinity.

Page 7-141:

The Proposed Project Alternative would increase the number of people on the project site by 2,7153,041 residents and 314 employees compared to existing uses, which could increase demand for existing recreational resources in the project area.

Page 7-190:

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 2,7153,041 new residents.

Page 7-198:

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 2,7153,041 new residents.

Section 8, References

Page 8-20:

HACLA. 2020. One San Pedro Transformation Plan. February 28, 2020.

4 Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code Section 21081.6). The U.S. Department of Housing and Urban Development (HUD) environmental regulation that implements NEPA similarly requires the adoption of a monitoring and enforcement program for any enforceable mitigation requirements or commitments. (24 Code of Federal Regulations (CFR) Section 58.60(e), citing 40 CFR 1505.2). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS), specifications are made herein that identify the action required, whether the action is required for CEQA and/or NEPA purposes, the monitoring that must occur, and the agency or department responsible for oversight.

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Mitigation Measure/ Condition of Approval (source)	Verification/Monitoring Requirements	Timing of Implementation	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Compliance Verification Comments
Aesthetics						
AES-1. Construction Screening (EIR)						
Temporary construction fencing shall be placed along the periphery of active construction staging and work areas to shield construction activity from view at the street level.	The Applicant shall ensure that this measure is reflected on construction plans and that construction fencing is in place prior to the start of construction. The Applicant shall ensure that fencing is maintained in good condition (e.g., graffiti and damage-free) throughout the construction period. HACLA shall verify through periodic field inspections that this measure is being implemented.	Prior to the start of construction and throughout the entire construction period.	HACLA			
AES-2. Construction Lighting (EIR)						
Outdoor lighting used during construction shall be shielded and/or aimed such that the light source cannot be seen from adjacent residential properties and the public right-of-way. However, construction lighting shall be sufficient to protect the safety of construction workers.	The Applicant shall ensure that this requirement is reflected on construction plans. HACLA shall verify through periodic field inspections that this measure is being implemented.	Prior to the start of construction and throughout the entire construction period.	HACLA			
Air Quality						
AQ-1. Construction Equipment (EIR/EIS)						
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: <ul style="list-style-type: none"> Mobile off-road construction equipment (wheeled or tracked) greater than 50 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 	The Applicant shall ensure that construction contractors have access to and shall utilize the equipment types specified through contractual language and documents. The Applicant shall also ensure this measure is identified on project plans. Construction bid documents, purchase orders, and contracts, and project plans identifying these requirements shall be provided to HACLA for verification.	Prior to mobilization of construction equipment for each stage of construction.	HACLA			

Mitigation Measure/ Condition of Approval (source)	Verification/Monitoring Requirements	Timing of Implementation	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Compliance Verification Comments
<p>specification or model year specification shall be available upon request at the time of mobilization of each piece of equipment.</p> <ul style="list-style-type: none"> ▪ 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 (EIR/EIS)						
<p>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 HACL A and the project Applicant.</p>	<p>HACL A shall ensure that this requirement is reflected in the Master Development Agreement and that landscaping maintenance bid documents and purchase orders include this requirement.</p>	<p>Prior to the issuance of occupancy permits for each stage of the development.</p>	<p>HACL A</p>			
Cultural Resources						
CUL-1. Interpretive Display (EIR/EIS)						
<p>HACL A shall ensure that the project Applicant prepares and installs an interpretive display in the Phase 1 Community Room, which will be open to the public. 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</p>	<p>HACL A shall verify that the Applicant has retained a person(s) meeting the Secretary of the Interior's Professional Qualifications Standards for history or architectural history to prepare the interpretive display. HACL A and the City of Los Angeles Office of Historic Resources shall review and approve the interpretive display materials. HACL A shall visit the Phase 1 Community Room to verify that the display has been placed onsite.</p>	<p>Prior to the issuance of occupancy permits for the Phase 1 Community Room.</p>	<p>HACL A</p>			

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<p>content shall be prepared by persons meeting the Secretary of the Interior’s Professional Qualifications Standards for history or architectural history in coordination with the City of Los Angeles Office of Historic Resources. The Interpretive Display may be rotated amongst Community Rooms and/or public outdoor spaces throughout the OSP Specific Plan Site with approval by HACLA.</p>						
CUL-2. Informational Website (EIR/EIS)						
<p>HACLA and/or the project Applicant shall add to their 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.</p>	<p>HACLA shall verify that the Applicant has retained a person(s) meeting the Secretary of the Interior’s Professional Qualifications Standards for history or architectural history to prepare the informational website. HACLA shall review and approve the website materials and ensure the website is posted online. HACLA shall ensure that the website remains available online and is updated periodically, as needed, if new relevant information becomes available, such as new historical materials regarding Rancho San Pedro or the initiation of new HACLA projects affecting historic-aged public housing in Los Angeles.</p>	<p>Within six months of the issuance of occupancy permits for the Phase 1 Community Room. The website shall be maintained in perpetuity and updated periodically.</p>	<p>HACLA</p>			
CUL-3. Project Archaeologist (EIR/EIS)						
<p>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 (CUL-4 and CUL-5). The Project</p>	<p>HACLA shall ensure, through contractual agreements, that the Project Archaeologist has been retained to ensure mitigation and/or conditions of approval for the project during ground disturbing activities are implemented. Upon completion of construction, the Project Archaeologist shall prepare and</p>	<p>Prior to the issuance of a permit for any ground-disturbing activities.</p>	<p>HACLA</p>			

Mitigation Measure/ Condition of Approval (source)	Verification/Monitoring Requirements	Timing of Implementation	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Compliance Verification Comments
Archaeologist shall be responsible for preparing and executing any testing and/or reporting programs necessary in the event of a find during project execution.	submit a Cultural Resources Monitoring Report that documents the results of the monitoring.					
CUL-4. Worker’s Environmental Awareness Training (EIR/EIS)						
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 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.	HACLA shall ensure, through contractual agreements, that qualified archaeologist and Native American representative have been retained to conduct a WEAP training on archaeological sensitivity for all construction personnel during ground disturbing activities. Signed training logs from each WEAP shall be provided to HACLA. If new construction personnel that carry out ground disturbing activities are added throughout construction, an additional WEAP(s) will be held to train those personnel. Upon completion of construction, the Project Archaeologist shall prepare and submit a Cultural Resources Monitoring Report that documents the results of the monitoring.	Prior to the issuance of any permit for ground-disturbing activities the qualified archaeologist and Native American representative shall be retained. The WEAP training shall occur prior to the commencement of any ground-disturbing activities and when new construction personnel, as applicable, are added to the project.	HACLA			
CUL-5. Archaeological Monitoring (EIR/EIS)						
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	HACLA shall ensure, through contractual agreements, that the Project Archaeologist and archaeological and Native American monitors have been retained to provide archaeological resources monitoring during ground disturbing activities. Upon completion of construction, the Project Archaeologist shall prepare and submit a Cultural Resources Monitoring Report that	During ground-disturbing construction activities	HACLA			

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<p>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.</p> <p>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.</p> <p>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).</p>	<p>documents the results of the monitoring.</p>					
CUL-6. Inadvertent Discovery of Archaeological Resources (EIR/EIS)						
<p>If cultural resources are encountered during ground-disturbing activities that have not been previously identified,</p>	<p>If cultural resources are encountered, work shall be halted within a 100-foot</p>	<p>During ground-disturbing activities,</p>	<p>HACLA</p>			

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<p>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 of Historical Resources (CRHR) and/or National Register of Historic Places (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.</p> <p>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.</p> <ul style="list-style-type: none"> ▪ 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 	<p>radius, and the Project Archaeologist shall notify HACLA of the find. The Project Archaeologist shall investigate and make appropriate recommendations. If additional measures are recommended by the Project Archaeologist, HACLA shall review and approve additional work for evaluation and treatment efforts and to mitigate any impacts to eligible resources.</p>	<p>as needed and if archaeological resources are identified.</p>				

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<p>property or historical resource using the criteria of the NRHP/CRHR.</p> <ul style="list-style-type: none"> ▫ 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: <ul style="list-style-type: none"> - The project shall be re-designed as to avoid any adverse effects; or - A data recovery program shall be implemented. ▪ Archaeological Data Recovery Program: ▪ 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 Office of Historic Preservation's (OHP) 1990 <i>Archaeological Resource Management Reports: Recommended Contents and Format</i>. ▪ 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: <ul style="list-style-type: none"> ▫ Field Methods and Procedures 						

Mitigation Measure/ Condition of Approval (source)	Verification/Monitoring Requirements	Timing of Implementation	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Compliance Verification Comments
<ul style="list-style-type: none"> ▫ Thresholds for Achieving Data Redundancy ▫ Cataloguing and Laboratory Analysis ▫ Discard and Deaccession Policy ▫ Interpretive Program ▫ Security Measures ▫ Final Report ▫ Curation 						
CUL-7. Unanticipated Discovery of Human Remains and Associated Grave Goods (EIR/EIS)						
<p>In the event human remains are unexpectedly discovered at any time during the implementation of the project, HACLA, the Project Archaeologist and the project Applicant 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 Native American Heritage Commission (NAHC). Native American human remains are defined in PRC 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Any items associated with human remains that are placed or buried with Native American human remains are to be treated in the same manner as the remains in accordance with PRC 5097.98(d)(2). The NAHC shall notify a Most Likely Descendant (MLD), and 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. Any discovery of human remains or grave goods shall be kept confidential to prevent further disturbance.</p>	<p>If human remains are found and/or exposed, the Project Applicant shall document and submit written proof to HACLA that the procedures listed in this mitigation measure have been implemented and complied with.</p>	<p>During ground-disturbing activities, as needed and if archaeological resources are identified.</p>	<p>HACLA</p>			

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Geology and Soils						
GEO-1. Final Geotechnical Report (EIR/EIS)						
<p>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 Consultants, Inc. (Group Delta), including the following:</p> <ul style="list-style-type: none"> ▪ 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 	<p>The project Applicant shall retain a registered civil engineer or engineering geologist to prepare final design-level geotechnical reports for the proposed structures. The grading and structural design plans shall comply with the recommendations contained in the final geotechnical reports and all applicable local, State, and federal regulations. LADBS shall ensure that the final building and founding designs shall incorporate the design recommendations of the final geotechnical reports.</p>	<p>Prior to the issuance of grading permits</p>	<p>LADBS</p>			

Mitigation Measure/ Condition of Approval (source)	Verification/Monitoring Requirements	Timing of Implementation	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Compliance Verification Comments
<p>proposed structure. All recommendations regarding the foundation options for Zones A, B, and C and Transition Zones shall be considered and implemented.</p> <ul style="list-style-type: none"> ▪ 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. 						

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<ul style="list-style-type: none"> 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 (EIR/EIS)						
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.	The project Applicant shall retain a certified geotechnical professional. The geotechnical professional shall provide weekly logs to the LADBS City Engineer. The City Engineer shall review the weekly logs to verify ongoing compliance.	During grading operations for foundations and pile installation activities.	LADBS			
GEO-3. Paleontological Resources Monitoring and Mitigation (EIR)						
1. Qualified Paleontologist. The project Applicant shall retain a Qualified Paleontologist to direct all mitigation measures related to paleontological resources. A qualified professional paleontologist is defined by the Society of Vertebrate Paleontology (SVP) standards (SVP 2010) as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced	The project Applicant shall provide HACLA with contractual documents illustrating that a Qualified Paleontologist has been retained to provide monitoring during ground-disturbing construction activities.	The Qualified Paleontologist shall be retained prior to issuance of grading permits. Monitoring and treatment, as necessary, shall	HACLA			

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<p>with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010).</p> <p>2. Paleontological Worker Environmental Awareness Program. Prior to the start of construction, the Qualified Paleontologist or their designee shall conduct a paleontological WEAP training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.</p> <p>3. Paleontological Monitoring. Full-time paleontological monitoring shall be conducted during ground-disturbing construction activities (i.e., grading, trenching, foundation work) within native (i.e., previously undisturbed) sediments of any depth in all project areas. Ground-disturbing activities that only impact artificial fill (i.e., previously disturbed) sediments do not require paleontological monitoring. Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The duration and timing of the monitoring will be determined by the Qualified Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to review and approval by HACLA. If the Qualified Paleontologist determines full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations has been reached, they may recommend monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that</p>	<p>The Qualified Paleontologist shall prepare and conduct a WEAP for all personnel carrying out ground disturbing construction activities. If new construction personnel that carry out ground disturbing activities are added throughout construction, an additional WEAP(s) will be held to train those personnel. Signed training logs from each WEAP shall be provided to HACLA.</p> <p>Paleontological monitoring shall be conducted throughout ground-disturbing activities, until the Qualified Paleontologist, in consultation with HACLA, determines that monitoring is no longer required.</p> <p>If paleontological resources are discovered, the Qualified Paleontologist shall halt work within 50-feet of the find, shall notify HACLA of the find, and shall investigate and make appropriate recommendations. If additional measures are recommended by the Qualified Paleontologist, HACLA shall review and approve additional work for evaluation and treatment efforts and to mitigate any impacts to eligible resources.</p> <p>The Qualified Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts and submit the report to HACLA.</p>	<p>occur throughout ground-disturbing activities.</p>				

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<p>time. In the event of a fossil discovery by the paleontological monitor, all work within a 50-foot radius of the find shall cease. The Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil(s) is (are) scientifically significant, the Qualified Paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources:</p> <p>a. Salvage of Fossils. If fossils are discovered, the paleontological monitor shall have the authority to halt or temporarily divert construction equipment within 50 feet of the find until the monitor and/or lead paleontologist evaluate the discovery and determine if the fossil may be considered significant. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits.</p> <p>b. Preparation and Curation of Recovered Fossils. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photographs, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist.</p>						

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<p>4. Final Paleontological Monitoring Report. Upon completion of ground-disturbing activity (and curation of fossils, if necessary), the Qualified Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any), and the scientific significance, and recommendations. The report shall be submitted to HACLA. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.</p>						
Hazards and Hazardous Materials						
HAZ-1. Voluntary Oversight Agreement with the Los Angeles County Fire Site Mitigation Unit (EIR/EIS)						
<p>Because contaminated soil is present on the project site, the project Applicant shall coordinate on-site remediation activities on the OSP Specific Plan Site and 327 Harbor Site with the Los Angeles County Fire Department (LACFD) Site Mitigation Unit (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:</p> <ul style="list-style-type: none"> ▪ All Environmental Site Assessments and subsurface investigation reports completed for the OSP Specific Plan Site and 327 Harbor Site 	<p>The project Applicant shall submit the required documentation to the LACFD SMU and enter into a Voluntary Oversight Agreement. The project Applicant shall comply with any activities required by LACFD SMU as part of the Voluntary Oversight Agreement. An approval letter from LACFD SMU shall be obtained and submitted to LADBS for verification.</p>	<p>Prior to the issuance of grading permits.</p>	<p>LACFD SMU, LADBS</p>			

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<ul style="list-style-type: none"> ▪ 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 <p>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.</p> <p>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 City of Los Angeles Department of Building and Safety (LADBS).</p> <p>It should also be noted that LACFD SMU may determine that the Los Angeles Regional Water Quality Control Board (RWQCB) or the 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.</p>						

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HAZ-2. Soil Management Plan (EIR/EIS)						
<p>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:</p> <ul style="list-style-type: none"> ▪ 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. <p>The SMP 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:</p> <ul style="list-style-type: none"> ▪ Stockpile management including stormwater pollution prevention and the installation of Best Management Practices ▪ Proper disposal procedures of contaminated materials 	<p>The project Applicant shall retain a PG or PE to prepare a SMP that includes the information specified in this mitigation measure. The SMP shall be submitted to LACFD SMU for review and approval. LADBS shall verify that the approved SMP has been submitted.</p>	<p>Prior to issuance of grading permits.</p>	<p>LACFD SMU, LADBS</p>			

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<ul style="list-style-type: none"> ▪ 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 <p>The project 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 project Applicant shall ensure the construction contractor implements the SMP during demolition, grading, and construction at the project site.</p>						
HAZ-3. Soil Remediation (EIR/EIS)						
<p>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</p>	<p>The PG or PE shall make recommendations for the proper removal and disposal of contaminated soils that exceed hazardous waste screening levels, if applicable. The PG or PE's recommendations shall be submitted to the LACFD SMU for approval. LADBS shall verify that the approved removal and disposal plans have been submitted.</p>	<p>Prior to issuance of grading permits.</p>	<p>LACFD SMU, LADBS</p>			

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<p>recommendations for remedial engineering controls, if appropriate.</p> <p>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.</p> <p>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.</p> <p>The project 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.</p> <p>LADBS shall review and approve the disposal recommendations and remedial engineering controls prior to issuing a grading permit.</p>						
HAZ-4. Construction Vapor Monitoring Plan (EIR/EIS)						
<p>The project 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:</p> <ul style="list-style-type: none"> ▪ 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, 	<p>The PG or PE shall prepare and submit a Construction Vapor Monitoring Plan to LACFD SMU for review and approval. The approved Construction Vapor Monitoring Plan shall be included in the HASP, which shall be signed by all construction personnel. LADBS shall verify that the approved Construction Vapor Monitoring plan has been submitted.</p>	<p>Prior to issuance of grading permits.</p>	<p>LACFD SMU, LADBS</p>			

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<p>and/or increasing ventilation within immediate work area where the elevated concentrations are detected;</p> <ul style="list-style-type: none"> ▪ 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. <p>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.</p> <p>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 LADBS prior to issuance of a grading permit.</p>						
HAZ-5. Vapor Mitigation System (EIR/EIS)						
<p>Where soil vapor is known to be present at chemical concentrations exceeding screening levels for sub-slab/soil gas (vapor) intrusion, the project 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 Site and 327 Harbor</p>	<p>The qualified environmental consultant shall prepare a soil vapor Human Health Risk Assessment and Vapor Mitigation Plan, if applicable. The Human Health Risk Assessment and Vapor Mitigation Plan shall be submitted to LACFD SMU</p>	<p>If required, the Human Health Risk Assessment and Vapor Mitigation Plan shall be approved by LACFD</p>	<p>LACFD SMU, LADBS</p>			

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<p>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.</p> <p>The Vapor Mitigation Plan shall include, but is not limited to:</p> <ul style="list-style-type: none"> ▪ Design specifications ▪ Material specifications ▪ Installation requirements ▪ Monitoring requirements <p>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).</p> <p>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 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.</p> <p>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</p>	<p>for review and approval. The approved Vapor Mitigation Plan including the engineering measures or institutional controls to be implemented shall be submitted to LADBS to verify that the recommended measures are included in the construction plans.</p> <p>The qualified environmental consultant shall verify that the recommended measures have been implemented and are properly functioning. Written verification shall be submitted to the LACFD SMU and LADBS.</p> <p>If required, a Soil Vapor Operations and Maintenance Plan shall be prepared and submitted to LACFD SMU for review and approval. LADBS shall verify that the Soil Vapor Operations and Maintenance has been submitted.</p>	<p>SMU and submitted to LADBS prior to issuance of building construction permits. Verification of efficacy of the Vapor Mitigation System and the Soil Vapor Operations and Maintenance Plan, if required, shall be submitted to LACFD SMU for review and approval and submitted to LADBS prior to the issuance of Certificates of Occupancy.</p>				

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<p>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.</p> <p>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 project Applicant shall implement the Operations and Maintenance Plan during occupancy at the project site.</p>						
Noise						
NOI-1. Construction Noise Reduction Measures (EIR/EIS)						
<p>The following measures shall be implemented at the project site during construction to minimize the community exposure to construction noise:</p> <ul style="list-style-type: none"> ▪ 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. 	<p>LADBS shall verify through project plans, specifications, and noise-generating equipment manufacturer submittals that noise will be controlled per the requirements of the mitigation measure. HACLA shall verify through field inspection that signs have been posted and temporary noise barriers have been installed.</p>	<p>Prior to the start of construction, including ground disturbing, activities.</p>	<p>HACLA, LADBS</p>			

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<ul style="list-style-type: none"> ▪ 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 sound transmission class (STC) 32 or higher. 						

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NOI-2. Stationary Recreational Noise Reduction Measures (EIR/EIS)						
<p>The following measure shall be included to minimize stationary recreational noise at the OSP Specific Plan Site:</p> <ul style="list-style-type: none"> ▪ Prior to holding the first amplified event at any new site with amplified sound (e.g., at the youth sports field and bandshell), HACL A 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 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, HACL A 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 	<p>HACL A or its designee shall retain a qualified sound system contractor to create a PA System Design Plan and verify that the PA system meets the recommendations of the PA System Design Plan.</p> <p>HACL A or its designee shall retain a qualified acoustical consultant to conduct an operational noise analysis of the final design plans for outdoor recreational uses. The operational noise analysis and design recommendations shall be submitted to HACL A for approval and to LADBS for verification during plan check.</p>	<p>The PA Design System Plan(s) shall be implemented prior to holding the first amplified event.</p> <p>The operational noise analysis for recreational uses shall be completed and approved prior to issuing construction permits for the recreational uses.</p>	<p>HACL A, LADBS</p>			

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<p>limited to, operational hour restrictions, setbacks, barriers, and other shielding techniques. HACLA shall verify these additional measures are included on the final site plan prior to issuing construction permits for the recreational uses.</p>						
NOI-3. Construction Vibration Reduction Measures (EIS)						
<p>Prior to the issuance of grading permits, the following measures shall be included as notes on all construction plans:</p> <ul style="list-style-type: none"> ▪ 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. 	<p>LADBS shall verify that the requirements of this measure are included on the construction plans.</p>	<p>Prior to the issuance of grading permits</p>	<p>LADBS</p>			
NOI-4. Exterior Noise Reduction Measures (EIS)						
<p>To mitigate exterior noise at future outdoor use areas along Harbor Boulevard, the following measures shall be required:</p> <ul style="list-style-type: none"> ▪ 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. 	<p>LADBS shall verify that the requirements of this measure are included in the project plans.</p>	<p>Prior to the issuance of construction permits.</p>	<p>LADBS</p>			

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NOI-5. Interior Noise Reduction Measures (EIS)						
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.	The qualified acoustical consultant shall submit written recommendations for building materials and design to HACLA for review and approval and the recommendations shall be incorporated into the building design. The recommendations shall be provided to LADBS to verify that the building plans incorporate the recommendations.	Prior to the issuance of building construction permits for Stage 7 and Stage 10 areas of the OSP Specific Plan Site.	HACLA, LADBS			
Transportation and Circulation						
T-1. Intersection Restriping (EIS)						
The following measures shall be implemented, upon approval by LADOT, to increase the space available for vehicle queueing at affected intersections: <ul style="list-style-type: none"> 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. 	If required and approved by LADOT, the intersections noted in this measure shall be restriped in accordance with LADOT requirements and under LADOT oversight.	During project construction activities, upon approval by LADOT	LADOT			
Tribal Cultural Resources						
TCR-1. Native American Monitoring by the Gabrielino Tongva Indians of California Tribal Council (EIR)						
Consistent with Mitigation Measure CUL-5 in Section 4.3, <i>Cultural Resources</i> , a Native American monitor representing	The project Applicant shall notify the Gabrielino Tongva Indians of California	Notification shall be provided at least 30-	HACLA			

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<p>the Gabrielino Tongva Indians of California Tribal Council shall be invited to monitor during ground-disturbing activities 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 the Native American monitor determines monitoring is no longer necessary based on soil conditions and negative findings, whichever occurs first. In the event a mutual agreement cannot be made between the Project Archaeologist and the Native American monitor to terminate monitoring services prior to the end of ground-disturbing activities, the Native American monitor shall be given the opportunity to continue monitoring for tribal cultural resources during ground-disturbing activities. The project Applicant shall notify the Gabrielino Tongva Indians of California Tribal Council at least 30 days prior to commencement of ground-disturbing construction activities and request monitoring services. The Tribe must respond to the request for monitoring within 30 days of the notification. The Applicant shall provide HACL A with a copy of the executed tribal monitoring agreement with the Gabrielino Tongva Indians of California Tribal Council prior to commencement of construction. If no response from the Gabrielino Tongva Indians of California Tribal Council is received within 30 days, project construction can commence without the monitoring services of the Gabrielino Tongva Indians of California Tribal Council for the duration of ground-disturbing construction activities.</p> <p>The Native American monitor shall prepare daily monitoring logs that provide the location, type and description of the ground-disturbing construction activities performed, soil types, and cultural materials, if discovered. The daily monitoring logs shall describe Native American artifacts, remains, and places of significance, as well as any Native American human remains or burial goods, if identified. The Native American monitor shall submit weekly updates to HACL A. In addition, the Native American monitor shall prepare and submit a summary statement upon completion</p>	<p>Tribal Council of project construction activities and request monitoring services. HACL A shall be included in the correspondence to verify that notification is provided in accordance with the requirements of this measure.</p> <p>If the tribe responds and requests monitoring, the Applicant shall provide HACL A a copy of the contract for monitoring services for verification.</p> <p>The Native American monitor shall prepare daily monitoring logs and submit weekly updates to HACL A for verification of monitoring activities during construction. The daily monitoring logs and a summary statement shall be submitted to the Project Archaeologist for inclusion in the Cultural Resources Monitoring Report.</p>	<p>days prior to the start of ground disturbance.</p> <p>Monitoring and weekly updates shall occur throughout ground-disturbing construction activities.</p> <p>Monitoring logs and the summary report shall be provided to the Project Archaeologist upon completion of monitoring.</p>				

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Mitigation Measure/ Condition of Approval (source)	Verification/Monitoring Requirements	Timing of Implementation	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<p>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.</p>						
<p>TCR-2. Consultation with the Gabrielino Tongva Indians of California Tribal Council in the Event of Inadvertent Discovery of Tribal Cultural Resources (EIR)</p>						
<p>In the event that cultural resources of Native American origin are identified during construction, work within a 100-foot radius of the find shall be halted and redirected. HACLA shall consult with the Project Archaeologist and initiate Native American consultation procedures with the project’s consulting tribes. If HACLA, in consultation with the Native American monitor representing the Gabrielino Tongva Indians of California Tribal Council, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with State guidelines and in consultation with the Gabrielino Tongva Indians of California Tribal Council and other consulting tribes. The mitigation plan may include, but would not be limited to, avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, and/or other mutually agreed upon measures. The mitigation plan shall be prepared within 30 days of discovery of the find(s) and approved by the HACLA Chief Executive Officer or their designee. Procedures for the unanticipated discovery of human remains and associated grave goods are outlined in Mitigation Measure CUL-7 in Section 4.3, <i>Cultural Resources</i>.</p>	<p>If tribal cultural resources are encountered during construction, the Native American monitor and Project Archaeologist shall halt work within a 100-foot radius of the find and shall notify HACLA. The find shall be evaluated by the Project Archaeologist and Native American monitor. If additional measures are recommended by the Project Archaeologist and Native American Monitor, HACLA shall review and approve additional work for evaluation and treatment efforts and to mitigate any impacts to eligible resources.</p>	<p>During ground-disturbing activities, as needed and if tribal cultural resources are identified. The mitigation plan, if required, shall be prepared within 30 days of discovery of the find(s).</p>	<p>HACLA</p>			

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TCR-3. Native American Monitoring by the Gabrieleño Band of Mission Indians – Kizh Nation (EIR)						
<p>Consistent with Mitigation Measure CUL-5 in Section 4.3, <i>Cultural Resources</i>, a Native American monitor representing the Gabrieleño Band of Mission Indians – Kizh Nation shall be invited to monitor during ground-disturbing activities 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 the Native American monitor determines monitoring is no longer necessary based on soil conditions and negative findings, whichever occurs first. In the event a mutual agreement cannot be made between the Project Archaeologist and the Native American monitor to terminate monitoring services prior to the end of ground-disturbing activities, the Native American monitor shall be given the opportunity to continue monitoring for tribal cultural resources during ground-disturbing activities. The project Applicant shall notify the Gabrieleño Band of Mission Indians – Kizh Nation at least 30 days prior to commencement of ground-disturbing construction activities and request monitoring services. The Tribe must respond to the request for monitoring within 30 days of the notification. The Applicant shall provide HACL A with a copy of the executed tribal monitoring agreement with the Gabrielino Tongva Indians of California Tribal Council prior to commencement of construction. If no response from the Gabrieleño Band of Mission Indians – Kizh Nation is received within 30 days, project construction can commence without the monitoring services of the Gabrieleño Band of Mission Indians – Kizh Nation for the duration of ground-disturbing construction activities.</p> <p>The Native American monitor shall prepare daily monitoring logs that will provide the location, type and description of the ground-disturbing construction activities performed, soil types, and cultural materials, if discovered. The daily monitoring logs shall describe Native American artifacts,</p>	<p>The project Applicant shall notify the Gabrieleño Band of Mission Indians – Kizh Nation of project construction activities and request monitoring services. HACL A shall be included in the correspondence to verify that notification is provided in accordance with the requirements of this measure.</p> <p>If the tribe responds and requests monitoring, the Applicant shall provide HACL A a copy of the contract for monitoring services for verification.</p> <p>The Native American monitor shall prepare daily monitoring logs and submit weekly updates to HACL A for verification of monitoring activities during construction. The daily monitoring logs and a summary statement shall be submitted to the Project Archaeologist for inclusion in the Cultural Resources Monitoring Report.</p>	<p>Notification shall be provided at least 30-days prior to the start of ground disturbance.</p> <p>Monitoring and weekly updates shall occur throughout ground-disturbing construction activities.</p> <p>Monitoring logs and the summary report shall be provided to the Project Archaeologist upon completion of monitoring.</p>	<p>HACL A</p>			

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<p>remains, and places of significance, as well as any Native American human remains or burial goods, if identified. The Native American monitor shall submit weekly updates to HACLA. 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.</p>						
<p>TCR-4. Consultation with the Gabrieleño Band of Mission Indians – Kizh Nation in the Event of Inadvertent Discovery of Tribal Cultural Resources</p>						
<p>In the event that cultural resources of Native American origin are identified during construction, work within a 100-foot radius of the find shall be halted and redirected. HACLA shall consult with the Project Archaeologist and initiate Native American consultation procedures with the project’s consulting tribes. If HACLA, in consultation with the Native American monitor representing the Gabrieleño Band of Mission Indians – Kizh Nation, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with State guidelines and in consultation with the Gabrieleño Band of Mission Indians – Kizh Nation and other consulting tribes. The mitigation plan may include, but would not be limited to, avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, and/or other mutually agreed upon measures. The mitigation plan shall be prepared within 30 days of discovery of the find(s) and approved by the HACLA Chief Executive Officer or their designee. Procedures for the unanticipated discovery of human remains and associated grave goods are outlined in Mitigation Measure CUL-7 in Section 4.3, <i>Cultural Resources</i>.</p>	<p>If tribal cultural resources are encountered during construction, the Native American monitor and Project Archaeologist shall halt work within a 100-foot radius of the find and shall notify HACLA. The find shall be evaluated by the Project Archaeologist and Native American monitor. If additional measures are recommended by the Project Archaeologist and Native American Monitor, HACLA shall review and approve additional work for evaluation and treatment efforts and to mitigate any impacts to eligible resources.</p>	<p>During ground-disturbing activities, as needed and if tribal cultural resources are identified. The mitigation plan shall be prepared within 30 days of discovery of the find(s).</p>	<p>HACLA</p>			
<p>TCR-5. Tribal Cultural Resource Finds Dispute Resolution</p>						
<p>In the event a resource(s) of Native American origin is identified during monitoring, including but not limited to</p>	<p>HACLA shall provide written notification to the Gabrielino Tongva Indians of</p>	<p>During ground-disturbing activities,</p>	<p>HACLA</p>			

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<p>projectile points, chipped stone, groundstone, beads, and shell artifacts, that cannot be directly associated with the Gabrielino Tongva Indians of California Tribal Council or the Gabrieleño Band of Mission Indians – Kizh Nation through analysis, such as deoxyribonucleic acid (DNA) analysis, HACLA shall request a consultation meeting with the Gabrielino Tongva Indians of California Tribal Council and the Gabrieleño Band of Mission Indians – Kizh Nation to consult on the disposition of the find(s). The tribes must respond within 30 days of the consultation request and the meeting shall occur no later than 45 days after HACLA transmits the request for a consultation meeting. As part of a good faith effort, HACLA shall reach out to the tribes via telephone up to two times during that 30-day period to attempt to schedule a consultation meeting. If any one tribe does not respond to HACLA’s consultation request within 30 days, HACLA may consult with the responding tribe as to the disposition of the find(s). If both tribes respond to HACLA’s consultation request within 30 days, HACLA shall consult with both tribes to determine final disposition of the find(s) and, if desired by the tribe(s), a reburial ceremony(ies).</p> <p>Once the consultation effort is complete, HACLA shall notify the Gabrielino Tongva Indians of California Tribal Council and the Gabrieleño Band of Mission Indians – Kizh Nation in writing as to the final disposition of the find(s). The timing and location of any reburial efforts shall be determined by HACLA based on the construction schedule and availability of a reburial location. Construction activities may continue on site outside the 100-foot radius during the consultation effort and may resume at the location of the find(s) once the find(s) has been secured. In the event a mutual agreement on the treatment of the resource(s) cannot be made between the Gabrielino Tongva Indians of California Tribal Council and the Gabrieleño Band of Mission Indians – Kizh Nation within 30 days of the initial consultation meeting, the artifact(s) under review shall be reinterred on site in a location free from future ground-disturbing construction activities. In the event that neither tribe consults with HACLA</p>	<p>California Tribal Council or the Gabrieleño Band of Mission Indians – Kizh Nation of tribal cultural resources finds during construction. HACLA shall consult with both parties regarding the treatment and disposition of such finds, in accordance with the procedures outlined in this mitigation measure.</p>	<p>as needed, if tribal cultural resources are identified.</p>				

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<p>on the find(s), HACLA shall rebury the artifact(s) on site in a location free from future ground-disturbing construction activities. This measure does not apply to the finding of human remains which must comply with California Health and Safety Code 7050.5.</p>						