6 Alternatives

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6(a) as follows:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.

The CEQA Guidelines indicate that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries […], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site […]

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered.

6.1 Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. The project objectives include the following:

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

Based on the analyses provided in Section 4, *Environmental Impact Analysis*, implementation of the project would result in significant impacts that cannot be feasibly mitigated to below a level of significance with respect to historical resources, construction vibration (pursuant to significance threshold for human annoyance), and operational noise sources (pursuant to significance threshold for stationary recreational noise). Additionally, the project would result in significant impacts that would be reduced to a less than significant level with implementation of mitigation measures with regard to the following: aesthetics, air quality, archaeological resources and human remains, geology and soils, hazards and hazardous materials, construction noise, and tribal cultural resources.

Based on the significant environmental impacts of the project, the objectives established for the project, and the feasibility of the alternatives considered, the alternatives to the project listed below were selected for evaluation:

- **Alternative 1, No Project:** Alternative 1 assumes that the project would not be approved, no new development would occur within the project site, and the existing environment would be maintained. However, HACLA would continue to maintain the site in accordance with its standard practices and policies. Residential unit renovations would continue to occur over the long term as units become vacant and turn over. Thus, the physical conditions of the project site would generally remain the same as existing conditions.

- **Alternative 2, Historic Rehabilitation:** Under the Historic Rehabilitation Alternative (Alternative 2), the existing Rancho San Pedro Complex buildings would not be demolished, but rather would be rehabilitated and would continue to be used for public housing by existing/future residents. The existing housing is generally substandard in quality and does not meet the United States Department of Housing and Urban Development (HUD) unit size standards. Existing physical deficiencies would require building upgrades in the long term if the buildings were to remain in use, as described in the Physical Needs Assessment completed for the existing buildings in 2017 (EMG 2017). Alternative 2 would include the necessary extensive repairs to ensure the structures are up to current California Historic Building Code standards; ensure seismic safety and integrity; remediate suspect asbestos containing materials (ACM) and lead-based paint (LBP) contaminants; modernize building heating, ventilation, and air conditioning (HVAC) systems and appliances to the extent feasible; upgrade and repair electrical systems; remediate Americans with Disabilities Act (ADA) accessibility deficiencies; exterminate any present termites and remediate termite damage; and repair deficient sewer and water infrastructure serving the site. Rehabilitation would be completed in conformance with the Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary's Standards) (National Park Service 2017) and in accordance with the California Historic Building Code. A total of 478 residential units would be provided on the OSP Specific Plan Site, consistent with current conditions. Under this alternative, the 327 Harbor Site would be developed with the same land uses as described for the proposed project, which would consist of a four-story, 47-unit multi-family affordable housing development.
- **Alternative 3, Partial Preservation:** Under the Partial Preservation Alternative (Alternative 3), the original portion of the Rancho San Pedro Complex, completed in 1942, would be preserved and rehabilitated in accordance with the Secretary's Standards and in accordance with the California Historic Building Code, as described above under Alternative 2. Building deficiencies identified under Alternative 2 would be remediated, and the existing, original Rancho San Pedro Complex buildings consisting of 284 existing residential units would be preserved and rehabilitated, and would continue to serve as public housing. The Rancho San Pedro Complex expansion that was completed in 1953, which includes 194 existing residential units, would be demolished in phases and redeveloped with new multi-family housing, amenities, and commercial retail uses. There would be a total of 1,160 residential units on the OSP Specific Plan Site. Of these, 729 units would be newly constructed residential units, including 390 market-rate rental units, 275 affordable units, 32 market-rate homeownership units, and 32 affordable homeownership units. In addition, 45,000 square feet (sf) of commercial uses, 61,500 sf of Neighborhood Serving Uses, and 2 acres of public open space would be developed. The 327 Harbor Site would be developed with 47 residential units, consistent with the proposed project.

Table 6-1 provides a summary comparison of the development characteristics of the proposed project and each of the alternatives considered. Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such rejected alternatives are described in Section 6.2, *Alternatives Considered but Rejected*.

Table 6-1 Comparison of Project and Alternatives Buildout Characteristics

Feature	Proposed Project	Alternative 1: No Project	Alternative 2: Historic Rehabilitation	Alternative 3: Partial Preservation
OSP Specific Plan Site				
Residential Units				
Affordable Rental	996	478	478	753
Market Rate Rental	480	0	0	390
Affordable Ownership	45	0	0	32
Market Rate Ownership	32	0	0	32
Total:	**1,553**	**478**	**478**	**1,207**
Commercial Retail (sf)	45,000	0	0	45,000
Neighborhood Serving (sf)	85,000	0	0	61,500
Total Floor Area (sf)	1,946,163	500,303	500,303	1,369,180
Floor Area Ratio	2.1	0.57	0.57	1.51
Open Space (sf)				
Private Open Space	77,650	838	838	60,350
Common Open Space	143,050	144,884	144,884	213,337
Publicly Accessible Open Space	230,000	0	0	80,000
Total:	**450,700**	**145,722**	**145,722**	**353,687**
Vehicle Parking Spaces	2,092	255	255	1,450
Bicycle Parking Spaces	1,600	6	6	208
Maximum Height	8 stories (180 feet)	2 stories (20 feet)	2 stories (20 feet)	8 stories (180 feet)
Soil Export (cy)	378,645	0	0	154,196
Building demolition (sf)	500,303	0	0	212,940
327 Harbor Site				
Residential Units	47	0	47	47
Gross Building Area (sf)	66,210	0	66,210	66,210
Floor Area (sf)	48,270	0	48,270	48,270
Floor Area Ratio	2.15:1	0	2.15:1	2.15:1
Open Space (sf)				
Private Open Space	2,100	0	2,100	2,100
Common Open Space	4,906	0	4,906	4,906
Publicly Accessible Open Space	0	0	0	0
Total:	**7,006**	**0**	**7,006**	**7,006**
Vehicle Parking Spaces	45	0	45	45
Bicycle Parking Spaces	48	0	48	48
Maximum Height	4 stories (70.5 feet)	0	4 stories (70.5 feet)	4 stories (70.5 feet)
Soil Export (cy)	4,300	0	4,300	4,300

cy = cubic yards; sf = square feet

6.2 Alternatives Considered but Rejected

During the preparation of this EIR/EIS, three alternatives were considered but rejected. These alternatives and the reasons that they were eliminated from further consideration are described below.

6.2.1 Alternative Site Location

Section 15126.6(f)(2) of the CEQA Guidelines provides guidance regarding alternative location(s) for a project. Selecting another location for the project should be considered if doing so would allow significant impacts of the project to be avoided or substantially lessened. If no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. This alternative was initially considered but rejected as infeasible. The OSP Specific Plan Site has been identified in the San Pedro Community Plan as distressed, under-utilized, and an opportunity area for redevelopment (City of Los Angeles 2017). Similarly, the General Plan Housing Element identifies the OSP Specific Plan Site as a "pipeline development" for additional housing units (City of Los Angeles 2021a). Therefore, the project site has already been identified in City planning documents for redevelopment. Additionally, this alternative was deemed infeasible as HACLA does not own or control another site of comparable size that could accommodate the proposed uses and project objectives. Also, it is not feasible for HACLA to obtain control of another site that would help meet the project objectives because there is no identified funding source that could be used to purchase another site, even if one were available.

6.2.2 Reduced Density Alternative

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

The Reduced Density Alternative would not reduce significant impacts to historical resources on the OSP Specific Plan site, nor would it reduce construction or operational noise impacts across the project site to a level of less than significant. The phased demolition of the existing Rancho San Pedro Complex would result in significant and unavoidable impacts to historical resources, similar to the proposed project. Additionally, demolition of the existing uses, grading, building construction, and paving activities for the Reduced Density Alternative would require the same equipment as the proposed project, including backhoes, excavators, loaders, and surfacing equipment. Such equipment would be necessary to demolish the existing development, grade the project site, and haul away debris. Given the project site's proximity to nearby sensitive uses, even with implementation of Mitigation Measures NOI-1 and NOI-2 and a shorter construction period of approximately nine years, the daily levels of construction noise would be similar to that described in Section 4.9, *Noise*, for the

proposed project. Likewise, development of new public open space uses that may include events with amplified sound, such as sports games and live music, would result in similar operational noise impacts as the proposed project. Thus, the Reduced Density Alternative would not eliminate or reduce significant and unavoidable impacts related to historical resources and construction and operational noise under the proposed project.

6.2.3 Reduced Daily Construction Hours Alternative

The Reduced Daily Construction Hours Alternative would involve the same buildings and amenities as the proposed project but would limit daily construction hours to reduce construction noise. The intent of this alternative is to reduce potential impacts associated with construction noise by limiting the loudest construction activities during the most noise-sensitive hours of the day, such as early mornings and evenings. Heavy-duty and particularly noisy equipment (e.g., backhoes, loaders, jackhammers, etc.) would be prohibited from operating before 8:00 a.m. and after 4:00 p.m. on weekdays and before 9:00 a.m. and after 4:00 p.m. on Saturdays. Similar to the proposed project, no construction would occur on Sundays and federal holidays. As a comparison, Los Angeles Municipal Code (LAMC) Section 41.40 allows all construction equipment to be used from 7:00 a.m. to 9:00 p.m. on weekdays and from 8:00 a.m. to 6:00 p.m. on Saturdays. The Reduced Daily Construction Hours Alternative would result in a longer overall construction period due to the reduced daily construction hours. Given the project site's proximity to nearby sensitive uses, even with implementation of Mitigation Measures NOI-1 and NOI-2 and reduced construction hours, the daily levels of construction noise would be similar to that described in Section 4.9, *Noise*, for the proposed project. Likewise, development of new public open space uses that may include events with amplified sound, such as sports games and live music, would result in similar operational noise impacts as the proposed project. Thus, the Reduced Daily Construction Hours Alternative would not eliminate or reduce significant and unavoidable impacts related to construction and operational noise under the proposed project, nor would this alternative eliminate or reduce significant and unavoidable impacts to historical resources or associated with construction vibration.

6.3 Alternatives Analysis Format and Methodology

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the project objectives would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section 4, *Environmental Impact Analysis*, assuming that the alternative would implement the same project design features and mitigation measures identified in Section 4, *Environmental Impact Analysis*, if applicable.
- Post-project design feature(s) and post-mitigation significant and non-significant environmental impacts of the alternative and the project are compared for each environmental issue as follows:
  - Reduced: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the project, the comparative impact is said to be "reduced."
  - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the project, the comparative impact is said to be "greater."

- Similar: Where the net impact of the alternative and project would be roughly equivalent, the comparative impact is said to be “similar.”

- The comparative analysis of the impacts is followed by a general discussion of whether the purpose and basic project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the project and each of the analyzed alternatives is provided in Table 6-2.

Table 6-2 Comparison of Impacts Associated with the Alternatives

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Historic Rehabilitation	Alternative 3: Partial Preservation
Aesthetics				
Scenic Vistas	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Scenic Highways	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Visual Character and Quality	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS with Mitigation)	Greater (LTS with Mitigation)
Light and Glare	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS with Mitigation)	Reduced (LTS with Mitigation)
Air Quality				
Criteria Pollutant Emissions				
Construction	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS with Mitigation)	Reduced (LTS with Mitigation)
Operation	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS with Mitigation)
Toxic Air Contaminants				
Construction	LTS	Reduced (No Impact)	Reduced (LTS with Mitigation)	Reduced (LTS with Mitigation)
Operation	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Cultural Resources				
Historical Resources	Significant and Unavoidable	Reduced (No Impact)	Reduced (LTS)	Reduced (Significant and Unavoidable)
Archaeological Resources	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS with Mitigation)	Reduced (LTS with Mitigation)
Human Remains	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS with Mitigation)	Reduced (LTS with Mitigation)
Geology and Soils				
Geologic and Soil Hazards	LTS with Mitigation	Reduced (LTS)	Reduced (LTS)	Reduced (LTS with Mitigation)
Paleontological Resources	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS with Mitigation)	Reduced (LTS with Mitigation)
Greenhouse Gas Emissions				
Greenhouse Gas Emissions	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Hazards and Hazardous Materials				
Construction	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS with Mitigation)	Reduced (LTS with Mitigation)
Operation	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Hydrology and Water Quality				
Surface Water				
Construction	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Operation	LTS	Reduced (No Impact)	Similar (LTS)	Similar (LTS)

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Historic Rehabilitation	Alternative 3: Partial Preservation
Groundwater				
Construction	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Operation	LTS	Reduced (LTS)	Reduced (LTS)	Reduced (LTS)
Land Use and Planning				
Division of an Established Community	LTS	Reduced (No Impact)	Similar (LTS)	Similar (LTS)
Conflict with Land Use Plans and Policies	LTS	Reduced (No Impact)	Similar (LTS)	Similar (LTS)
Noise and Vibration				
Noise				
Construction	Significant and Unavoidable	Reduced (No Impact)	Reduced (Significant and Unavoidable)	Reduced (Significant and Unavoidable)
Operation	Significant and Unavoidable	Reduced (No Impact)	Reduced (LTS)	Similar (Significant and Unavoidable)
Vibration				
Construction	Significant and Unavoidable	Reduced (No Impact)	Reduced (Significant and Unavoidable)	Reduced (Significant and Unavoidable)
Operation	LTS	Reduced (No Impact)	Similar (LTS)	Similar (LTS)
Population and Housing				
Construction	LTS	Reduced (No Impact)	Increased (LTS)	Similar (LTS)
Operation	LTS	Reduced (No Impact)	Similar (LTS)	Similar (LTS)
Public Services				
Fire Protection				
Construction	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Operation	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Police Protection				
Construction	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Operation	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Schools				
Construction	LTS	Reduced (No Impact)	Reduced (LTS)	Similar (LTS)
Operation	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Historic Rehabilitation	Alternative 3: Partial Preservation
Libraries				
Construction	LTS	Reduced (No Impact)	Reduced (LTS)	Similar (LTS)
Operation	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Recreation				
Construction	LTS	Reduced (No Impact)	Similar (LTS)	Similar (LTS)
Operation	LTS	Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Transportation				
Conflict with Plans, Policies, and Programs	LTS	Increased (LTS)	Increased (LTS)	Increased (LTS)
Vehicle Miles Traveled	LTS	Reduced (No Impact)	Reduced (LTS)	Similar (LTS)
Design Hazards	LTS	Increased (LTS)	Increased (LTS)	Similar (LTS)
Emergency Access	LTS	Reduced (No Impact)	Reduced (LTS)	Similar (LTS)
Tribal Cultural Resources				
Tribal Cultural Resources	LTS with Mitigation	Reduced (No Impact)	Reduced (LTS with Mitigation)	Reduced (LTS with Mitigation)
Utilities and Service Systems				
Water				
Construction		Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Operation		Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Wastewater				
Construction		Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Operation		Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Solid Waste				
Construction		Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Operation		Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Electric Power, Natural Gas, and Telecommunications				
Construction		Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)
Operation		Reduced (No Impact)	Reduced (LTS)	Reduced (LTS)

LTS = Less than Significant

6.4 Alternative 1: No Project Alternative

6.4.1 Description

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1 assumes that the proposed project would not be approved, no new permanent development would occur within the project site, and the existing conditions, as described in Section 2, *Project Description*, and Section 3, *Environmental Setting*, would be maintained. However, HACLA would continue to maintain the site in accordance with its standard practices and policies and abide by regulatory requirements such as the need for seismic upgrades. Residential unit renovations would continue to occur over the long term as units become vacant and turn over. Thus, the physical conditions of the project site would generally remain the same as existing conditions. Specifically, the existing Rancho San Pedro housing complex would remain on the OSP Specific Plan Site, and the 327 Harbor Site would remain vacant and undeveloped. No new development would occur under the No Project Alternative.

6.4.2 Impact Analysis

a. Aesthetics

Scenic Vistas

Under Alternative 1, the existing conditions of the project site would continue to be maintained. Alternative 1 would not involve new development and would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. Because no new development would occur, public views of the western foothills of the Palos Verdes Peninsula, Pacific Ocean, and other scenic vistas would remain unchanged. As such, no impact to scenic vistas would occur under Alternative 1. In contrast, the proposed project would result in a less than significant impact to scenic vistas. Impacts to scenic vistas would be reduced under Alternative 1 in comparison to the proposed project.

Scenic Highways

There are no State-designated Scenic Highways within or visible from the project site. Although Harbor Boulevard is a locally-designated scenic corridor, no new development would occur under Alternative 1. Alternative 1 would include necessary renovations to the existing buildings on the OSP Specific Plan Site, which would include seismic upgrades, painting and addressing any architectural damages to the buildings' façades; however, such renovations would not affect existing views of scenic resources. As such, under Alternative 1, no impact to scenic resources, including trees, rock outcroppings, and historic buildings, within a designated scenic highway would occur, and impacts would be similar to the proposed project.

Visual Character and Quality

Under Alternative 1, the existing conditions of the project site would continue to be maintained. Alternative 1 would not involve new development and would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site, which would include seismic upgrades, painting

and addressing any architectural damages to the buildings' façades. Because such renovations would not affect the existing visual character and quality of the project site, no impact to visual character and quality would occur under Alternative 1 and Mitigation Measure AES-1 would not be required. As such, Alternative 1 would not conflict with applicable policies that govern scenic quality and no impact to visual character and quality would occur. In contrast, the proposed project would result in a less than significant impact to visual character and quality with implementation of mitigation. Impacts to visual quality would be reduced under Alternative 1 in comparison to the proposed project.

Light and Glare

Under Alternative 1, the existing conditions of the project site would continue to be maintained. Alternative 1 would not involve new development and would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. Therefore, no new sources of light or glare during project construction would be introduced. As such, no impact associated with light or glare would occur under Alternative 1 and Mitigation Measure AES-2 would not be required. In contrast, the proposed project would result in a less than significant impact related to light and glare with implementation of mitigation.

Additionally, because Alternative 1 would not include new development on the project site, no impact related to light or glare would occur during operation of this alternative. In contrast, the proposed project would result in a less than significant impact to light and shading. Impacts related to light and glare would be reduced under Alternative 1 in comparison to the proposed project.

Additionally, no changes to the amount of shading at nearby shadow sensitive land uses would occur under Alternative 1, as building heights would remain consistent with current conditions. Therefore, there would be no impacts related to shade and shadow, in contrast to the less than significant impacts of the proposed project. Shading impacts under Alternative 1 would be reduced in comparison to the proposed project.

b. Air Quality

Alternative 1 would not alter the existing on-site uses or involve new development and would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. Likewise, Alternative 1 would not generate additional operational emissions beyond those generated under existing conditions. As such, no air quality impact would occur under Alternative 1, and Mitigation Measures AQ-1 and AQ-2 would not be required. In contrast, the proposed project would result in a less than significant impact to air quality with implementation of mitigation. Impacts to air quality would be reduced under Alternative 1 in comparison to the proposed project.

c. Cultural Resources

Historical Resources

Alternative 1 would not alter the existing on-site uses or involve demolition of the Rancho San Pedro Complex on the OSP Specific Plan Site, which is considered a historical resource pursuant to CEQA. Alternative 1 would be limited to necessary renovations to the existing Rancho San Pedro buildings. Alternative 1 also would not impact any other historical resource in the project vicinity. As such, no impact to historical resources would occur under Alternative 1, and Mitigation Measures CUL-1 and CUL-2 would not be required. In contrast, the proposed project would result in a significant and unavoidable impact to the Rancho San Pedro Complex, even with implementation of mitigation.

Impacts to historical resources would be reduced under Alternative 1 in comparison to the proposed project.

Archaeological Resources

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No ground-disturbing construction activities would occur. As such, no impact to archaeological resources would occur under Alternative 1, and Mitigation Measures CUL-3 through CUL-6 would not be required. In contrast, the proposed project would result in a less than significant impact to archaeological resources with implementation of mitigation. Impacts to archaeological resources would be reduced under Alternative 1 in comparison to the proposed project.

Human Remains

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No ground-disturbing construction activities would occur. As such, no impact to human remains would occur under Alternative 1, and Mitigation Measure CUL-7 would not be required. In contrast, the proposed project would result in a less than significant impact to human remains with implementation of mitigation. Impacts to human remains would be reduced under Alternative 1 in comparison to the proposed project.

d. Geology and Soils

Geologic and Soil Hazards

As discussed in Section 4.4, *Geology and Soils*, although the project site is not subject to fault rupture, the site is within a seismically active region and could be subject to strong ground shaking in the event of an earthquake at one of the local or regional faults. Because Alternative 1 would not alter the existing on-site uses and no ground-disturbing construction activities would occur, Mitigation Measures GEO-1 and GEO-2 would not be implemented under Alternative 1. Existing structures on the OSP Specific Plan Site would be renovated over time, which would include seismic retrofitting to reduce the risk of loss, injury, or death due to seismic hazards. Therefore, Alternative 1 would result in a less than significant impact related to geologic and soil hazards. In contrast, the proposed project would result in a less than significant impact with implementation of mitigation. Impacts related to geologic and soil hazards would be reduced under Alternative 1 in comparison to the proposed project.

Paleontological Resources

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No ground-disturbing construction activities would occur. As such, no impact to paleontological resources would occur under Alternative 1, and Mitigation Measure GEO-3 would not be required. In contrast, the proposed project would result in a less than significant impact to paleontological resources with implementation of mitigation. Impacts to paleontological resources would be reduced under Alternative 1 in comparison to the proposed project.

e. Greenhouse Gas Emissions

Alternative 1 would not alter the existing on-site uses and no new development would occur; activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. Therefore, Alternative 1 would not generate additional greenhouse gas (GHG) emissions beyond those generated under existing conditions. As such, no impact associated with GHG emissions would occur under Alternative 1. In contrast, the proposed project would result in a less than significant impact associated with GHG emissions with implementation of mitigation. Impacts related to GHG emissions would be reduced under Alternative 1 in comparison to the proposed project.

f. Hazards and Hazardous Materials

Alternative 1 would not alter the existing on-site uses and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No ground-disturbing construction activities would occur. Under Alternative 1, the existing conditions of the project site would continue to be maintained, including the use of hazardous materials commonly used in residential developments, such as cleaning agents, paints, pesticides, and materials used for landscaping, which do not typically involve the use or storage of large quantities of hazardous materials. Additionally, existing soils at both the OSP Specific Plan Site and the 327 Harbor Site are contaminated, and buildings on the OSP Specific Plan Site contain LBP and ACM. As existing residential units on the OSP Specific Plan Site are vacated, ACM and LBP within individual units would be remediated in conformance with the applicable regulations, similar to the proposed project. Although contaminated soils are present on the project site, because no construction activities, including soil grading and building demolition, would occur under Alternative 1, no impact related to the release of hazardous materials would occur, and Mitigation Measures HAZ-1 through HAZ-5 would not be required. Therefore, Alternative 1 would result in less than significant impacts related to hazards and hazardous materials. In contrast, the proposed project would result in a less than significant hazardous materials impact with implementation of mitigation. Impacts related to hazardous materials would be reduced under Alternative 1 in comparison to the proposed project.

Additionally, no construction activities or changes to operation of the project site would occur under Alternative 1. Therefore, no impact to Harbor Boulevard or Pacific Avenue, nearby designated evacuation routes, would occur. In contrast, the proposed project would result in less than significant impacts to emergency evacuation. Impacts to emergency evacuation would be reduced under Alternative 1 compared to the proposed project.

g. Hydrology and Water Quality

Alternative 1 would not alter the existing on-site uses and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No ground-disturbing construction activities would occur. Therefore, no construction-related runoff would occur that would result in degradation of surface water and groundwater quality. Additionally, Alternative 1 would not affect the amount of impervious surface on the project site, and therefore, no change in drainage patterns, stormwater runoff, or groundwater infiltration would occur. As such, under Alternative 1, there would be no impact related to hydrology and water quality, in comparison to the proposed project's less than significant impacts. Impacts related to hydrology and water quality would be reduced under Alternative 1 in comparison to the proposed project.

h. Land Use and Planning

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No changes to the physical or operational characteristics of the project site would occur. As such, no impact associated with conflicts with land use plans or regulations would occur. In contrast, the proposed project would result in less than significant impacts related to land use and planning. Impacts related to land use and planning would be reduced under Alternative 1 in comparison to the proposed project.

i. Noise and Vibration

Noise

Alternative 1 would not alter the existing on-site uses or involve new development; activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. Therefore, Alternative 1 would not generate noise beyond existing levels. As such, no noise impact would occur under this alternative, and Mitigation Measures NOI-1 and NOI-2 would not be required. In contrast, the proposed project would result in significant and unavoidable construction and operational noise impacts for stationary recreational uses. Impacts related to noise would be reduced under Alternative 1 in comparison to the proposed project.

Vibration

Alternative 1 would not alter the existing on-site uses or new development; activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. Therefore, Alternative 1 would not generate vibration beyond existing levels. As such, no vibration impact would occur under Alternative 1, and Mitigation Measure NOI-3 would not be required. In contrast, the proposed project would result in significant and unavoidable impacts related to human annoyance from construction-related vibration. Operational vibration-related impacts under the proposed project would be less than significant. Impacts related to vibration would be reduced under Alternative 1 in comparison to the proposed project.

j. Population and Housing

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No changes to the physical or operational characteristics of the project site would occur. Therefore, Alternative 1 would not induce population growth or displace existing people or housing. Additionally, Alternative 1 would not help accommodate the projected population growth in the city of Los Angeles. As such, no impact associated with population or housing would occur under Alternative 1. In contrast, the proposed project would result in less than significant impacts related to population and housing. Impacts related to population and housing would be reduced under Alternative 1 in comparison to the proposed project.

k. Public Services

Fire Protection

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No changes to the physical or operational characteristics of the project site would occur. Therefore, there would be no increase in the service population at the project site and Alternative 1 would not result in the need for new or altered fire station facilities. As such, no impact associated with fire protection would occur under Alternative 1. In contrast, the proposed project would result in less than significant impacts related to fire protection. Impacts to fire protection would be reduced under Alternative 1 in comparison to the proposed project.

Police Protection

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No changes to the physical or operational characteristics of the project site would occur. Therefore, there would be no increase in the service population at the project site and Alternative 1 would not result in the need for new or altered police station facilities. As such, no impact associated with police protection would occur under Alternative 1. In contrast, the proposed project would result in less than significant impacts related to police protection. Impacts to police protection would be reduced under Alternative 1 in comparison to the proposed project.

Schools

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No changes to the physical or operational characteristics of the project site would occur. Therefore, there would be no increase in the service population at the project site and Alternative 1 would not result in the need for new or altered school facilities. As such, no impact associated with schools would occur under Alternative 1. In contrast, the proposed project would result in less than significant impacts related to schools. Impacts to schools would be reduced under Alternative 1 in comparison to the proposed project.

Libraries

Under Alternative 1, the existing conditions of the project site would continue to be maintained and no changes to the physical or operational characteristics of the project site would occur. Therefore, there would be no increase in the service population at the project site and Alternative 1 would not result in the need for new or altered library facilities. As such, no impact associated with libraries would occur under Alternative 1. In contrast, the proposed project would result in less than significant impacts related to libraries. Impacts to libraries would be reduced under Alternative 1 in comparison to the proposed project.

l. Recreation

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No changes to the physical or operational characteristics of the project site would occur.

Therefore, there would be no increase in the service population at the project site and Alternative 1 would not result in the need for new or altered parks or recreational facilities. As such, no impact associated with recreation would occur under Alternative 1. In contrast, the proposed project would result in less than significant impacts related to recreation. Impacts to recreation would be reduced under Alternative 1 in comparison to the proposed project.

m. Transportation

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No changes to the physical or operational characteristics of the project site would occur. Because Alternative 1 would not develop new or additional land uses on the project site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within or near the project site. As such, no impact would occur with respect to vehicle miles traveled (VMT) and emergency access, in comparison to the proposed project's less than significant impacts.

Alternative 1 would not include the transportation improvements, such as a mobility hub and new bicycle lanes and pedestrian infrastructure, which the proposed project includes within and surrounding the OSP Specific Plan Site. Therefore, although Alternative 1 would not specifically conflict with circulation system plans, it would be less compatible with these plans as compared to the proposed project. Under Alternative 1, the existing roadways and driveways serving the OSP Specific Plan Site would be maintained and consistent with current conditions. Proposed project improvements such as new bicycle lanes, traffic calming features, enhanced crosswalks, and new signals would not be included under Alternative 1. The proposed project would reduce the number of driveways/curb cuts at the OSP Specific Plan Site from 31 under existing conditions to 15, which would reduce the opportunities for pedestrians and bicycles to interact with vehicles. While Alternative 1 would not increase design hazards compared to existing conditions and would result in a less than significant impact, Alternative 1 would not include the abovementioned improvements and would have increased impacts compared to the proposed project.

n. Tribal Cultural Resources

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No ground-disturbing construction activities would occur. As such, no impact to tribal cultural resources would occur under Alternative 1, and Mitigation Measures TCR-1 through TCR-5 would not be required. In contrast, the proposed project would result in a less than significant impact to tribal cultural resources with implementation of mitigation. Impacts to tribal cultural resources would be reduced under Alternative 1 in comparison to the proposed project.

o. Utilities and Service Systems

Water Supply/Facilities

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No new development or change in land use would occur. Therefore, water demand would not change compared to existing conditions on the project site. As such, no impact to water supply or infrastructure would occur under Alternative 1, in contrast to the proposed project's less than

significant impacts. Impacts to water supply and facilities would be reduced under Alternative 1 in comparison to the proposed project.

Wastewater Demand/Facilities

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No new development or change in land use would occur. Therefore, wastewater generation would not change compared to existing conditions on the project site. As such, no impact associated with wastewater would occur under Alternative 1, in contrast to the proposed project's less than significant impacts. Impacts to wastewater facilities would be reduced under Alternative 1 in comparison to the proposed project.

Solid Waste

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No new development or change in land use would occur. Therefore, solid waste generation would not change compared to existing conditions on the project site. As such, no impact related to solid waste would occur under Alternative 1, in contrast to the proposed project's less than significant impacts. Impacts related to solid waste would be reduced under Alternative 1 in comparison to the proposed project.

Electric Power, Natural Gas, and Telecommunications Infrastructure

Under Alternative 1, the existing conditions of the project site would continue to be maintained and activities would be limited to necessary renovations to the existing buildings on the OSP Specific Plan Site. No new development or change in land use would occur. Therefore, electric power, natural gas, and telecommunications infrastructure demand would not change compared to existing conditions on the project site. As such, no impact to electric power, natural gas, and telecommunications infrastructure would occur under Alternative 1, in contrast to the proposed project's less than significant impacts. Impacts to electric power, natural gas, and telecommunications infrastructure would be reduced under Alternative 1 in comparison to the proposed project.

6.4.3 Comparison of Impacts

Alternative 1 would eliminate the proposed project's significant and unavoidable impacts with respect to historical resources on the OSP Specific Plan Site, as the existing Rancho San Pedro Complex buildings would remain in place. In addition, Alternative 1 would also avoid the project's significant and unavoidable construction and operational noise impacts and construction vibration impacts. Impacts associated with the majority of environmental issues would also be less than those of the proposed project. However, as described above, impacts related to consistency with transportation plans and policies and transportation safety, while still less than significant, would be increased compared to the proposed project.

6.4.4 Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings on the OSP Specific Plan Site would remain, and no new development would occur on the OSP Specific Plan Site or 327 Harbor Site. As such, Alternative 1 would not meet the underlying purpose of the project, which is to redevelop Rancho San Pedro to transform the community into a mixed-income, mixed-use neighborhood for current and future

residents and increase the amount of affordable housing provided on the project site. Furthermore, Alternative 1 would not meet the majority of the project objectives, as described below.

Alternative 1 would partially meet the following objective:

- Ensure existing tenants' first right to re-occupy units appropriate to household size through phasing of development and providing a mix of low- and moderate-income units.
  - No tenants would be displaced under Alternative 1. Therefore, the intent of part of this objective would be met. However, a mix of low- and moderate-income units would not be provided on the project site as no new development would occur.
- Improve the housing stock in the community by demolishing existing buildings which contain lead and asbestos.
  - No buildings would be demolished in this alternative; however, the existing buildings would be improved as required by applicable regulations, and lead and asbestos would be remediated consistent with HACLA's building maintenance policies. Therefore, this objective would be partially met.

Alternative 1 would not meet the following objectives:

- Implement the policies of the City of Los Angeles General Plan Framework Element, the SCAG RTP/SCS, and the San Pedro Community Plan that encourage growth in urban infill areas to improve mobility options, enhance pedestrian opportunities, and reduce auto dependence.
  - Alternative 1 would maintain the existing residential units and parking configuration at the OSP Specific Plan Site and would not develop the 327 Harbor Site. It would not encourage growth on the infill project site or include the mixed uses and active transportation or public transit improvements that would be provided by the proposed project. Therefore, this alternative would not improve mobility options, enhance pedestrian opportunities, or reduce residents' dependency on automobiles as no new development would occur.
- Provide a substantial increase in the number of affordable housing units, consistent with the goals of HACLA's 25-Year Vision Plan, the San Pedro Neighborhood Transformation Plan, and the City's Housing Element to expand the supply of affordable housing units in Los Angeles.
  - Alternative 1 would not increase the number of affordable housing units on the project site as no new development would occur.
- Replace existing affordable housing units on the OSP Specific Plan Site with code-compliant affordable and moderate housing units in a variety of sizes and configurations to allow for a mix of household sizes, enhanced security and accessibility, and long-term useful life of buildings to minimize the future need for substantial repairs or replacement of the affordable housing.
  - The existing housing on the OSP Specific Plan Site would be modernized to the extent required by applicable regulations over time; residential unit renovations would continue to occur over the long term as units become vacant and turn over. However, a mix of housing types would not be provided on the OSP Specific Plan Site and the enhanced security that would be achieved by the proposed project through crime prevention through design and on-site security personnel would not occur under Alternative 1. Additionally, this alternative would not fully meet the enhanced accessibility objective since it would not provide accessible units of a sufficient range of sizes and amenities to meet the requirements of Title 24 Section 8.26 as no new development would occur.

- Incorporate building designs that integrate into the surrounding neighborhoods, take advantage of waterfront views, provide a variety of building types, and integrate new amenities with a focus on developing a healthy and vibrant community.
  - This objective was not a priority when the existing buildings were originally designed and constructed, and since the existing buildings on the OSP Specific Plan Site would remain in place under Alternative 1 and their relationship to the project site and neighborhood would remain unchanged, this objective would not be met. In addition, none of the new amenities associated with the proposed project, such as publicly accessible open space, health care and wellness clinics, and youth and community centers, would be developed under Alternative 1 as no new development would occur. Therefore, this objective would not be met.
- Create a mixed-use, mixed-income community that includes a mix of dwelling unit types and sizes, affordability levels, local-serving retail, community services, and active and passive open/green space.
  - Alternative 1 would not modify the existing mix of uses, affordability levels, and unit types and sizes as no new development would occur. No local-serving retail, community services, and new open/green space would be developed under this alternative. Therefore, this objective would not be met.
- Implement green design practices to ensure environmental sustainability, including, but not limited to, energy and water efficiency.
  - Alternative 1 would maintain the existing site design and buildings, and would not include green design practices or energy and water efficiency upgrades as no new development would occur. Therefore, this objective would not be met.
- Create new recreation and park facilities that meet the needs and enhance safety of the future residents at the project site and the broader community.
  - No new recreation or park facilities would be developed under Alternative 1 as no new development would occur. Therefore, this objective would not be met.

6.5 Alternative 2: Historic Rehabilitation

6.5.1 Description

Under the Historic Rehabilitation Alternative (Alternative 2), the OSP Specific Plan would not be implemented, and the existing Rancho San Pedro buildings would not be demolished. The existing buildings on the OSP Specific Plan Site would be rehabilitated and would continue to be used for public housing by existing/future residents. The existing housing is generally substandard in quality and does not meet the HUD unit size standards. Existing physical deficiencies would require building upgrades in the long term, as described in the Physical Needs Assessment completed for the existing buildings in 2017 (EMG 2017). Alternative 2 would include the necessary extensive repairs to ensure the structures are up to current Building Code standards for historic properties, ensure seismic safety and integrity, remediate suspect ACM and LBP contaminants, modernize building HVAC systems and appliances to the extent feasible, upgrade and repair electrical systems, remediate ADA accessibility deficiencies, exterminate any present termites and remediate termite damage, and repair deficient sewer and water infrastructure serving the site. Rehabilitation would be completed in conformance with the Secretary's Standards and in accordance with the California Historic Building Code. Rehabilitation activities on the OSP Specific Plan Site would generally involve the use of small hand

and power tools typically used for housing renovation. Under this alternative, the 327 Harbor Site would be developed with the same land uses as the proposed project, which would consist of a four-story, 47-unit multi-family affordable housing development. Certain Project Design Features (PDFs) required by the OSP Specific Plan would not be included under Alternative 2, as they would be infeasible or would not be applicable, including the following:

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

6.5.2 Impact Analysis

a. Aesthetics

Scenic Vistas

Construction

Rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would generally involve the use of small hand and power tools typically used for housing renovation, instead of the large quantities of heavy-duty construction equipment that would be required at the OSP Specific Plan Site under the proposed project. Therefore, rehabilitation activities on the OSP Specific Plan Site under this alternative would result in no impact to scenic vistas. Similar to the proposed project, under Alternative 2, construction equipment used at the 327 Harbor Site may partially block views of surrounding development; however, construction would not affect scenic vistas due to the intervening distance, intervening existing development that already blocks views, and orientation of the project site relative to scenic vistas. Construction activities would not affect views from Harbor Boulevard east toward the Pacific Ocean, north toward Vincent Thomas Bridge, or south toward Ports O' Call Village because construction activities would occur west of Harbor Boulevard. Construction activities would be temporary and construction equipment would be removed upon completion. Alternative 2 would result in a less than significant impact to scenic vistas during construction for the proposed project at the 327 Harbor Site, similar to the proposed project. Due to the reduced construction activities, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Operation

Alternative 2 would not involve construction of new buildings on the OSP Specific Plan Site, and therefore, would not result in operational changes to views of scenic vistas at the OSP Specific Plan Site compared to existing conditions. Alternative 2 would develop the 327 Harbor Site consistent with the proposed project. As described in Section 4.1, *Aesthetics*, development of the 327 Harbor Site would not substantially affect views of scenic vistas and impacts would be less than significant. Therefore, Alternative 2 would result in a less than significant impact to scenic vistas during operation. Because Alternative 2 would not result in changes to views at the OSP Specific Plan Site, Alternative 2 would result in reduced impacts compared to the proposed project.

Scenic Highways

There are no State-designated Scenic Highways within or visible from the project site. Harbor Boulevard is a locally-designated scenic corridor; however, construction of Alternative 2 would not affect views of scenic resources to the east, north, and south of Harbor Boulevard as construction would occur west of Harbor Boulevard. Similar to the proposed project, construction would not result in impacts to scenic resources within a scenic roadway. Alternative 2 also would not result in development that would cause operational impacts scenic resources along Harbor Boulevard identified by the San Pedro Community Plan. Alternative 2 would not result in development that would not interfere with or otherwise adversely affect a State-designated Scenic Highway or scenic resources along Harbor Boulevard identified by the San Pedro Community Plan. Overall, Alternative 2 would result in no impact to scenic resources, including trees, rock outcroppings, and historic resources, in a State-designated Scenic Highway, and impacts would be similar to the proposed project.

Visual Character and Quality

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would generally involve the use of small hand and power tools typically used for housing renovation, instead of the large quantities of heavy-duty construction equipment that would be required at the OSP Specific Plan Site under the proposed project. Therefore, rehabilitation activities on the OSP Specific Plan Site under this alternative would result in no impact to visual character and quality. Under Alternative 2, construction equipment at the 327 Harbor Site would temporarily affect scenic quality in the project site vicinity; however, Mitigation Measure AES-1 would be implemented during construction of Alternative 2 to shield construction activity at the 327 Harbor Site from outside views. Additionally, construction contractors under both Alternative 2 and the proposed project would be required to comply with applicable City regulations related to construction activities, including trash removal and equipment storage, which would reduce the potential for construction impacts to visual character and quality. As such, Alternative 2 would result in a less than significant impact to visual character and quality with implementation of mitigation, and impacts would be similar to the proposed project.

Operation

Alternative 2 would not result in new buildings at the OSP Specific Plan Site, but rather the rehabilitation of the existing on-site residential buildings, including repairing damaged façades, which would enhance the visual character and quality of existing conditions on the OSP Specific Plan Site. The visual quality of the OSP Specific Plan Site under Alternative 2 would be similar to existing conditions. Alternative 2 would develop the 327 Harbor Site consistent with the proposed project. As described in Section 4.1, *Aesthetics*, development of the 327 Harbor Site would not substantially affect visual character or quality and impacts would be less than significant. Because Alternative 2 would maintain the existing development on the OSP Specific Plan Site, impacts to visual character and quality would be reduced under Alternative 2 in comparison to the proposed project.

Light and Glare

Construction

Construction of Alternative 2 would adhere to the same LAMC standards limiting construction hours as the proposed project. Similar to the proposed project, construction of Alternative 2 may require limited evening lighting from 4:30 p.m. to 6:30 p.m. during the winter months. However, Mitigation Measure AES-2 would be implemented, which would require outdoor construction lighting to be shielded from adjacent residential properties and the public rights-of-way. As such, construction of Alternative 2 would result in a less than significant impact related to light and glare with implementation of mitigation, similar to the proposed project. However, due to the reduced construction period, Alternative 2 would result in reduced impacts related to light and glare than the proposed project.

Operation

Operation of Alternative 2 would result in similar levels of lighting and glare on the OSP Specific Plan Site as under existing conditions because increased development density would not occur. Alternative 2 would implement PDF AES-1 and PDF AES-2, which are designed to reduce the effects of light spillage, glare from reflective surfaces, and other light and glare sources. As such, operation of Alternative 2 would result in a less than significant impact related to light and glare with mitigation. Because Alternative 2 would result in the introduction of fewer sources of light and glare than the proposed project, Alternative 2 would result in reduced impacts compared to the proposed project.

No changes to the amount of shading at nearby shadow sensitive land uses would occur at the OSP Specific Plan Site, as building heights would remain consistent with current conditions. Alternative 2 would develop the 327 Harbor Site consistent with the proposed project. As described in Section 4.1, *Aesthetics*, development of the 327 Harbor Site would not significantly shade nearby shadow sensitive land uses. Therefore, impacts related to shade and shadow would be less than significant, similar to the proposed project. Due to the reduced building heights at the OSP Specific Plan Site, shading impacts under Alternative 2 would be reduced in comparison to the proposed project.

b. Air Quality

Criteria Pollutant Emissions

Construction

REGIONAL EMISSIONS

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would generally involve the use of small hand and power tools typically used for housing renovation, instead of the large quantities of heavy-duty construction equipment that would be required at the OSP Specific Plan Site under the proposed project. Nonetheless, as with the proposed project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment at the 327 Harbor Site and vehicle trips generated from construction workers traveling to and from the project site. Alternative 2 would reduce construction activities compared to the proposed project due to the reduction in residential development of 1,075 units and elimination of proposed Neighborhood Serving Uses and commercial retail uses. Due to the reduced construction activities, Alternative 2 would result in lower daily maximum air pollutant emissions than the

proposed project, which was determined to result in less than significant impacts to regional air quality during construction with implementation of Mitigation Measure AQ-1. Similar to the proposed project, Alternative 2 would implement Mitigation Measure AQ-1, and impacts associated with regionalized construction emissions would be less than significant with mitigation and reduced in comparison to the proposed project.

LOCALIZED EMISSIONS

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would generally involve the use of small hand and power tools typically used for housing renovation, instead of the large quantities of heavy-duty construction equipment that would be required under the proposed project. Nonetheless, under Alternative 2, construction activities would be located at a similar distance to sensitive receptors as under the proposed project. However, given the reduction in the proposed development, overall construction activities and associated localized emissions from construction of Alternative 2 would be reduced compared to those of the proposed project, which was determined to result in less than significant impacts related to localized emissions during construction with implementation of Mitigation Measure AQ-1. Alternative 2 would also implement Mitigation Measure AQ-1, and impacts associated with localized construction emissions would be less than significant with mitigation and reduced in comparison to the proposed project.

Operation

REGIONAL EMISSIONS

Alternative 2 would not construct new buildings or introduce new non-residential uses on the OSP Specific Plan Site. The alternative would emit less pollutants associated with vehicle use and natural gas and electricity demand in comparison to the proposed project. Due to the reduced development intensity, operational emissions would not exceed the regional threshold for volatile organic compounds and implementation of Mitigation Measure AQ-2 would not be required. Impacts associated with regional air pollutant emissions during operation of Alternative 2 would be less than significant, in contrast to the proposed project's less than significant impacts with mitigation. Impacts related to operational regional emissions would be reduced under Alternative 2 in comparison to the proposed project.

LOCALIZED EMISSIONS

Localized operational emissions impacts are determined primarily by traffic volumes. Alternative 2 would reduce the total number of residences on the project site by 1,075 units, compared to the proposed project, and would not construct the Neighborhood Serving Uses or commercial retail uses included in the proposed project. The reduced development under Alternative 2 would result in less associated vehicle trips than the proposed project, and therefore, Alternative 2 would result in less localized operational emissions from mobile sources. Similarly, operational area and stationary sources of emissions would be reduced compared to the proposed project because fewer residential units would be located on site under Alternative 2. The proposed project was determined to result in less than significant operational impacts related to localized emissions. As such, under Alternative 2, localized air pollutant emissions during operation would be less than significant, and reduced compared to the proposed project.

Toxic Air Contaminants

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would generally involve the use of small hand and power tools typically used for housing renovation, instead of the large quantities of heavy-duty construction equipment that would be required under the proposed project. Nonetheless, as with the proposed project, construction of Alternative 2 would generate toxic air contaminants associated with heavy equipment use on the 327 Harbor Site. Similar to the proposed project, Alternative 2 would implement Mitigation Measure AQ-1, which requires the use of Tier 4 and electric construction equipment to reduce pollutant emissions. the overall amount of toxic air contaminant emissions associated with Alternative 2 would be less than the proposed project because Alternative 2 would not require the use of heavy-duty construction equipment for demolition or grading activities at the OSP Specific Plan Site. The proposed project was determined to result in less than significant impacts associated with toxic air contaminants during construction with implementation of Mitigation Measure AQ-1. As such, under Alternative 2, construction impacts related to toxic air contaminants would be less than significant with mitigation and reduced compared to the proposed project.

Operation

Similar to the proposed project, Alternative 2 would not include land uses that result in the exposure of sensitive receptors to toxic air contaminants. Alternative 2 would not place sensitive receptors within 500 feet of a high-volume roadway. Alternative 2 would rehabilitate existing buildings in accordance with Title 24 standards, including installation of Minimum Efficiency Reporting Value (MERV) 13 filtration systems to reduce particulate matter emissions by at least 70 percent. Additionally, Alternative 2 would decrease the number of truck deliveries, vehicle trips, and associated diesel fuel emissions compared to the proposed project because Alternative 2 would include fewer residential units and would not construct Neighborhood Serving Uses or commercial/retail uses, which receive routine inventory deliveries. Operation of the proposed project was determined to result in less than significant operational impacts related to toxic air contaminants. As such, under Alternative 2, operational impacts related to toxic air contaminant emissions would be less than significant, and reduced compared to the proposed project.

c. Cultural Resources

Historical Resources

Alternative 2 would not involve the demolition of the Rancho San Pedro Complex, which is considered a historical resource pursuant to CEQA, but rather would rehabilitate the existing buildings in conformance with the Secretary's Standards and in accordance with the California Historic Building Code. Compliance with these standards would ensure the existing buildings are rehabilitated in a manner that preserves their historic character-defining qualities, and Mitigation Measures CUL-1 and CUL-2 would not be required. Additionally, consistent with the proposed project, development of the 327 Harbor Site would result in a less than significant impact to historical resources as none are present at that location. Therefore, Alternative 2 would result in a less than significant impact to historical resources, whereas the proposed project would result in significant and unavoidable impacts to historical resources even with mitigation implemented. Therefore, the impacts under Alternative 2 would be reduced compared to the proposed project.

Archaeological Resources

Alternative 2 would not involve grading or excavation activities at the OSP Specific Plan Site; therefore, the potential for Alternative 2 to uncover buried archaeological resources would be reduced compared to the proposed project. However, Alternative 2 would involve grading and excavation activities on the 327 Harbor Site and, similar to the proposed project, Alternative 2 would implement Mitigation Measures CUL-3 through CUL-6 at the 327 Harbor Site, which would require implementation of standard procedures during construction in the event an archaeological resource is discovered. As such, under Alternative 2, impacts to archaeological resources would be less than significant with mitigation incorporated. Due to the reduced potential to encounter buried archaeological resources on the OSP Specific Plan Site, Alternative 2 would result in reduced impacts compared to the proposed project.

Human Remains

Alternative 2 would not involve grading or excavation activities at the OSP Specific Plan Site; therefore, the potential for Alternative 2 to uncover human remains at the OSP Specific Plan Site would be reduced compared to the proposed project. However, Alternative 2 would involve grading and excavation activities on the 327 Harbor Site and, similar to the proposed project, Alternative 2 would implement Mitigation Measure CUL-7 at the 327 Harbor Site and impacts to human remains would be less than significant with mitigation. Due to the reduced potential to encounter human remains on the OSP Specific Plan Site, impacts would be reduced under Alternative 2 in comparison to the proposed project.

d. Geology and Soils

Geologic and Soil Hazards

Under Alternative 2, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to the proposed project's impacts because these impacts are a function of the project site's underlying geologic conditions rather than the type or amount of land use proposed. Alternative 2 would be designed and constructed to conform to the current seismic design provisions of the California Building Code, California Historic Building Code, and Los Angeles Building Code, as applicable. Alternative 2 would also implement Mitigation Measures GEO-1 and GEO-2 at the 327 Harbor Site, which require submittal of a final design-level geotechnical report to identify and minimize seismic risks and retention of a certified geotechnical professional to test foundations during construction. These mitigation measures would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 2, as rehabilitation of the existing buildings would generally involve the use of small hand and power tools typically used for housing renovation, instead of the large quantities of heavy-duty construction equipment that would be required at the OSP Specific Plan Site under the proposed project. Therefore, as with the proposed project, Alternative 2 would not cause or accelerate geological conditions that could result in substantial damage to infrastructure or expose people to substantial risk of injury. As such, similar to the proposed project, Alternative 2 would result in less than significant impacts related to geology and soils with implementation of mitigation. Alternative 2 would have fewer residential units than the proposed project, and fewer people would reside on the project site under Alternative 2 than the proposed project. Therefore, Alternative 2 would expose fewer people to geologic and soil hazards and would result in reduced impacts compared to the proposed project.

Paleontological Resources

Alternative 2 would not involve construction of subterranean parking structures or grading at the OSP Specific Plan Site; therefore, the potential for Alternative 2 to uncover subsurface paleontological resources at the OSP Specific Plan Site would be reduced in comparison to the proposed project. Similar to the proposed project, Alternative 2 would implement Mitigation Measure GEO-3 at the 327 Harbor Site to reduce the potential for impacts to paleontological resources at the 327 Harbor Site during ground-disturbing activities. This mitigation measure would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 2, as rehabilitation of the existing buildings would not involve ground-disturbing activities. As such, under Alternative 2, potential impacts to paleontological resources would be less than significant with mitigation incorporated. Due to the reduced potential to encounter paleontological resources on the OSP Specific Plan Site, impacts would be reduced under Alternative 2 in comparison to the proposed project.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. Alternative 2 would result in a reduction in VMT compared to the proposed project because this alternative would result in fewer residential units and no non-residential uses. Alternative 2 would include energy efficiency upgrades to appliances and lighting where feasible and in compliance with the Secretary's Standards and would not conflict with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Therefore, Alternative 2 would result in less than significant impacts related to GHG emissions. Because Alternative 2 would include fewer dwelling units and no non-residential uses, GHG emissions would be reduced and Alternative 2's impacts related to GHG emissions would be reduced compared to the proposed project.

f. Hazards and Hazardous Materials

Construction

Under Alternative 2, existing residential buildings on the OSP Specific Plan Site would be rehabilitated, including removal of hazardous buildings materials such as LBP and ACM. Alternative 2 would not involve construction of subterranean parking structures or grading at the OSP Specific Plan Site; therefore, disturbance of contaminated soils during construction of Alternative 2 would be reduced compared to the proposed project. Construction of Alternative 2 would temporarily increase the transport, use, storage, and disposal of construction-related hazardous materials and petroleum products, similar to the proposed project. However, such uses would be reduced compared to the proposed project because of the reduced construction activities under Alternative 2. Construction of this alternative would comply with the same applicable federal and State regulations for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste as the proposed project. Alternative 2 would also implement Mitigation Measures HAZ-1 through HAZ-5, which would ensure proper and safe procedures for handling, transport, and disposal of contaminated soils, as well as implementation of a construction vapor monitoring plan and vapor mitigation system, at the 327 Harbor Site. With implementation of mitigation, construction impacts related to hazardous materials would be less than significant under Alternative 2. Due to the reduced ground disturbance associated with Alternative 2, construction impacts related to hazardous materials would be reduced in comparison to the proposed project.

Similar to the proposed project, construction of the 327 Harbor Site under Alternative 2 may temporarily increase traffic on Harbor Boulevard and Pacific Avenue, nearby designated evacuation routes. However, lane closures would be temporary and no full roadway closures would be required. Potential temporary traffic and access disruption that may occur during construction of the 327 Harbor Site would be addressed by implementation of PDF T-1, which would include a traffic control plan. Rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would require substantially fewer construction workers and less construction materials to be delivered to the OSP Specific Plan Site than the construction activities that would occur on the OSP Specific Plan Site by the proposed project. Because Alternative 2 would reduce the amount of construction compared to the proposed project, the duration of time that construction may temporarily increase traffic on Harbor Boulevard and Pacific Avenue would be less than the proposed project. Therefore, construction impacts to emergency evacuation would be less than significant, and would be reduced under Alternative 2 compared to the proposed project.

Operation

Similar to the proposed project, operation of Alternative 2 would involve the use of hazardous materials commonly used in residential developments, such as cleaning agents, paints, pesticides, and materials used for landscaping, which do not typically involve the use or storage of large quantities of hazardous materials. However, due to the reduced number of dwelling units under Alternative 2, less household hazardous materials would be used compared to the proposed project. The use of hazardous materials during operation of Alternative 2 would occur in accordance with applicable federal, State, and local requirements. As such, under Alternative 2, potential operational impacts related to hazards and hazardous materials use would be less than significant. Due to the reduced density and associated use of hazardous materials, impacts under Alternative 2 would be reduced in comparison to the proposed project.

Similar to the proposed project, operation of Alternative 2 would not involve activities that would interfere with an adopted emergency response or evacuation plan. Under Alternative 2, driveways would be designed to meet applicable local standards regarding site access, which would be confirmed during the Los Angeles Fire Department (LAFD) fire/life safety plan review and inspection. Furthermore, operation of Alternative 2 would involve fewer vehicle trips, as compared to the proposed project, which would result in reduced potential to impede emergency vehicles and evacuation. As such, under Alternative 2, potential operational impacts related to interference with emergency evacuation and response would be less than significant, and impacts would be reduced in comparison to the proposed project.

g. Hydrology and Water Quality

Surface Water

Construction

Rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would not result in ground disturbance. Therefore, Alternative 2 would result in less ground-disturbing activities than the proposed project, which would reduce the potential for soil erosion in comparison to the proposed project. Similar to the proposed project, construction of Alternative 2 would occur in compliance with the State Water Resource Control Board's National Pollutant Discharge Elimination System (NPDES) Construction General Permit and the City's grading permit regulations, which require a project-specific Storm Water Pollution Prevention Plan (SWPPP) and erosion control plan to be implemented

to control runoff and minimize the effects of erosion during construction. Because Alternative 2 would not involve construction of subterranean parking structures or grading at the OSP Specific Plan Site, as would occur under the proposed project, no dewatering activities would occur under this alternative that could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. With compliance with NPDES and City regulations, construction of Alternative 2 would not result in discharge that would violate any water quality standard or waste discharge requirements, or substantially alter the amount of surface water flow. As such, under Alternative 2, construction-related impacts to surface water would be less than significant. Due to the reduced ground-disturbing activities, Alternative 2 would result in reduced construction-related impacts to surface water compared to the proposed project.

Operation

Similar to the proposed project, Alternative 2 would implement best management practices (BMPs) for managing post-construction stormwater runoff in compliance with the City's Low Impact Development (LID) ordinance requirements. Implementation of the BMPs on the project site would control stormwater and prevent discharges from violating surface water quality standards or waste discharge requirements. Similar to the proposed project, Alternative 2 would implement an approved Stormwater Management Program and Water Quality Management Program to ensure stormwater is appropriately retained on site, stormwater runoff flows are not increased above existing conditions, and stormwater discharged into the City's stormwater drainage system meets or exceeds the required water quality standards. As such, impacts to surface water during operation of Alternative 2 would be less than significant. These impacts would be similar to those under the proposed project.

Groundwater

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would not result in ground disturbance. During construction of Alternative 2, hazardous materials such as fuels, paints, solvents, and concrete additives would be used and could increase the opportunity for hazardous materials to be released into groundwater. However, Alternative 2 construction activities would be carried out in accordance with NPDES and City regulations to reduce impacts to groundwater quality, similar to the proposed project. Alternative 2 would not require temporary dewatering activities, and therefore, would not remove groundwater during construction. The removal of contaminated soils on the 327 Harbor Site would occur with oversight by the appropriate regulatory agency, which would require all proposed construction activities to follow the procedures necessary to prevent soil removal and remediation activities from affecting groundwater quality. Similar to the proposed project, imported fill materials used for Alternative 2 would be nonhazardous. Compliance with regulatory requirements would reduce the potential for construction activities under Alternative 2 to release contaminants into groundwater or cause a violation of water quality standards. As such, under Alternative 2, impacts to groundwater would be less than significant. Because construction of Alternative 2 would require less disturbance of soils on the OSP Specific Plan Site, construction-related impacts to groundwater under Alternative 2 would be reduced in comparison to the proposed project.

Operation

Similar to the proposed project, Alternative 2 would not include installation or operation of water wells, an extraction or recharge system, a municipal supply well, or a spreading ground facility. Similar

to the proposed project, Alternative 2 would not require long-term dewatering activities. No underground storage tanks would be placed beneath the project site, and hazardous materials associated with operation of Alternative 2 would be limited to common household hazardous materials.

Alternative 2 would result in reduced impervious surfaces at the project site compared to the proposed project. Stormwater infiltration on the OSP Specific Plan Site under Alternative 2 would remain generally the same as under existing conditions, as there would be no change in the layout and amount of impervious surface. Therefore, operational impacts to groundwater quality under Alternative 2 would be less than significant, and would be reduced in comparison to the proposed project.

h. Land Use and Planning

Division of an Established Community

Rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would require substantially fewer construction workers and less construction materials to be delivered to the OSP Specific Plan Site than the construction activities that would occur on the OSP Specific Plan Site by the proposed project. Nonetheless, during construction of Alternative 2, temporary lane closures and fencing of the 327 Harbor Site for safety and screening purposes, would be required. Similar to the proposed project, Alternative 2 would implement PDF T-1, which would ensure there is adequate signage and safe alternative access for existing Rancho San Pedro residents and the surrounding community during construction. Construction of Alternative 2 would not physically divide an established community. Likewise, the existing layout and characteristics of the OSP Specific Plan Site would be maintained under Alternative 2, and no operational impact related to the division of an established community would occur. Alternative 2 would result in less than significant impacts, similar to the proposed project.

Consistency with Land Use Plans and Policies

Alternative 2 would not change the density, height, or massing of existing buildings on the OSP Specific Plan Site and would not implement the OSP Specific Plan. Rehabilitation of existing buildings on the OSP Specific Plan Site would not conflict with the existing Low Medium II Residential (RD1.5-1XL-CPIO) and Community Commercial (C2-2D-CPIO) land use and zoning designations on the OSP Specific Plan Site. Development proposed on the 327 Harbor Site would also conform to the permitted land uses and zoning requirements, as it would under the proposed project. As Alternative 2 would construct a project consistent with the existing general plan designations and zoning of the project site, Alternative 2 would not conflict with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth by the City's General Plan, the San Pedro Community Plan, the Pacific Corridors Redevelopment Plan, and SCAG's 2020-2045 RTP/SCS. As such, under Alternative 2, impacts related to land use and planning would be less than significant. These impacts would be similar to those under the proposed project.

i. Noise

Noise

Construction

Construction of Alternative 2 would generate noise from rehabilitation activities on the OSP Specific Plan Site, use of heavy-duty construction equipment on the 327 Harbor Site, and haul truck and construction worker trips. As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would require substantially fewer construction workers and less construction materials to be delivered to the OSP Specific Plan Site than the construction activities that would occur on the OSP Specific Plan Site by the proposed project. Therefore, construction noise levels on the OSP Specific Plan Site under Alternative 2 would be reduced compared to the proposed project, due to the reduced construction intensity associated with rehabilitation as compared to demolition and redevelopment of the site. Because the same development would occur on the 327 Harbor Site as under the proposed project, construction noise levels at the 327 Harbor Site would be the same as those described in Section 4.9, *Noise*. Similar to the proposed project, construction noise levels from the 327 Harbor Site under Alternative 3 would be reduced through implementation of Mitigation Measure NOI-1, which would require noise barriers and other measures to reduce construction noise. However, as with the proposed project, construction on the 327 Harbor Site under Alternative 2 would result in significant and unavoidable noise impacts. As such, under Alternative 2, construction noise impacts would be significant and unavoidable. Due to the reduced construction activities on the OSP Specific Plan Site under Alternative 2, construction noise impacts would be reduced compared to the proposed project.

Operation

Under Alternative 2, sources of operational noise would include on-site stationary sources and traffic. The proposed project's operational traffic increase would not exceed City noise thresholds; therefore, the reduced traffic increase associated with Alternative 2 would similarly not exceed City noise thresholds. Alternative 2 would not introduce additional noise from recreational spaces because Alternative 2 would not include a linear park, community center, or youth sports field. It is anticipated that with the reduced number of dwelling units and recreational space included under Alternative 2, noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be less than significant. Alternative 2 would not require implementation of Mitigation Measure NOI-2 because Alternative 2 would not include amplified sound equipment associated with development of a youth sports field or other potential recreational uses such as a skate park, bandshell, and/or dog park. As with the proposed project, Alternative 2 would comply with the requirements of LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 A-weighted decibels (dBA). As such, under Alternative 2, operational on-site noise impacts would be less than significant in contrast to the proposed project's significant and unavoidable operational noise impacts. Alternative 2 would result in reduced operational noise impacts compared to the proposed project.

Vibration

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would generally involve the use of small hand and power tools typically used for housing renovation, instead of the large quantities of heavy-duty construction equipment that would be required at the OSP Specific Plan Site under the proposed project. Therefore, rehabilitation activities on the OSP Specific Plan Site under this alternative would result in no impact associated with vibration during construction. Similar to the proposed project, Alternative 2 would not require pile driving, and the greatest anticipated source of vibration during construction activities would be from a vibratory roller and other earth moving equipment, such as a dozer, used on the 327 Harbor Site. Similar to the proposed project, roadway and utility work could occasionally occur within 25 feet of structures, and it is assumed large dozers and vibratory rollers may be used within 25 feet of the nearest receptors, which could result in peak vibration levels similar to the proposed project and in exceedance of appliable thresholds related to architectural impacts and human annoyance from construction-related vibration. Alternative 2 would implement Mitigation Measure NOI-3 for activities at the 327 Harbor Site, which would reduce vibration levels below the threshold of significance for architectural damage. However, as with the proposed project, vibration levels could still exceed the human annoyance threshold of 72 decibel notation (VdB) and impacts related to human annoyance from construction-related vibration would be significant and unavoidable. Mitigation Measure NOI-3 would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 2, as rehabilitation of the existing buildings would not involve ground-disturbing activities or the use of heavy-duty construction equipment. Because the construction period under Alternative 2 would be shorter than the proposed project, Alternative 2 would result in reduced impacts related to construction vibration in comparison to the proposed project.

Operation

Similar to the proposed project, operation of Alternative 2 would not include land uses that generate substantial groundborne vibration, such as subways or rail lines. Therefore, operation of Alternative 2 would result in a less than significant impact related to groundborne vibration and impacts would be similar to the proposed project.

j. Population and Housing

Construction

During construction of Alternative 2, no direct impact to population growth would occur; however, construction activities would create short-term employment opportunities in the construction field, which could indirectly increase the population and demand for housing in the vicinity of the project site. Nonetheless, the employment patterns of construction workers in southern California are such that it is not likely that they would relocate their households. Therefore, construction activity associated with Alternative 2 would not indirectly cause population growth or accelerate the demand for housing. As such, impacts to population and housing during construction of Alternative 2 would be less than significant, and reduced compared to the proposed project due to the reduced amount of construction that would occur.

During rehabilitation of the existing buildings on the OSP Specific Plan Site, resident relocation would be required. Rehabilitation of the existing buildings would occur in phases to minimize resident

relocation to the extent feasible. Relocated residents would be offered a choice of housing including a rehabilitated on-site unit, a tenant-based housing choice voucher, or a public housing unit at another HACLA community. Similar to the proposed project, the 47 residential units on the 327 Harbor Site would provide replacement housing for some of the current residents on the OSP Specific Plan Site, if residents elect to relocate to the 327 Harbor Site. However, as there would be no change in the number of housing units available on the OSP Specific Plan Site, a greater number of households would be required to relocate offsite during rehabilitation as compared to the proposed project. Although residents would be required to move out of their existing units during the course of construction, all current residents in good standing would have the option to move into a new unit at either the 327 Harbor Site or back to their rehabilitated unit on the OSP Specific Plan Site, and no permanent offsite relocation would be required unless a resident selects that as their preferred option. Therefore, the proposed project would not displace substantial numbers of existing housing or persons, requiring construction of housing offsite, and impacts would be less than significant. Nonetheless, due to the greater number of households requiring offsite relocation during construction, Alternative 2 would result in increased impacts compared to the proposed project.

Operation

Based on the San Pedro's average of 2.42 persons per households, Alternative 2 would result in a population growth of approximately 114 persons due to development of the 327 Harbor Site (City of Los Angeles 2021b). This increase would represent approximately 0.01 percent of the anticipated population growth in the city, based on SCAG's 2045 population forecast (SCAG 2020). Unlike the proposed project, Alternative 2 would not result in new employment opportunities because Alternative 2 would not include Neighborhood Serving Uses or commercial retail uses on the project site. The project site is an infill site in an urban area served by existing roadways and infrastructure. Similar to the proposed project, Alternative 2 would not result in new roads or the extension of utilities into previously undeveloped areas and therefore would not result in indirect population growth. As such, Alternative 2 would not result in substantial unplanned direct or indirect population growth, and impacts would be similar to the proposed project.

k. Public Services

Fire Protection

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would require substantially fewer construction workers and less construction materials to be delivered to the OSP Specific Plan Site than the construction activities that would occur on the OSP Specific Plan Site by the proposed project. Therefore, the amount of development and construction activities associated with Alternative 2 would be reduced on the OSP Specific Plan Site compared to the proposed project. As with the proposed project, construction of Alternative 2 would comply with all State and local regulations concerning fire prevention. In addition, Alternative 2 would include PDF T-1 for construction activities at the 327 Harbor Site, which would reduce the potential for traffic-related conflicts. PDF T-1 would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 2, due to the substantial reduction in the number of construction workers and construction-related deliveries necessary for construction on the OSP Specific Plan Site. Furthermore, pursuant to the California Vehicle Code Section 21806, the drivers of emergency vehicles can avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such,

construction of Alternative 2 would not result in the need for new or altered fire station facilities, and impacts associated with fire protection would be less than significant. Due to the reduced construction activities and shorter construction timeline, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Operation

Alternative 2 would not construct new residential units on the OSP Specific Plan Site and would not include Neighborhood Serving Uses or commercial retail uses. Therefore, additional demand for services from LAFD would be limited to the 114 new residents added to the 327 Harbor Site and would be reduced compared to the proposed project. Similar to the proposed project, Alternative 2 would implement all applicable City Building and Fire Code regulations regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, and life safety features. Alternative 2 would undergo LAFD review to ensure compliance with applicable City regulations. This review process would ensure Alternative 2 would minimize the demand for fire protection and emergency medical services. Furthermore, as with the proposed project, traffic generated by Alternative 2 would not significantly impact emergency vehicle response as emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As with the proposed project, the Los Angeles Department of Water and Power (LADWP) would be able to supply sufficient fire flow and pressure needed for fire suppression for Alternative 2. As such, Alternative 2 would not necessitate the construction of new or altered fire station facilities, and impacts associated with fire protection would be less than significant. Due to the reduction in population growth and total floor area, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Police Protection

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would require substantially fewer construction workers and less construction materials to be delivered to the OSP Specific Plan Site than the construction activities that would occur on the OSP Specific Plan Site by the proposed project. Therefore, Alternative 2 would result in reduced construction activities and duration of construction in comparison to the proposed project. Construction activities would not generate a permanent population on the project site that would necessitate a substantial increase in police services in San Pedro. Construction sites can invite theft and vandalism and thereby become sources of nuisance and hazard. As with the proposed project, Alternative 2 would incorporate PDF POL-1 to implement temporary security measures during construction and provide regular security patrols during non-construction hours at the 327 Harbor Site, which would serve to reduce demand on Los Angeles Police Department (LAPD) services. PDF POL-1 would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 2, due to the substantial reduction in construction-related activities on the OSP Specific Plan Site.

Alternative 2 would implement PDF T-1 at the 327 Harbor Site to ensure continued provision of emergency access during construction. PDF T-1 would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 2, due to the substantial reduction in the number of construction workers and construction-related deliveries necessary for construction on the OSP Specific Plan Site. Furthermore, pursuant to the California Vehicle Code Section 21806, the drivers of emergency vehicles can avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, construction of Alternative 2 would not result in the need for new or

altered police station facilities, and impacts associated with police protection would be less than significant. Due to the reduced construction activities, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Operation

Alternative 2 would not construct new residential units on the OSP Specific Plan Site and would not include Neighborhood Serving Uses or commercial retail uses. Therefore, additional demand for services from LAPD would be limited to the 114 new residents added to the 327 Harbor Site and reduced compared to the proposed project. Similar to the proposed project, Alternative 2 would incorporate safety and crime prevention measures into the project's design, such as adequate lighting throughout the project site, and controlled access at the 327 Harbor Site. These features would assist to offset the minor increase in demand for police protection services generated by Alternative 2. As such, Alternative 2 would not necessitate the construction of new or altered police station facilities, and impacts associated with police protection would be less than significant. Due to the reduction in population growth and employees on the project site, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Schools

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would require substantially fewer construction workers at the OSP Specific Plan Site than the construction activities that would occur under the proposed project. Similar to the proposed project, Alternative 2 would create temporary jobs associated with construction. However, due to the employment patterns of construction workers in southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households. As such, construction of Alternative 2 would not result in the need for new or altered school facilities, and impacts associated with schools would be less than significant. Due to the reduced construction period and construction activities, Alternative 2 would result in reduced impacts compared to the proposed project.

Operation

Alternative 2 would result in a net increase of 47 residential units, which is approximately four percent of the net increase in residential units that the proposed project would generate. As shown in Table 6-3, Alternative 2 would result in approximately 17 new students (96 percent fewer than the proposed project). Similar to the proposed project, the project Applicant would be required to pay development fees to Los Angeles Unified School District (LAUSD) prior to the issuance of a building permit for the 327 Harbor Site. As discussed in Section 4.11, *Public Services*, LAUSD collects development fees for new construction within its district boundaries. Pursuant to Government Code Section 65995(h), the payment of these fees fully reduces all project-related school impacts. Payment of the applicable development school fees to LAUSD would offset the potential impact of additional student enrollment at the schools serving the project site. As such, Alternative 2 would not necessitate the construction of new or altered school facilities, and impacts associated with schools would be less than significant. Due to the reduced student generation, Alternative 2 would result in reduced impacts on schools than the proposed project.

Table 6-3 Estimated Net Number of Students Generated by Alternative 2

Land use	Unit	Student Generation Factor	Students Generated[1] Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Residential	47 du	0.3711 students/du[1]	9	3	5	17
Total Alternative 2 Student Generation			**9**	**3**	**5**	**17**
Proposed Project Student Generation			**249**	**68**	**136**	**453**
Percentage Reduction			**96.4%**	**95.6%**	**96.3%**	**96.2%**

du = dwelling unit

[1] The generation rates of 0.1953 (elementary school), 0.0538 (middle school), and 0.1071 (high school) were applied for residential uses.

Libraries

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would require substantially fewer construction workers at the OSP Specific Plan Site than the construction activities that would occur under the proposed project. Similar to the proposed project, due to the employment patterns of construction workers in southern California and the market for construction labor, construction workers are not likely to relocate their households. Construction workers would not contribute to a notable increase in an overall corresponding demand for library services in the vicinity of the project site because it is reasonable to assume that construction workers would visit libraries near their homes. Any increase in usage of libraries by construction workers under Alternative 2 would be negligible. As such, construction of Alternative 2 would not result in the need for new or altered library facilities, and impacts associated with libraries would be less than significant. Due to the reduced construction period and construction activities, Alternative 2 would result in reduced impacts compared to the proposed project.

Operation

Alternative 2 would result in a population increase of approximately 114 persons, which could increase the service population of the San Pedro Regional Branch Library by approximately 0.14 percent. This increase would be less than the demand of the proposed project, which was identified to be negligible. Furthermore, Alternative 2 would generate revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing for the library serving the project site and vicinity, as deemed appropriate by the City. Under Alternative 2, revenue for the General Fund would help offset the project-related increase in demand for library services. As such, Alternative 2 would not necessitate the construction of new or altered library facilities, and impacts associated with libraries would be less than significant. Due to the reduction in population growth, Alternative 2 would result in reduced impacts in comparison to the proposed project.

I. Recreation

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would require substantially fewer construction workers at the OSP Specific Plan Site than the construction

activities that would occur under the proposed project. Similar to the proposed project, due to the employment patterns of construction workers in southern California and the market for construction labor, construction workers are not likely to relocate their households. Given the temporary nature of construction activities and employment patterns of construction workers in the region, construction of the proposed project would not be anticipated to introduce a permanent new population to the project area that could result in an increase in the use of existing parks and recreational facilities. As such, construction of Alternative 2 would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities, and impacts associated with recreation would be less than significant. Due to the reduced construction period, Alternative 2 would result in reduced compared to the proposed project.

Operation

Alternative 2 would generate 114 new residents. This represents approximately four percent of the population increase that would occur under the proposed project, which was determined to result in a less than significant impact to recreation. As a result, the overall increased use of parks and recreational facilities would be reduced compared to the proposed project. Recreational amenities on the OSP Specific Plan Site would remain as-is under existing conditions. Similar to the proposed project, Alternative 2 would develop open space at the 327 Harbor Site consistent with the requirements of the Los Angeles Municipal Code (LAMC). As such, Alternative 2 would not necessitate the construction of new or altered parks or recreational facilities beyond those proposed for the 327 Harbor Site, and impacts associated with recreation would be less than significant. Due to the reduction in population growth, Alternative 2 would result in reduced impacts in comparison to the proposed project.

m. Transportation

Conflict with Plans, Policies, and Programs

The plans, policies, and programs applicable to the proposed project, such as Mobility Plan 2035 and the San Pedro Community Plan, would also apply to Alternative 2. This alternative would provide electric vehicle charging stations and bicycle parking at the 327 Harbor Site to encourage sustainable and active transportation; however, Alternative 2 would not include the proposed project's transportation improvements such as a mobility hub and new bicycle lanes within and surrounding the OSP Specific Plan Site. Therefore, although Alternative 2 would not specifically conflict with circulation system plans, it would be less compatible with these plans compared to the proposed project. Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. Nonetheless, Alternative 2 would result in increased impacts in comparison to the proposed project.

Vehicle Miles Traveled

Alternative 2 would result in a lower daily VMT in comparison to the proposed project because Alternative 2 would result in less population growth and employment than the proposed project, which would reduce associated vehicle trips. Alternative 2 would rehabilitate existing buildings on the OSP Specific Plan Site and the only net increase in development would be the 47 residential units on the 327 Harbor Site. Based on the City of Los Angeles VMT Calculator Version 1.3, the net increase in daily trips associated with Alternative 2 would be 203 trips (City of Los Angeles 2020). This is below the Tier 2 screening criteria of 250 daily trips and Alternative 2 would result in a less than significant

VMT impact. Due to the fewer number of daily trips and associated VMT, impacts under Alternative 2 would be reduced compared to the proposed project.

Design Hazards

Under Alternative 2, the existing roadways and driveways serving the OSP Specific Plan Site would be maintained and consistent with current conditions. Proposed project improvements such as new bicycle lanes, traffic calming features, enhanced crosswalks, and new traffic signals would not be included under Alternative 2. The proposed project would reduce the number of driveways/curb cuts at the OSP Specific Plan Site from 31 under existing conditions to 15, which would reduce the opportunities for pedestrians and bicycles to interact with vehicles. While Alternative 2 would not increase design hazards compared to existing conditions and would result in a less than significant impact, Alternative 2 would not include the abovementioned improvements and would result in increased impacts compared to the proposed project.

Alternative 2 would result in reduced daily trips compared to the proposed project. The proposed project would result in less than significant impacts to freeway safety and off-ramp queuing. Therefore, Alternative 2 would similarly result in less than significant impacts to freeway safety and off-ramp queuing, and impacts would be reduced compared to the proposed project.

Emergency Access

The project site is located in an established urban area that is well served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles. Emergency access to the project site and surroundings is currently provided by Santa Cruz Street, Palos Verdes Street, Beacon Street, Harbor Boulevard, 1st Street, 2nd Street, 3rd Street, Mesa Street, Centre Street, and O'Farrell Street. As with the proposed project, Alternative 2 would include PDF T-1 for construction at the 327 Harbor Site, which would ensure that adequate emergency access to the project site and surroundings is maintained throughout construction. PDF T-1 would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 2, due to the substantial reduction in the number of construction workers and construction-related deliveries necessary for construction on the OSP Specific Plan Site. Under Alternative 2, the existing roadways and driveways serving the OSP Specific Plan Site would be maintained, and emergency access would continue to be provided by the abovementioned roadways consistent with current conditions. Therefore, Alternative 2 would result in less than significant impacts to emergency access. Due to the reduced construction activities on the OSP Specific Plan Site, impacts would be reduced compared to the proposed project.

n. Tribal Cultural Resources

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would generally involve the use of small hand and power tools typically used for housing renovation, instead of the large quantities of heavy-duty construction equipment that would be required under the proposed project. Because Alternative 2 would not involve construction of subterranean parking structures or grading on the OSP Specific Plan Site, rehabilitation activities on the OSP Specific Plan Site under this alternative would result in no impact to tribal cultural resources. However, Alternative 2 would involve grading and excavation activities on the 327 Harbor Site and, similar to the proposed project, Alternative 2 would implement Mitigation Measures TCR-1 through TCR-5, as well as CUL-3 through CUL-6, which would require monitoring for tribal cultural resources during ground-disturbing construction activities, continued consultation with local Native Americans if resources of Native American origin are unearthed during construction, and procedures for the proper treatment of tribal

cultural resources. These mitigation measures would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 2, as no ground disturbance would occur on the OSP Specific Plan Site. As such, Alternative 2 would result in a less than significant impact to tribal cultural resources with implementation of mitigation. Due to the reduced ground-disturbing activities, Alternative 2 would result in reduced impacts in comparison to the proposed project.

o. Utilities and Service Systems

Water

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would not involve ground disturbance. Nonetheless, construction activities associated with Alternative 2 would generate a short-term demand for water for dust control on the 327 Harbor Site. Specifically, at the 327 Harbor Site, approximately 27 days of construction would require dust suppression, resulting in approximately 15,149 gallons of water use during construction (South Coast Air Quality Management District [SCAQMD] 2017). However, this demand would be less than the proposed project, as Alternative 2 would require reduced grading and less associated dust control activities in comparison to the proposed project. Furthermore, a reduction in the amount of floor area proposed by Alternative 2 as compared to the proposed project would reduce the overall construction period and the overall number of days of construction-related water demand. Accordingly, because the water demand for construction of the proposed project would be less than significant, the temporary and intermittent demand for water supplies during construction of Alternative 2 would also be less than significant. Additionally, Alternative 2 would require installation of fewer water line connections as no new buildings would be constructed on the OSP Specific Plan Site. Similar to the proposed project, Alternative 2 would construct necessary on-site water infrastructure at the 327 Harbor Site in compliance with applicable City requirements to accommodate new buildings. The potential environmental effects associated with new water infrastructure under Alternative 2 are analyzed throughout this section, concurrently with the alternative as a whole. As such, under Alternative 2, impacts to water infrastructure during construction would be less than significant. Due to the reduced water demand during construction, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Operation

Operation of Alternative 2 would result in a net increase of 7.9 AFY of water demand due to the operation of 47 residential units at the 327 Harbor Site, based on the LADWP standard water use factors and not accounting for the proposed water efficiency features (LADWP 2022). This would equate to a net water demand of 126.94 AFY at the project site, which would be less than the proposed project's estimated increase in water demand. Therefore, as with the proposed project, under Alternative 2, estimated water demand would similarly be met by the available water supplies projected by LADWP in normal, single-dry, and multiple-dry years through the year 2040. As such, impacts on water supply during operation of Alternative 2 would be less than significant. Due to the reduction of water demand during operation, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Wastewater

Construction

Similar to the proposed project, construction of Alternative 2 would involve the installation of new or relocated sewer connections at the 327 Harbor Site. As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would not involve ground disturbance. These activities would be confined to trenching to install the sewer lines below surface and would be limited to connections intersecting existing off-site mains/lines with adequate capacity to accommodate the increased wastewater from the project site. Given that wastewater flows generated by Alternative 2 would be less than those of the proposed project, it is anticipated that there would be sufficient capacity within existing sewer lines surrounding the project site to serve wastewater flows generated by Alternative 2. However, detailed gauging and evaluation would be required as part of the permit process to identify specific sewer connection points, as is typical for all projects in Los Angeles. All related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN standards, similar to the proposed project. The potential environmental effects associated with new infrastructure under Alternative 2 are analyzed throughout this section, concurrently with the proposed project as a whole. As such, under Alternative 2, construction-related impacts to wastewater would be less than significant. Due to the reduced construction activities related to wastewater infrastructure and shortened schedule, the impacts would be reduced in comparison to the proposed project.

Operation

Based on the Los Angeles Bureau of Sanitation's (LASAN) wastewater generation factors, operation of Alternative 2 would generate a net increase of approximately 7,050 gallons per day in wastewater flows from the project site because of the construction of 47 new dwelling units at the 327 Harbor Site (LASAN 2012). However, because the total floor area and population growth would be less under Alternative 2 in comparison to the proposed project, operational wastewater generated by Alternative 2 would be less than the proposed project. Wastewater generated during operation of the proposed project would be accommodated by the existing capacity of the Terminal Island Water Reclamation Plant. As the operational wastewater generation under Alternative 2 would be less than the proposed project, the existing capacity of the Terminal Island Waste Reclamation Plant would also be adequate to serve Alternative 2. As such, under Alternative 2, impacts related to wastewater generation and infrastructure capacity would be less than significant. Due to the reduced wastewater flows, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Solid Waste

Construction

As previously stated, rehabilitation activities on the OSP Specific Plan Site under Alternative 2 would not involve ground disturbance; thus, this alternative would result in substantially less grading and soil removal activities than the proposed project and solid waste generated during construction of Alternative 2 would be less than the proposed project. Specifically, excavation on the 327 Harbor Site would remove approximately 4,300 cubic yards of soil. Similar to the project, construction debris generated by Alternative 2 would be subject to the LAMC Section 66.32, which would ensure at least 75 percent of the nonhazardous construction waste generated by future development would be diverted from landfills serving Los Angeles. Similar to the proposed project, construction waste generated by Alternative 2 would represent less than one percent of the waste disposal capacity in

the region. Therefore, construction of Alternative 2 would not create a need for additional solid waste disposal facilities to adequately handle construction-generated waste. Construction of Alternative 2 would result in a less than significant impact related to solid waste. Due to the reduced amount of construction waste, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Operation

As shown in Table 6-4, operation of Alternative 2 is estimated to generate a net increase of less than one ton per day, which is approximately 96 percent less solid waste in comparison to the proposed project. Existing landfills serving the city have a total remaining daily capacity of 25,640 tons per day. Therefore, the solid waste generated by operation of Alternative 2 would not require additional solid waste infrastructure. As such, operation of Alternative 2 would result in a less than significant impact related to solid waste. Because the amount of estimated solid waste would be less than the proposed project, Alternative 2 would result in reduced impacts in comparison to the proposed project.

Table 6-4 Alternative 2 Estimated Daily Solid Waste Generation

Land Use	Alternative 2	Solid Waste Generation Rate	Daily Total	Annual Total
New Residential	47 du	12.23 lbs/du/day	574.81 lbs (0.29 tons)	209,806 lbs (104.9 tons)
Total			**574.81 lbs (0.29 tons)**	**209,806 lbs (104.9 tons)**
Proposed Project Solid Waste Generation			14,372 lbs (7.2 tons)	5,245,780 lbs (2,622.9 tons)
Percentage Reduction from Proposed Project				**96.0%**

lbs = pounds; du = dwelling units

Electric Power, Natural Gas, and Telecommunications Infrastructure

Construction

Construction-related activities of Alternative 2 would not involve consumption of natural gas or result in impacts to telecommunication services. Minor quantities of electric power for lighting, power tools, and other support equipment would be required; however, energy consumed during construction of Alternative 2 would be finite and limited, and would not result in the need for relocation or construction of new or expanded electric power facilities. Existing electric power, natural gas, and telecommunications infrastructure are available to serve the proposed project, and therefore, would be available to serve Alternative 2. Because Alternative 2 would require a shorter construction period because less construction would occur in comparison to the proposed project, the overall amount of electricity required during construction would be reduced. As such, under Alternative 2, impacts to electric power, natural gas, and telecommunications infrastructure would be less than significant, and reduced compared to the proposed project.

Operation

Alternative 2 would increase electricity demand on the project site to accommodate the 47 new residential units at the 327 Harbor Site under the Historic Rehabilitation Alternative. Alternative 2 would demand 304,146 kilowatt-hours per year of electricity (Appendix B). Because the residences

constructed at the 327 Harbor Site would be all-electric, no natural gas infrastructure would be required; therefore, natural gas usage on the project site would remain the same as under existing conditions (3,322,489 cubic feet per year). Alternative 2 consists of less new development than the proposed project, and therefore, the overall demand for electric power, natural gas, and telecommunications infrastructure would be reduced in comparison to the proposed project. The proposed project was found to result in less than significant impacts to electric power, natural gas, and telecommunications facilities. Given the reduced amount of new development in comparison to the proposed project, Alternative 2 similarly would not require the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, and impacts would be less than significant. Due to the reduced demand for electric power, natural gas, and telecommunications, Alternative 2 would result in reduced impacts compared to the proposed project.

6.5.3 Comparison of Impacts

Alternative 2 would eliminate the proposed project's significant and unavoidable impacts with respect to historical resources, as the existing Rancho San Pedro Complex buildings would be rehabilitated in accordance with the Secretary's Standards. Alternative 2 would reduce construction noise and vibration impacts from construction activities on the OSP Specific Plan Site but would still result in significant and unavoidable construction noise and vibration impacts due to construction activities on the 327 Harbor Site. Because Alternative 2 would not include new outdoor public spaces with amplified events on the OSP Specific Plan Site, operational noise impacts would be less than significant. The significance of impacts associated with the majority of the remaining environmental issues would be similar to or less than those of the proposed project. However, as described above, impacts related to consistency with transportation plans and transportation safety, while still less than significant, would be increased compared to the proposed project.

6.5.4 Relationship of the Alternative to Project Objectives

Alternative 2 would not meet the proposed project's underlying purpose to revitalize the project site through the transformation of the community into a mixed-income, mixed-use neighborhood for current and future residents as it would not result in a mixed-income, mixed-use development. It would not be possible to add non-residential uses or mixed-income residential units to the project site under Alternative 2 without removing existing affordable housing units due to the size constraints of the existing property and the configuration of the existing buildings. Alternative 2 would meet or partially meet some of the project objectives but would not meet the majority of the objectives, as described below.

Alternative 2 would fully meet the following project objective:

- Ensure existing tenants' first right to re-occupy units appropriate to household size through phasing of development and providing a mix of low- and moderate-income units.
    - This alternative would minimize displacement of the existing tenants by giving them first right to re-occupy appropriately-sized units after rehabilitation.

Alternative 2 would partially meet the following objectives:

- Implement green design practices to ensure environmental sustainability, including, but not limited to, energy and water efficiency.
    - The 327 Harbor Site would be developed with the latest sustainable practices but there would only be limited upgrades at the OSP Specific Plan Site compared to the proposed project,

which would achieve LEED® Gold, Greenpoint, or similar rating system. While preservation of the existing buildings would reduce construction waste and materials consumption, the long-term, operational sustainability of the structures on the OSP Specific Plan Site would be reduced in comparison to the proposed project and this objective would not be fully met.

- Replace existing affordable housing units on the OSP Specific Plan Site with code-compliant affordable and moderate housing units in a variety of sizes and configurations to allow for a mix of household sizes, enhanced security and accessibility, and long-term useful life of buildings to minimize the future need for substantial repairs or replacement of the affordable housing.
  - The existing housing at the OSP Specific Plan Site would be modernized to the extent feasible, in conformance with the Secretary's Standards and in accordance with the California Historic Building Code. However, a mix of housing types would not be provided on the OSP Specific Plan Site and the enhanced security that would be provided under the proposed project through crime prevention design and on-site security personnel would not occur under Alternative 2. Additionally, this alternative would not fully meet the enhanced accessibility objective since it would not provide accessible residential units of a sufficient range of sizes and amenities to meet the requirements of Title 24 Section 8.26.
- Improve the housing stock in the community by demolishing existing buildings which contain lead and asbestos.
  - No buildings would be demolished in this alternative; however, the existing buildings would eventually be improved, and lead and asbestos would be remediated consistent with HACLA's building maintenance policies. Therefore, this objective would be partially met.

Alternative 2 would not achieve the following project objectives:

- Implement the policies of the City of Los Angeles General Plan Framework Element, the SCAG RTP/SCS, and the San Pedro Community Plan that encourage growth in urban infill areas to improve mobility options, enhance pedestrian opportunities, and reduce auto dependence.
  - Alternative 2 focuses primarily on rehabilitation of the existing residential units and maintenance of the parking configuration at the OSP Specific Plan Site. This alternative would not encourage growth on the infill project site or include the mixed uses and active transportation or public transit improvements included in the proposed project. Therefore, this alternative would not improve mobility options, enhance pedestrian opportunities, or reduce residents' dependency on automobiles.
- Provide a substantial increase in the number of affordable housing units, consistent with the goals of HACLA's 25-Year Vision Plan, the San Pedro Neighborhood Transformation Plan, and the City's Housing Element to expand the supply of affordable housing units in Los Angeles.
  - Alternative 2 would only result in new affordable housing at the 327 Harbor Site. No additional housing units would be constructed on the OSP Specific Plan Site. This alternative would result in only a 10-percent increase in affordable housing units, compared to the approximately 127-percent increase under the proposed project.
- Incorporate building designs that integrate into the surrounding neighborhoods, take advantage of waterfront views, provide a variety of building types, and integrate new amenities with a focus on developing a healthy and vibrant community.
  - The existing buildings do not take advantage of waterfront views or provide a variety of building types. Since the existing buildings on the OSP Specific Plan Site would remain in place

under Alternative 2 and their relationship to the project site and neighborhood would remain unchanged, this objective would not be met. In addition, none of the new amenities associated with the proposed project, such as publicly accessible open space, health care and wellness clinics, and youth and community centers, would be developed under Alternative 2 as no new development would occur on the OSP Specific Plan Site. Therefore, this objective would not be met.

- Create a mixed-use, mixed-income community that includes a mix of dwelling unit types and sizes, affordability levels, local-serving retail, community services, and active and passive open/green space.
  - Alternative 2 would not modify the existing mix of uses, affordability levels, and unit types and sizes at the OSP Specific Plan Site, as no new development would occur at that location, and would only add 46 affordable residential units and one market-rate unit at the 327 Harbor Site. Because no non-residential uses, market-rate rental units, market-rate homeownership units, or affordable homeownership units would be provided and only 46 new affordable units would be provided, this alternative would not create a mixed-use, mixed-income community and would not meet this objective.
- Create new recreation and park facilities that meet the needs and enhance safety of the future residents at the project site and the broader community.
  - Alternative 2 would not involve new recreation or park facilities. Therefore, this objective would not be met.

Alternative 2 would consist of new residential development only at the 327 Harbor Site and would not include any Neighborhood Serving Uses or commercial retail uses. Therefore, Alternative 2 would not provide additional affordable housing opportunities at the OSP Specific Plan Site or create a mixed-use, mixed-income infill community such that pedestrian opportunities are enhanced and dependence on vehicle travel is reduced. Alternative 2 would rehabilitate existing buildings containing lead and asbestos but would not provide new residential opportunities in these buildings. Alternative 2 would not create new recreation and park facilities to meet the needs of the broader community. Compared to the proposed project, Alternative 2 would not provide a variety of building types or integrate amenities which would substantially contribute to developing a healthy and vibrant community.

6.6 Alternative 3: Partial Preservation

6.6.1 Description

Under the Partial Preservation Alternative (Alternative 3), the original portion of Rancho San Pedro, completed in 1942 (refer to Figure 6-1), consisting of 284 dwelling units, would be preserved and rehabilitated in accordance with the Secretary's Standards and in accordance with the California Historic Building Code, as described above under Alternative 2. Building deficiencies identified under Alternative 2 would be remediated for those buildings to be preserved and rehabilitated, and the existing, original Rancho San Pedro buildings would continue to serve as public housing. The preserved and rehabilitated buildings would include 284 existing residential units. The Rancho San Pedro expansion that was completed in 1953, which includes 194 existing residential units, would be demolished in phases and redeveloped with new, improved multi-family housing, amenities, and commercial retail uses under a modified version of the OSP Specific Plan. There would be a total of

1,207 residential units on the OSP Specific Plan Site, consisting of 923 newly constructed residential units, including 194 replacement affordable housing units, 390 market-rate rental units, 275 affordable units, 32 market-rate homeownership units, and 32 affordable homeownership units. In addition, 45,000 sf of commercial uses, 61,500 sf of Neighborhood Serving Uses, and one acre of refurbished public open space and one acre of new open space would be developed. Under Alternative 3, development on the 327 Harbor Site would consist of a four-story, 47-unit multi-family affordable housing development, consistent with the proposed project. Table 6-5 provides a summary of the development on the OSP Specific Plan Site under Alternative 3 and Figure 6-2 provides the alternative's conceptual site plan for the OSP Specific Plan Site.

Table 6-5 Alternative 3 OSP Specific Plan Site Development Summary

Buildings							
Residential Uses (number of units)							
Preserved Affordable Housing		**Replacement Affordable Housing**		**Additional Rental Housing**		**Homeownership Units**	
One-Bedroom	92	One-Bedroom	8	Affordable Housing	275	Affordable	32
Two-Bedroom	144	Two-Bedroom	116	Market-Rate Rental	390	Market Rate	32
Three-Bedroom	48	Three-Bedroom	30				
		Four-Bedroom	30				
		Five-Bedroom	10				
Total	**284**	**Total**	**194**	**Total**	**665**	**Total**	**64**
Residential Gross Building Area (new)		1,118,280 sf					
Residential Gross Building Area (existing)		144,400 sf					
Total Residential Gross Building Area		**1,262,680 sf**					
Non-residential Land Uses							
Commercial Retail		Up to 45,000 sf					
Neighborhood Serving		Up to 61,500 sf					
Non-residential Gross Building Area		**Up to 106,500 sf**					
Overall OSP Specific Plan Site							
Floor Area		1,369,180					
FAR		1.51					
Parking							
Garage Parking Spaces (new)		1,340					
Surface and On-Street Vehicle Parking Spaces (existing and new)		120					
Total Vehicle Parking Spaces		**1,450**					
Secured Bicycle Parking Spaces		1,207					

Open Space and Landscaping	
Landscaped Area	347,955 sf
Publicly Accessible Open Space	80,000 sf
Common Open Space	213,337 sf
Private Open Space	60,350 sf
Total Open Space	**353,687 sf**

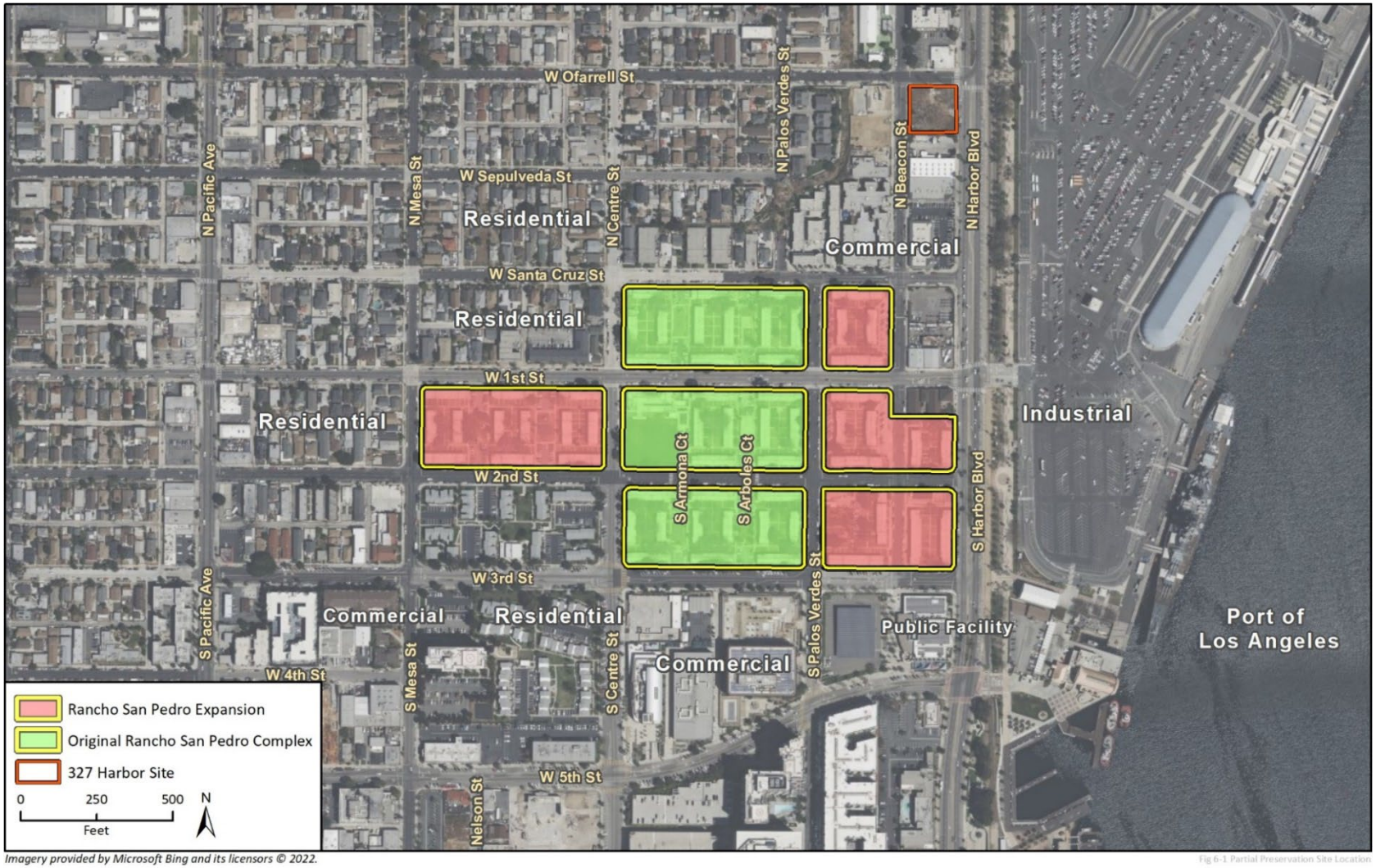
sf = square feet

Under Alternative 3, the primary movement of vehicles would be along Santa Cruz Street, 3rd Street, Centre Street, and Harbor Boulevard, similar to the proposed project. The OSP Specific Plan Site would continue to be served by existing bicycle lanes on Harbor Boulevard and Pacific Avenue, and new bicycle lanes would be added along Centre Street, Mesa Street, Palos Verdes Street, 2nd Street, and Santa Cruz Street, similar to the proposed project. Sidewalks would be provided along all roadways; however, the enhanced walking trail proposed along 1st Street, 2nd Street, and the Palos Verdes Linear Park would not be included in Alternative 3 due to the altered site plan. Under Alternative 3 public transit improvements would be consistent with the proposed project. Under Alternative 3, the same roadway modifications would be implemented as the proposed project, except that additional diagonal parking on Centre Street between Santa Cruz Street and 2nd Street would not be constructed.

Similar to the proposed project, Alternative 3 would include a minimum of 50 sf of private open space per residence, for a total of 60,350 sf of private open space. Common open space under Alternative 3 would include courtyards and outdoor resident amenities totaling 213,337 sf. Public open space provided under Alternative 3 would total two acres and would consist of construction of the Harbor Plaza Park and refurbishment of the existing sports field at 2nd Street and Centre Street. Alternative 3 would also comply with the usable open space requirements established in LAMC Section 12.21 G, with minor modifications as proposed by the OSP Specific Plan, resulting in 353,687 sf of usable open space on the site.

The architecture, landscaping, lighting, and signage of the redeveloped portions of the OSP Specific Plan Site would be similar to those of the proposed project. On the preserved portion of the OSP Specific Plan Site, the existing architecture would remain, and minor improvements to the landscaping, lighting, and any signage would be implemented to provide consistency with the redeveloped portion of the site. Utility upgrades and green building features would be consistent with the proposed project for newly constructed buildings on the OSP Specific Plan Site, with limited sustainable design upgrades to the rehabilitated, such as energy-efficient lighting and appliances and water efficient fixtures and appliances.

Figure 6-1 Alternative 3 Project Location Figure



Imagery provided by Microsoft Bing and its licensors © 2022.

Fig 6-1 Partial Preservation Site Location

Figure 6-2 Alternative 3 Conceptual Site Plan

Figure 6-3 Alternative 3 Building Heights

Construction of the 327 Harbor Site project component would be anticipated to commence in 2023, with completion in 2025. Construction activities and details on the 327 Harbor Site would be consistent with the proposed project. Construction on the 327 Harbor Site would include site preparation and grading, building construction, paving, and architectural coating. 4,300 cubic yards (cy) of uncertified artificial fill material would be removed from the 327 Harbor Site and ground disturbance would extend to a maximum depth of 45 feet below ground surface (bgs).

Construction on the OSP Specific Plan Site under Alternative 3 would span approximately 11 years. It is anticipated construction activities on the OSP Specific Plan Site would commence in 2024 and end in 2035. In total, 212,940 sf of building material would be demolished. The maximum depth of excavation on the OSP Specific Plan Site would be 25 feet bgs for the removal of uncertified fill and construction of the two-level underground parking structures. A total of approximately 154,196 cy of soil would be exported from the OSP Specific Plan Site. Development under Alternative 3 would occur in three main Phases, each with multiple construction stages, consistent with the proposed project. The three Phases are illustrated in Figure 6-2. Construction of Phase 1 would occur between 2024 and 2030. Construction of Phase 1 would include demolition of 84 units, rehabilitation of 72 units, and development of 256 new residential units and 9,500 sf of Neighborhood Serving Uses. Construction of Phase 2 would occur between 2031 and 2035. Construction of Phase 2 would include demolition of 36 units, rehabilitation of 108 units, and development of 396 new residential units, 20,000 sf of commercial retail uses, and 33,500 sf of Neighborhood Serving Uses. Construction of Phase 3 would occur between 2034 and 2037. Construction of Phase 3 would include demolition of 74 units, rehabilitation of 104 units, and development of 508 new residential units, 25,000 sf of commercial retail uses, and 18,500 sf of Neighborhood Serving Uses.

Construction would primarily occur Monday through Friday between the hours of 7:00 a.m. to 3:30 p.m., with occasional work on Saturdays or past 3:30 p.m. on weekdays. Haul trucks would export soil and materials to the Sunshine Canyon Landfill in unincorporated Los Angeles County and the Azusa Land Reclamation in the city of Azusa. Construction hauling would primarily be directed along 1st Street, 3rd Street, and Harbor Boulevard to minimize potential traffic impacts to existing residents. A Construction Management Plan, including haul routes, worker parking, job site informational signage, delivery and material off-haul hours, traffic control plan, and schedule would be implemented during project construction.

6.6.2 Impact Analysis

a. Aesthetics

Scenic Vistas

Construction

Similar to the proposed project, under Alternative 3 construction equipment may partially block views of surrounding development; however, construction would not affect scenic vistas identified in the San Pedro Community Plan due to the intervening distance, intervening development, and orientation of the project site relative to scenic vistas. Construction activities would not affect views from Harbor Boulevard east toward the Pacific Ocean, north toward Vincent Thomas Bridge, or south toward Ports O' Call Village because construction activities would occur west of Harbor Boulevard. Construction activities would be temporary and equipment would be removed upon completion. Alternative 3 would result in a less than significant impact to scenic vistas during construction, similar to the

proposed project. Due to the reduced construction activities at the OSP Specific Plan Site under Alternative 3, impacts would be reduced compared to the proposed project.

Operation

Alternative 3 would result in the introduction of new buildings on the project site, ranging from one to eight stories in height. Similar to the proposed project, Alternative 3 would occur west of Harbor Boulevard and would not interfere with views from that roadway toward the Ports O' Call Village, the Vincent Thomas Bridge, or the Pacific Ocean beyond. Under existing conditions, buildings, trees, and roadways already obstruct views toward the western foothills of the Palos Verdes Peninsula, and the introduction of taller buildings under Alternative 3 would not substantially diminish these views further. Finally, as easterly views of the Pacific Ocean are obscured by existing development and mature trees in the linear park that parallels Harbor Boulevard, increased density and height on the project site under Alternative 3 would not substantially block public views of the Pacific Ocean, similar to the proposed project. As such, Alternative 3 would result in a less than significant impact related to scenic vistas, and impacts would be similar to the proposed project.

Scenic Highways

There are no State-designated Scenic Highways within or visible from the project site. Harbor Boulevard is a locally-designated scenic corridor; however, construction of Alternative 3 would not affect views of scenic resources to the east, north, and south of Harbor Boulevard as construction would occur west of Harbor Boulevard. Similar to the proposed project, construction impacts to scenic resources within a scenic roadway would be less than significant. Alternative 3 would not result in development that would interfere with or otherwise adversely affect a State-designated Scenic Highway or scenic resources along Harbor Boulevard identified by the San Pedro Community Plan. Overall, Alternative 3 would have no impact to scenic resources, including trees, rock outcroppings, and historic resources, in a State-designated Scenic Highway, and impacts would be similar to the proposed project.

Visual Character and Quality

Construction

As previously stated, under Alternative 3, construction equipment may partially block views of scenic quality in the project site vicinity; however, Mitigation Measure AES-1 would be implemented during construction of Alternative 3 to shield construction activity from outside views. Construction contractors under both Alternative 3 and the proposed project would be required to comply with applicable City regulations related to construction activities, including trash removal and equipment storage, which would reduce the potential for construction impacts to visual character and quality. As such, Alternative 3 would result in a less than significant impact to visual character and quality with implementation of mitigation, and impacts would be similar to the proposed project.

Operation

Alternative 3 would rehabilitate 284 existing residential units, demolish 194 existing residential units, and construct 923 new residential units along with new commercial retail and Neighborhood Serving Uses on the OSP Specific Plan Site and would develop the 327 Harbor Site with a four-story residential building. Similar to the proposed project, Alternative 3 includes buildings of varied heights with changes in massing and building orientation and contemporary architectural finishes on those

portions of the site that would be redeveloped. The architecture, landscaping, lighting, and signage of the redeveloped portions of the OSP Specific Plan Site would be similar to those of the proposed project. Rehabilitation of the original portion of Rancho San Pedro would include repairing damaged façades and modernizing the building interiors, and the rehabilitated portion of the project site would appear nearly identical to existing conditions. Similar to the proposed project, Alternative 3 would be developed in accordance with the goals and objectives of the General Plan, the San Pedro Community Plan, and the Pacific Corridors Redevelopment Plan to improve and enhance visual character throughout the San Pedro community to the extent feasible. As such, operational impacts to visual character and quality would be less than significant under Alternative 3. Although Alternative 3 would not specifically conflict with these plans and policies, it would be less compatible with these plans and policies compared to the proposed project due to the scale and design differences between the rehabilitated and redeveloped portions of the OSP Specific Plan Site. Alternative 3 would result in increased impacts related to visual character and quality in comparison to the proposed project.

Light and Glare

Construction

Construction of Alternative 3 would adhere to the same LAMC standards limiting construction hours as the proposed project. Similar to the proposed project, construction of Alternative 3 may require limited evening lighting from 4:30 p.m. to 6:30 p.m. during the winter months. However, Mitigation Measure AES-2 would be implemented, which would require outdoor construction lighting to be shielded from adjacent residential properties and the public rights-of-way. As such, construction of Alternative 3 would result in a less than significant impact related to light and glare with implementation of mitigation. However, due to the reduced construction period, Alternative 3 would result in reduced impacts related to light and glare than the proposed project.

Operation

Because Alternative 3 would feature less dense development in comparison to the proposed project, operation of Alternative 3 would include fewer light sources from interior lights spilling from windows, exterior lighting on buildings, and streetlights along walkways. Lighting would be installed in accordance with the same LAMC regulations that apply to the proposed project to reduce light pollution. Alternative 3 would implement PDF AES-1 and PDF AES-2, which are designed to reduce the effects of light spillage, glare from reflective surfaces, and other light and glare sources. As such, similar to the proposed project, operation of Alternative 3 would result in a less than significant impact related to light and glare. Because Alternative 3 would result in the introduction of less light and glare than the proposed project, Alternative 3 would result in reduced impacts related to light and glare compared to the proposed project.

Additionally, as shown in the shadow simulations provided in Section 4.1, *Aesthetics*, the proposed project would result in less than significant impacts related to shade and shadow at off-site sensitive land uses. On the 327 Harbor Site and redeveloped portions of the OSP Specific Plan Site under Alternative 3, buildings of similar configuration, massing, and height to those of the proposed project would be developed. On the rehabilitated portions of the project site, buildings would remain consistent with current heights and no shadow impacts would occur. As such, impacts related to shade and shadow would be less than significant under Alternative 3, and impacts would be similar to the proposed project.

b. Air Quality

Criteria Pollutant Emissions

Construction

REGIONAL EMISSIONS

As with the proposed project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emission would result from demolition and construction activities. As described in Section 4.2, *Air Quality*, regional air pollutant emissions during construction would be less than significant with implementation of Mitigation Measure AQ-1. Alternative 3 would similarly implement Mitigation Measure AQ-1 to reduce construction emissions. In addition, the intensity and duration of construction activities would be reduced under Alternative 3 due to the reduced demolition and grading activities and reduced total square footage of building construction in comparison to the proposed project. However, the overall phasing of construction under Alternative 3 would result in similar overlapping construction activities as the proposed project. Therefore, the maximum daily air pollutant emissions and fugitive dust from construction activities under Alternative 3 would be similar to the proposed project, although the duration that these air emissions would occur would be reduced. As such, construction of Alternative 3 would result in less than significant impacts related to regional air pollutant emissions with implementation of mitigation, and impacts would be reduced compared to the proposed project.

LOCALIZED EMISSIONS

Under Alternative 3, construction activities would be located at a similar distance to sensitive receptors and daily maximum air pollutant emissions would be similar to those of the proposed project. Alternative 3 would implement Mitigation Measure AQ-1 to reduce air pollutant emissions during construction. The proposed project was determined to result in a less than significant impact related to localized construction emissions with implementation of Mitigation Measure AQ-1. As such, under Alternative 3, impacts associated with localized construction emissions would be less than significant with mitigation, and impacts would be reduced compared to the proposed project due to the reduced construction period.

Operation

REGIONAL EMISSIONS

New development under Alternative 3 would be reduced compared to the proposed project. As a result, the number of new daily trips generated by Alternative 3 would be lower than the proposed project. Accordingly, because vehicular emissions depend on the number of trips and daily VMT to the project site, the overall pollutant emissions generated by Alternative 3 would be reduced in comparison to the proposed project. Additionally, with the reduction in overall floor area, operational area and stationary source emissions would be reduced in comparison to the proposed project. In addition, similar to the proposed project, Alternative 3 would implement Mitigation Measure AQ-2 to further reduce VOC emissions associated with landscaping maintenance. As such, impacts associated with regional air pollutants during operation of Alternative 3 would be less than significant with mitigation. Impacts under Alternative 3 would be reduced in comparison to the proposed project due to the reduced vehicle trips and overall floor area.

LOCALIZED EMISSIONS

Localized operational emissions impacts are determined primarily by traffic volumes. Alternative 3 would reduce the total number of residential units at the project site by 346 units, compared to the proposed project. The reduced development under Alternative 3 would result in less associated vehicle trips than the proposed project, and therefore, Alternative 3 would result in less localized operational air emissions from mobile sources. Similarly, operational area and stationary sources of emissions would be reduced compared to the proposed project due to the reduced buildout under Alternative 3. As such, under Alternative 3, localized air pollutant emissions during operation would be less than significant, and reduced compared to the proposed project.

Toxic Air Contaminants

Construction

As with the proposed project, construction of Alternative 3 would generate toxic air contaminants associated with heavy equipment use. Overall, the toxic air contaminants generated by construction of Alternative 3 would be lower than the proposed project because there would be less heavy machinery use and a shortened construction timeline due to reduced grading, demolition, and building construction activities. In addition, similar to the proposed project, Alternative 3 would implement Mitigation Measure AQ-1, which requires the use of Tier 4 and electric construction equipment to reduce pollutant emissions. The proposed project would result in less than significant impacts associated with toxic air contaminants during construction with implementation of Mitigation Measure AQ-1. Similarly, under Alternative 3, construction impacts related to toxic air contaminants would be less than significant with mitigation and reduced compared to the proposed project due to the reduced construction activities.

Operation

Similar to the proposed project, Alternative 3 would not include land uses that result in the exposure of sensitive receptors to toxic air contaminants. Alternative 3 would not place sensitive receptors within 500 feet of a high-volume roadway. Alternative 3 would involve the rehabilitation of some existing buildings and the construction of new buildings in accordance with Title 24 standards, including installation of MERV 13 filtration systems to reduce particulate matter emissions by at least 70 percent. Additionally, Alternative 3 would decrease the number of truck deliveries, vehicle trips, and associated diesel fuel emissions because Alternative 3 would include reduced residential units and Neighborhood Serving Uses. Operation of the proposed project would result in less than significant operational impacts related to toxic air contaminants. As such, under Alternative 3, operational impacts related to toxic air contaminants would be less than significant, and reduced compared to the proposed project.

c. Cultural Resources

Historical Resources

Under Alternative 3, the original portion of the Rancho San Pedro Complex (comprising approximately 59 percent of the existing units) would be rehabilitated in conformance with the Secretary's Standards and in accordance with the California Historic Building Code. Demolition of approximately 41 percent of the existing units in the Rancho San Pedro Complex would occur in order to redevelop portions of the site with denser, mixed uses. Alternative 3 would implement Mitigation Measures CUL-1 and

CUL-2, which would include installation of an interpretive display on the OSP Specific Plan Site and additional information online about the history of the Rancho San Pedro Complex. Nonetheless, similar to the proposed project, Alternative 3 would demolish portions of a historical resource, and therefore, result in a significant and unavoidable impact to historical resources. Because Alternative 3 would result in only partial demolition of the Rancho San Pedro Complex, reduced impacts would occur under Alternative 3 when compared to the proposed project.

Archaeological Resources

Alternative 3 would result in less ground-disturbing activities at the OSP Specific Plan Site during construction than the proposed project; therefore, the potential for Alternative 3 to uncover buried archaeological resources would be reduced compared to the proposed project. Similar to the proposed project, Alternative 3 would implement Mitigation Measures CUL-3 through CUL-6, which would require standard procedures during construction to be followed in the event an archaeological resource is discovered. As such, under Alternative 3, impacts to archaeological resources would be less than significant with mitigation incorporated. Due to the reduced ground disturbance and potential to encounter buried archaeological resources, Alternative 3 would result in reduced impacts compared to the proposed project.

Human Remains

Alternative 3 would result in less ground-disturbing activities at the OSP Specific Plan Site during construction than the proposed project; therefore, the potential for Alternative 3 to uncover human remains would be reduced compared to the proposed project. Nonetheless, Alternative 3 would still involve grading and excavation activities, and there would be the potential to impact human remains. This alternative would implement Mitigation Measure CUL-7, which provides procedures for the proper treatment of human remains if any are uncovered during construction. With mitigation, Alternative 3 would result in less than significant impacts to human remains. Due to the reduced ground disturbance and potential to encounter human remains, Alternative 3 would result in reduced impacts compared to the proposed project.

d. Geology and Soils

Geology and Soils

Under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to the proposed project's impacts because these impacts are a function of the project site's underlying geologic conditions rather than the type or amount of land use proposed. Alternative 3 would be designed and constructed to conform to the current seismic design provisions of the California Building Code, California Historic Building Code, and Los Angeles Building Code, as applicable. Alternative 3 would also implement Mitigation Measures GEO-1 and GEO-2 for newly constructed buildings on the OSP Specific Plan Site and 327 Harbor Site, which require submittal of a final design-level geotechnical report to identify and minimize seismic risks and retention of a certified geotechnical professional to test foundations during construction. These mitigation measures would not be applicable to rehabilitation activities on the OSP Specific Plan Site under Alternative 3. Therefore, as with the proposed project, Alternative 3 would not cause or accelerate geological conditions that could result in substantial damage to infrastructure or expose people to substantial risk of injury. As such, similar to the proposed project, Alternative 3 would result in less than

significant impacts related to geology and soils. Due to the reduced number of residential units, fewer people would reside on the project site under Alternative 3 than the proposed project; thus, Alternative 3 would expose fewer people to geologic and soil hazards and would result in reduced impacts compared to the proposed project.

Paleontological Resources

Alternative 3 would result in less ground-disturbing activities at the OSP Specific Plan Site than the proposed project; therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be reduced in comparison to the proposed project. Similar to the proposed project, Alternative 3 would implement Mitigation Measure GEO-3, which would minimize the potential for impacts to paleontological resources to occur during ground-disturbing activities. As such, under Alternative 3, potential impacts to paleontological resources would be less than significant with mitigation incorporated. Due to the reduced potential to encounter paleontological resources on the OSP Specific Plan Site, impacts would be reduced under Alternative 3 in comparison to the proposed project.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. Alternative 3 would result in a reduction in VMT compared to the proposed project because Alternative 3 would result in less population growth. As with the proposed project, Alternative 3 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code and would implement PDF GHG-1 through PDF GHG-3, which would ensure that this alternative would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Therefore, Alternative 3 would result in less than significant impacts related to GHG emissions. Due to reduced buildout and associated GHG emissions, Alternative 3's impacts related to GHG emissions would be reduced compared to the proposed project.

f. Hazards and Hazardous Materials

Construction

Under Alternative 3, some of the existing residential buildings on the OSP Specific Plan Site would be rehabilitated, including removal of hazardous buildings materials such as LBP and ACM, while some of the existing buildings would be demolished. Alternative 3 would involve less grading at the OSP Specific Plan Site than the proposed project; therefore, disturbance of contaminated soils during construction of Alternative 3 would also be reduced compared to the proposed project. Construction of Alternative 3 would temporarily increase the transport, use, storage, and disposal of construction-related hazardous materials and petroleum products, similar to the proposed project. However, such uses would be reduced compared to the proposed project because of the reduced construction activities necessary under Alternative 3. Construction of Alternative 3 would comply with the same applicable federal and State regulations for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste as the proposed project. Alternative 3 would also implement Mitigation Measures HAZ-1 through HAZ-5, which would ensure proper and safe procedures for handling, transport, and disposal of contaminated soils, as well as implementation of a construction vapor monitoring plan and vapor mitigation systems, if required, for newly constructed buildings. With implementation of mitigation, construction impacts related to hazardous materials

would be less than significant under Alternative 3. Due to the reduced ground disturbance associated with Alternative 3, construction impacts related to hazardous materials would be reduced in comparison to the proposed project.

Similar to the proposed project, construction of Alternative 3 may temporarily increase traffic on Harbor Boulevard and Pacific Avenue. However, lane closures would be temporary and no full roadway closures would be required. Potential temporary traffic and access disruption that may occur during construction of Alternative 3 would be addressed by implementation of PDF T-1, which would include a traffic control plan. Therefore, construction impacts to emergency evacuation under Alternative 3 would be less than significant, and impacts be similar to the proposed project.

Operation

Similar to the proposed project, operation of Alternative 3 would involve the use of hazardous materials commonly used in residential and commercial retail developments, such as cleaning agents, paints, pesticides, and materials used for landscaping, which do not typically involve the use or storage of large quantities of hazardous materials. However, due to the reduced buildout of Alternative 3, fewer household hazardous materials would be used compared to the proposed project. The use of hazardous materials during operation of Alternative 3 would occur in accordance with applicable federal, State, and local requirements. As such, under Alternative 3, potential operational impacts related to hazards and hazardous materials use would be less than significant. Due to the reduced density and associated use of hazardous materials, impacts under Alternative 3 would be reduced in comparison to the proposed project.

Similar to the proposed project, operation of Alternative 3 would not involve activities that would interfere with an adopted emergency response or evacuation plan. Alternative 3 would implement similar roadway modifications as the proposed project, including traffic signals that would improve traffic flow along Harbor Boulevard and Pacific Avenue and would not interfere with emergency response or emergency evacuation along these two designated evacuation routes. Under Alternative 3, driveways and internal circulation would be designed to meet applicable local standards regarding site access, which would be confirmed during LAFD's fire/life safety plan review and inspection. Furthermore, Alternative 3 would result in less vehicle traffic in comparison to the proposed project due to a reduction in buildout. As such, under Alternative 3, potential operational impacts related to interference with emergency evacuation and response would be less than significant, and impacts would be reduced in comparison to the proposed project.

g. Hydrology and Water Quality

Surface Water

Construction

Alternative 3 would reduce the degree to which new pollutants could be introduced to the project site in comparison to the proposed project because Alternative 3 would include less demolition and construction activities. Similar to the proposed project, a SWPPP would be prepared for Alternative 3 and would specify BMPs to be implemented to control runoff and minimize the potential for erosion and pollutants to enter surface waters during construction. Additionally, similar to the proposed project, if dewatering is required for construction of subterranean parking structures, dewatering activities would be carried out in compliance with NPDES Permit No. CAG994004. With compliance with NPDES and City regulations, construction of Alternative 3 would not result in discharge that

would violate any water quality standard or waste discharge requirements, or substantially alter the amount of surface water flow. As such, under Alternative 3, construction-related impacts to surface water would be less than significant. Due to the reduced ground-disturbing activities, Alternative 3 would result in reduced construction-related impacts to surface water compared to the proposed project.

Operation

Similar to the proposed project, Alternative 3 would implement BMPs for managing post-construction stormwater runoff in compliance with the City's LID ordinance requirements. Implementation of the BMPs on the project site would control stormwater and prevent discharges from violating surface water quality standards or waste discharge requirements. Similar to the proposed project, Alternative 3 would implement an approved Stormwater Management Program and Water Quality Management Program to ensure stormwater is appropriately retained on site, stormwater runoff flows are not increased above existing conditions, and stormwater discharged into the City's stormwater drainage system meets or exceeds the required water quality standards. As such, impacts to surface water during operation of Alternative 3 would be less than significant. These impacts would be similar to those under the proposed project.

Groundwater

Construction

During construction of Alternative 3, hazardous materials such as fuels, paints, solvents, and concrete additives would be used and could increase the opportunity for hazardous materials releases into groundwater. However, Alternative 3 construction activities would be carried out in accordance with NPDES and City regulations to reduce impacts to groundwater quality, similar to the proposed project. The removal of contaminated soils on the project site would occur with oversight by the appropriate regulatory agency, which would require all proposed construction activities to follow the procedures necessary to prevent soil removal and remediation activities from affecting groundwater quality. Similar to the proposed project, imported fill materials used for Alternative 3 would be nonhazardous. Compliance with federal, State, and local requirements for the handling, use, storage, and disposal of hazardous materials and contaminated soil, would reduce the potential for construction of the project to release contaminants into groundwater that could interact with existing contaminants, expand the area or increase the level of groundwater contamination, and/or cause a violation of regulatory water quality standards. Furthermore, due to the limited and temporary nature of potential dewatering activities during project construction, impacts to groundwater levels would be minimal, similar to the proposed project. Dewatering activities would not deplete groundwater supplies because (1) the distance between the project site and the nearest City groundwater well is down-gradient and (2) potential site dewatering would be conducted only when shallow groundwater conditions are encountered. As such, under Alternative 3, impacts to groundwater would be less than significant. Due to the reduced ground disturbance under Alternative 3, impacts would be reduced compared to the proposed project.

Operation

Similar to the proposed project, Alternative 3 would not include installation or operation of water wells, an extraction or recharge system, a municipal supply well, or a spreading ground facility. Similar to the proposed project, Alternative 3 would not require long-term dewatering activities. No underground storage tanks would be placed beneath the project site, and hazardous materials

associated with operation of Alternative 3 would be limited to common household hazardous materials.

Alternative 3 would remove polluted soils underlying the project site, which would reduce the potential for impacts to groundwater quality during operation of Alternative 3. Alternative 3 would include similar amounts of impervious surfaces as the proposed project and would include open space and landscaping, as well as stormwater infiltration BMPs, to offset the increase in impervious surfaces. Similar stormwater management features as included in the proposed project would be developed as part of Alternative 3 and would assist in the collection and treatment of stormwater and the process of groundwater recharge. As such, Alternative 3 would result in less than significant impacts to groundwater during operation. Due to the reduced density and associated use of household hazardous materials, impacts would be reduced compared to the proposed project.

h. Land Use and Planning

Division of an Established Community

During construction of Alternative 3, temporary lane closures, as well as the fencing of portions of the project site during active construction for safety and screening purposes, would be required. Similar to the proposed project, Alternative 3 would implement PDF T-1, which would ensure there is adequate signage and safe alternative access for existing Rancho San Pedro residents and the surrounding community during construction. Construction of Alternative 3 would not physically divide an established community and construction impacts would be less than significant, similar to the proposed project.

Similar to the proposed project, Alternative 3 would develop a mix of uses and improve neighborhood connections through enhancements for those walking and bicycling, while managing motor vehicle circulation safely throughout the neighborhood. Existing roadways within the project site boundaries would be maintained and improved through a mixture of proposed new signals, curb extensions, and raised crosswalks for safer circulation of all modes. No new roadways, railways, or other features that could divide the community are proposed as part of Alternative 3. Therefore, operation of Alternative 3 would not divide an established community and impacts would be less than significant, similar to the proposed project.

Consistency with Land Use Plans and Policies

Alternative 3 would include a mix of similar uses to the proposed project but would reduce the amount of residential units and Neighborhood Serving Uses and overall density compared to the proposed project. Alternative 3 would involve adoption of a modified version of the OSP Specific Plan, which would change the zoning of the OSP Specific Plan Site to C2-2 and increase the allowable density and heights of development on the site. The modified OSP Specific Plan would regulate the OSP Specific Plan Site's permitted land uses, circulation, open space, and development standards that would transition the types and intensities of land uses within the project site and in the surrounding community to the extent feasible. Alternative 3 would constitute a conforming land use with the adoption of the modified OSP Specific Plan. Development proposed on the 327 Harbor Site would also conform to the permitted land uses and zoning requirements, as it would under the proposed project.

Similar to the proposed project, Alternative 3 would offer a mix of uses on the OSP Specific Plan Site, thereby reducing the need for residents to travel off site to meet their retail/commercial needs. Accordingly, Alternative 3 would not conflict with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth by the

City's General Plan, the San Pedro Community Plan, the Pacific Corridors Redevelopment Plan, and SCAG's 2020-2045 RTP/SCS. As such, under Alternative 3, impacts related to land use and planning would be less than significant. These impacts would be similar to those under the proposed project.

i. Noise

Noise

Construction

The types of construction activities undertaken as part of Alternative 3 would be similar to the proposed project. As with the proposed project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Construction noise levels would be reduced through implementation of Mitigation Measure NOI-1, which would require noise barriers and other measures to reduce construction noise. However, as with the proposed project, construction noise would exceed City thresholds and result in significant and unavoidable impacts. As such, noise generated during construction of Alternative 3 would result in a significant and unavoidable impact. Because the construction period under Alternative 3 would be shorter than the proposed project, Alternative 3 would result in reduced construction noise impacts compared to the proposed project.

Operation

Under Alternative 3, sources of operation noise would include on-site stationary noise sources and traffic. The proposed project's operational traffic increase would not exceed City noise thresholds; therefore, Alternative 3 would generate fewer vehicle trips than the proposed project due to the reduced development density and similarly would not exceed City noise thresholds. Alternative 3 would include rehabilitation of the existing sports field and other outdoor parks and plazas on the OSP Specific Plan Site, similar to the proposed project, and therefore, would implement Mitigation Measure NOI-2 to minimize stationary recreational noise. Similar to the proposed project, implementation of Mitigation Measure NOI-2 would reduce stationary recreational noise to the extent feasible; however, because the final design of potential recreational uses under Alternative 3 are not known, it may not be possible to reduce noise to below the applicable thresholds from these recreational areas. As such, Alternative 3 would result in a significant and unavoidable impact related to operational noise, similar to the proposed project.

Vibration

Construction

Similar to the proposed project, Alternative 3 would not require pile driving, and the greatest anticipated source of vibration during construction activities would be from a vibratory roller and other earth moving equipment, such as a dozer. Similar to the proposed project, roadway and utility work could occasionally occur within 25 feet of structures, and it is assumed large dozers and vibratory rollers may be used within 25 feet of the nearest receptors, which could result in peak vibration levels similar to the proposed project and in exceedance of appliable thresholds related to architectural impacts and human annoyance from construction-related vibration. Alternative 3 would implement Mitigation Measure NOI-3, which would reduce vibration levels below the threshold of significance for architectural damage. However, as with the proposed project, vibration levels could still exceed the human annoyance threshold of 72 VdB. As such, under Alternative 3, impacts related to human

annoyance from construction-related vibration would be significant and unavoidable. Because the construction period under Alternative 3 would be shorter than the proposed project, Alternative 3 would result in reduced impacts related to construction vibration in comparison to the proposed project.

Operation

Similar to the proposed project, operation of Alternative 3 would not include land uses that generate substantial groundborne vibration, such as a rail or subway. Therefore, operation of Alternative 3 would result in a less than significant impact related to groundborne vibration, and impacts would be similar to the proposed project.

j. Population and Housing

Construction

During construction of Alternative 3, there would be no direct impacts to population growth; however, construction activities would create short-term employment opportunities in the construction field, which could indirectly increase the population and demand for housing in the vicinity of the project site. However, the employment patterns of construction workers in southern California are such that it is not likely that they would relocate their households. Therefore, similar to the proposed project, construction activity associated with Alternative 3 would not indirectly cause population growth or accelerate the demand for housing. As such, impacts to population and housing during construction of Alternative 3 would be less than significant, similar to the proposed project.

Operation

Based on the San Pedro's average of 2.42 persons per households, Alternative 3 would result in a population growth of approximately 1,878 persons based on the total net increase of 729 residential units on the OSP Specific Plan Site and 47 units on the 327 Harbor Site, in comparison to the 2,715 net population increase associated with the proposed project (City of Los Angeles 2021b). Population growth under Alternative 3 would represent approximately 0.2 percent of the anticipated population growth in the city, based on SCAG's 2045 population forecast (SCAG 2020). Alternative 3 would include 45,000 sf of commercial retail uses and 61,500 sf of Neighborhood Serving Uses, which would result in approximately 267 new employees on the project site (assuming the same types of commercial retail uses as the proposed project), whereas the proposed project would generate approximately 314 employees. The project site is an infill site in an urban area served by existing roadways and infrastructure. Similar to the proposed project, Alternative 3 would not result in new roads or the extension of utilities into previously undeveloped areas and therefore would not result in indirect population growth. As such, Alternative 3 would not result in substantial unplanned direct or indirect population growth, and impacts would be similar to the proposed project.

Similar to the proposed project, construction of Alternative 3 would occur in phases to minimize resident relocation to the extent feasible. Relocated residents would be offered a choice of housing including a rehabilitated or newly constructed on-site unit, a tenant-based housing choice voucher, or a public housing unit at another HACLA community. Similar to the proposed project, the 47 residential units on the 327 Harbor Site would provide replacement housing for some of the current residents on the OSP Specific Plan Site, if residents elect to relocate to the 327 Harbor Site. Although residents would be required to move out of their existing units during the course of construction, all current residents in good standing would have the option to move into a new or rehabilitated unit at

either the 327 Harbor Site or the OSP Specific Plan Site, and no permanent off-site relocation would be required unless a resident selects that as their preferred option. Therefore, the proposed project would not displace substantial numbers of existing housing or persons, requiring construction of housing off site, and impacts would be less than significant. Alternative 3 would result in similar impacts to the proposed project.

k. Public Services

Fire Protection

Construction

The types of construction activities required for Alternative 3 would be similar to the proposed project, although the total length of construction would be slightly reduced compared to the proposed project. As with the proposed project, construction of Alternative 3 would comply with all State and local regulations concerning fire prevention. Construction activities would generate traffic associated with the movement of construction equipment, the transport of soil and construction materials to and from the project site, and construction worker traffic. However, similar to the proposed project, Alternative 3 would implement PDF T-1 to ensure adequate and safe access to the project site remains available for emergency responders during construction activities. Furthermore, pursuant to the California Vehicle Code Section 21806, the drivers of emergency vehicles can avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, construction of Alternative 3 would not result in the need for new or altered fire station facilities, and impacts associated with fire protection would be less than significant. Due to the shorter construction timeline, Alternative 3 would result in reduced impacts in comparison to the proposed project.

Operation

Alternative 3 would generate a smaller population increase than would occur with implementation of the proposed project. In addition, Alternative 3 would reduce the floor area of Neighborhood Serving Uses and the number of associated employees. This reduction in population and building area would reduce the demand for fire services compared to the proposed project. Similar to the proposed project, Alternative 3 would implement all applicable City Building and Fire Code regulations regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, and life safety features. Alternative 3 would undergo LAFD review to ensure compliance with City regulations. This review process would ensure Alternative 3 would minimize the demand for fire protection and emergency medical services. Furthermore, as with the proposed project, traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the project site as emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As with the proposed project, LADWP would be able to supply sufficient fire flow and pressure needed for fire suppression for Alternative 3. As such, Alternative 3 would not necessitate the construction of new or altered fire station facilities, and impacts associated with fire protection would be less than significant. Due to the reduction in population growth and total floor area, Alternative 3 would result in reduced impacts in comparison to the proposed project.

Police Protection

Construction

The types of construction activities required for Alternative 3 would be similar to the proposed project, although the total length of construction would be slightly reduced compared to the proposed project. Construction activities would not generate a permanent population on the project site that would necessitate a substantial increase in police services in San Pedro. However, construction sites can invite theft and vandalism and thereby become sources of nuisance and hazard. As with the proposed project, Alternative 3 would incorporate PDF POL-1 to implement temporary security measures during construction and provide regular security patrols during non-construction hours, which would serve to reduce demand for LAPD services.

Both the proposed project and Alternative 3 would implement PDF T-1 to ensure continued provision of emergency access during construction. Furthermore, pursuant to the California Vehicle Code Section 21806, the drivers of emergency vehicles can avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, construction of Alternative 3 would not result in the need for new or altered police station facilities, and impacts associated with police protection would be less than significant. Due to the shorter construction timeline, Alternative 3 would result in reduced impacts in comparison to the proposed project.

Operation

Alternative 3 would generate a smaller population increase than would occur with implementation of the proposed project. In addition, Alternative 3 would reduce the floor area of Neighborhood Serving Uses and the number of associated employees. Therefore, the demand for services from LAPD would be reduced compared to the proposed project due to fewer people on the project site. Similar to the proposed project, Alternative 3 would incorporate crime prevention measures into the project's design as well as implement comprehensive safety and security measures as part of implementation of PDF POL-2 and PDF POL-3. These features would assist to offset the increase in demand for police protection services generated by Alternative 3. As such, Alternative 3 would not necessitate the construction of new or altered police station facilities, and impacts associated with police protection would be less than significant. Due to the reduction in population growth and the number of employees on the project site, Alternative 3 would result in reduced impacts in comparison to the proposed project.

Schools

Construction

Similar to the proposed project, Alternative 3 would create temporary jobs associated with construction. However, due to the employment patterns of construction workers in southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households. As such, construction of Alternative 3 would not result in the need for new or altered school facilities, and impacts associated with schools would be less than significant, similar to the proposed project.

Operation

Alternative 3 would result in a net increase of 776 residential units and approximately 267 employees. As shown in Table 6-6, Alternative 3 would result in approximately 325 new students (28 percent

fewer than the proposed project). Similar to the proposed project, the project Applicant would be required to pay development fees to LAUSD prior to the issuance of a building permit. As discussed in Section 4.11, *Public Services*, LAUSD collects development fees for new construction within its district boundaries. Pursuant to Government Code Section 65995(h), the payment of these fees fully mitigates all project-related school impacts. Payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at the schools serving the project site. As such, Alternative 3 would not necessitate the construction of new or altered school facilities, and impacts associated with schools would be less than significant. Due to the reduced student generation, Alternative 3 would result in reduced impacts on schools than the proposed project.

Table 6-6 Estimated Net Number of Students Generated by Alternative 3

			Students Generated[1]			
Land use	**Unit**	**Student Generation Factor[1]**	**Elementary (K-6)**	**Middle School (7-8)**	**High School (9-12)**	**Total**
Residential	776 du	0.3711 students/du	152	42	84	278
Commercial Retail and Neighborhood Serving Uses[2]	267 employees	0.1724 students/employee	26	7	14	47
Total Alternative 3 Student Generation			**178**	**49**	**98**	**325**
Proposed Project Student Generation			**249**	**68**	**136**	**453**
Percentage Reduction			**28.5%**	**27.9%**	**27.9%**	**28.3%**

du = dwelling unit

[1] The generation rates of 0.1953 (elementary school), 0.0538 (middle school), and 0.1071 (high school) was applied for residential uses.

[2] Since the LAUSD School Fee Justification Study does not specify which grade levels students are in for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the project residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school).

Libraries

Construction

Similar to the proposed project, due to the employment patterns of construction workers in southern California and the market for construction labor, construction workers are not likely to relocate their households. Construction workers would not contribute to a notable increase in an overall corresponding demand for library services in the vicinity of the project site because it is reasonable to assume that construction workers would visit libraries near their homes. Any increase in usage of libraries by construction workers under Alternative 3 would be negligible. As such, construction of Alternative 3 would not result in the need for new or altered library facilities, and impacts associated with libraries would be less than significant, similar to the proposed project.

Operation

Alternative 3 would result in a population increase of approximately 1,878 persons, which would increase the service population of the San Pedro Regional Branch Library by approximately 2.3 percent. This increase would be less than the demand of the proposed project, which was identified to be negligible. Similar to the proposed project, Alternative 3 would include PDF LIB-1 and would

include Neighborhood Serving Uses such as community rooms, which would offset library demand. Furthermore, Alternative 3 would generate revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing for the library serving the project site and vicinity, as deemed appropriate. Under Alternative 3, revenue for the General Fund would help offset the project-related increase in demand for library services. As such, Alternative 3 would not necessitate the construction of new or altered library facilities, and impacts associated with libraries would be less than significant. Due to the reduced population growth, impacts under Alternative 3 would be reduced compared to the proposed project.

l. Recreation

Construction

Similar to the proposed project, due to the employment patterns of construction workers in southern California and the market for construction labor, construction workers are not likely to relocate their households. Given the temporary nature of construction activities and employment patterns of construction workers in the region where construction workers are engaged in a variety of projects of varying lengths and locations, construction of the proposed project would not be anticipated to introduce a permanent new population to the project area that could result in an increase in the use of existing parks and recreational facilities. As such, construction of Alternative 3 would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities, and impacts associated with recreation would be less than significant, similar to the proposed project.

Operation

Alternative 3 would generate 1,878 new residents, as compared to the 2,715 new residents that would be generated by the proposed project. As a result, the overall increased use of parks and recreational facilities would be reduced compared to the proposed project. Similar to the proposed project, Alternative 3 would include a minimum of 50 sf of private open space per residence, for a total of 60,350 sf of private open space. Common open space under Alternative 3 would include courtyards and outdoor resident amenities totaling 138,980 sf. Publicly accessible open space provided under Alternative 3 would total approximately two acres and would include the Harbor Plaza Park and refurbishment of the existing sports field at 2nd Street and Centre Street. Alternative 3 would also comply with the usable open space requirements established in LAMC Section 12.21 G, with minor modifications as proposed by the OSP Specific Plan, resulting in 279,330 sf of usable open space on the site. As such, Alternative 3 would not necessitate the construction of new or altered parks or recreational facilities beyond those described as part of Alternative 3, and impacts associated with recreation would be less than significant. Due to the reduction in population growth, Alternative 3 would result in reduced impacts in comparison to the proposed project.

m. Transportation

Conflict with Plans, Policies, and Programs

The plans, policies, and programs applicable to the proposed project would also apply to Alternative 3. Under Alternative 3, the primary movement of vehicles would be along Santa Cruz Street, 3rd Street, Centre Street, and Harbor Boulevard, similar to the proposed project. The OSP Specific Plan Site would continue to be served by existing bicycle lanes on Harbor Boulevard and

Pacific Avenue, and new bicycle lanes would be added along Centre Street, Mesa Street, Palos Verdes Street, 2nd Street, and Santa Cruz Street, similar to the proposed project. Alternative 3 would provide sidewalks along all roadways; however, the enhanced walking trail proposed along 1st Street, 2nd Street, and the Palos Verdes Linear Park would not be included in Alternative 3, which would result in less pedestrian amenities compared to the proposed project. Under Alternative 3, public transit improvements would be consistent with the proposed project, and the same roadway modifications would be implemented as the proposed project, except for the additional diagonal parking on Centre Street between Santa Cruz Street and 2nd Street. As such, Alternative 3 would implement similar transportation development, which would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would less than significant impact related to compatibility with circulation system plans. Due to the reductions in the enhanced walking trails, under Alternative 3, impacts would be greater than the proposed project.

Vehicle Miles Traveled

Alternative 3 would result in a lower daily VMT in comparison to the proposed project because Alternative 3 would feature fewer residential units and Neighborhood Serving Uses than the proposed project, which would reduce associated vehicle trips. Based on the City of Los Angeles VMT Calculator Version 1.3, the per capita VMT under Alternative 3 would be 6.6, consistent with the proposed project (City of Los Angeles 2020). The per capita VMT under Alternative 3 would be below the threshold of 6.7, and impacts would be less than significant, similar to the proposed project.

Design Hazards

Under Alternative 3, alterations to the existing roadways, including new bicycle lanes, traffic calming features, enhanced crosswalks, new signals, and the vacation of a portion of 2nd Street would occur, similar to the proposed project. Under Alternative 3, project site access locations would be designed in accordance with City standards to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls. The proposed driveways under Alternative 3 would be designed to provide adequate views of the adjacent bicycle facilities, and vehicle volumes would be spread across all proposed driveways so they would not be concentrated at one location. Alternative 3 would result in less than significant impacts related to geometric design hazards, similar to the proposed project.

Alternative 3 would result in reduced daily trips compared to the proposed project. The proposed project would result in less than significant impacts to freeway safety and off-ramp queuing. Therefore, Alternative 3 would similarly result in less than significant impacts to freeway safety and off-ramp queuing, and impacts would be reduced compared to the proposed project.

Emergency Access

The project site is located in an established urban area that is well served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles. Emergency access to the project site and surroundings is currently provided by Santa Cruz Street, Palos Verdes Street, Beacon Street, Harbor Boulevard, 1st Street, 2nd Street, 3rd Street, Mesa Street, Centre Street, and O'Farrell Street. As with the proposed project, Alternative 3 would include PDF T-1, which would ensure that adequate emergency access to the project site and surroundings is maintained throughout construction. Alternative 3 would provide for LAFD emergency access using fire apparatus access roads in accordance with applicable requirements in LAMC Section 57.503. Similar to the proposed project, transportation and access components would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including the provision of adequate

emergency vehicle access. Compliance with City requirements would be confirmed as part of the LAFD fire/life safety plan review and inspection for new projects, as set forth in LAMC Section 57.118. Adherence to City policies would ensure Alternative 3 would not result in inadequate emergency access. Therefore, Alternative 3 would result in less than significant impacts to emergency access and impacts would be similar to the proposed project.

n. Trial Cultural Resources

Alternative 3 would result in less ground-disturbing activities at the OSP Specific Plan Site during construction than the proposed project; therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced compared to the proposed project. Alternative 3 would implement Mitigation Measures TCR-1 through TCR-5, as well as Mitigation Measures CUL-3 through CUL-6, which would require monitoring for tribal cultural resources during ground-disturbing construction activities, continued consultation with local Native Americans if resources of Native American origin are unearthed during construction, and procedures for the proper treatment of tribal cultural resources. As such, Alternative 3 would result in a less than significant impact to tribal cultural resources with implementation of mitigation. Due to the reduced ground-disturbing activities, Alternative 3 would result in reduced impacts in comparison to the proposed project.

o. Utilities

Water

Construction

Construction activities associated with Alternative 3 would generate a short-term demand for water for dust control. Specifically, on the OSP Specific Plan, a total of 426 days of construction would require dust suppression, resulting in approximately 2,950,170 gallons of water use over the approximately 11-year construction period, or an average of 268,197 gallons of water per year (SCAQMD 2017). At the 327 Harbor Site, there would be approximately 27 days of construction requiring dust suppression, resulting in approximately 15,149 gallons of water use during construction (SCAQMD 2017). However, this demand would be less than the proposed project as Alternative 3 would require less demolition and grading activities than the proposed project. Furthermore, a reduction in the amount of floor area proposed by Alternative 3 as compared to the proposed project would reduce the overall construction period and the total number of days of construction-related water demand. Accordingly, because the water demand for construction of the proposed project would be less than significant, the temporary and intermittent demand for water supplies during construction of Alternative 3 would also be less than significant. Similar to the proposed project, Alternative 3 would construct necessary on-site water infrastructure at the project site in compliance with applicable City requirements to accommodate the proposed new buildings. The potential environmental effects associated with new water infrastructure under Alternative 3 are analyzed throughout this section, concurrently with this alternative as a whole. As such, under Alternative 3, impacts to water infrastructure during construction would be less than significant. Due to the reduced water demand during construction, Alternative 3 would result in reduced impacts in comparison to the proposed project.

Operation

Alternative 3 would generate an increased demand for water compared to existing conditions. Based on the reduction in total development as compared to the proposed project, water demand for Alternative 3 would be less than the proposed project's estimated water demand. Therefore, as with the proposed project, under Alternative 3, estimated water demand would similarly be met by the available water supplies projected by LADWP in normal, single-dry, and multiple-dry years through the year 2040. As such, impacts on water supply during operation of Alternative 3 would be less than significant. Due to the reduced water demand during operation, Alternative 3 would result in reduced impacts in comparison to the proposed project.

Wastewater

Construction

Similar to the proposed project, construction of Alternative 3 would involve the installation of new or relocated sewer connections at the project site. These activities would be confined to trenching to place the sewer lines below surface and would be limited to on- and off-site work associated with on-site sewer lines and off-site sewer connections to intersect with existing off-site mains/lines with adequate capacity to accommodate the increased wastewater from the project site. Given that wastewater flows generated by Alternative 3 would be less than the estimated wastewater flows of the proposed project, which may be able to be accommodated by existing sewer lines according to the LASAN, it is possible there would be sufficient capacity within existing sewer lines to serve wastewater flows generated by Alternative 3. However, detailed gauging and evaluation would be required as part of the permit process to identify specific sewer connection points. All related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN standards. The potential environmental effects associated with new wastewater infrastructure under Alternative 3 are analyzed throughout this section, concurrently with Alternative 3 as a whole. As such, under Alternative 3, construction-related impacts to wastewater would be less than significant, and impacts would be reduced compared to the proposed project.

Operation

Operation of Alternative 3 would generate a net increase in wastewater flows from the project site. However, based on the reduction in total floor area and reduction in population growth in comparison to the proposed project, operational wastewater generated by Alternative 3 would be less than the proposed project. Wastewater generated during operation of the proposed project would be able to be accommodated by the existing capacity of the Terminal Island Water Reclamation Plant. As the operational wastewater generation under Alternative 3 would be less than the proposed project, the existing capacity of the Terminal Island Waste Reclamation Plant would also be adequate to serve Alternative 3. Impacts related to wastewater generation and infrastructure capacity would be less than significant under Alternative 3. Due to the reduced wastewater flows, Alternative 3 would result in reduced impacts in comparison to the proposed project.

Solid Waste

Construction

Alternative 3 would result in approximately half the demolition and grading of the proposed project. Therefore, solid waste generated during construction of Alternative 3 would be reduced

approximately 50 percent compared to the proposed project. Specifically, demolition under Alternative 3 would generate approximately 7,743 cubic yards of demolished materials, and grading activities would result in approximately 158,496 cubic yards of soil export. Similar to the project, construction debris generated by Alternative 3 would be subject to the LAMC Section 66.32, which would ensure at least 75 percent of the nonhazardous construction waste generated by future development would be diverted from landfills serving Los Angeles. Similar to the proposed project, construction waste generated by Alternative 3 would represent a less than one percent of the waste disposal capacity in the region. As such, construction of Alternative 3 would not create a need for additional solid waste disposal facilities to adequately handle construction-generated waste. Construction of Alternative 3 would result in a less than significant impact related to solid waste. Due to the reduced construction waste, Alternative 3 would result in reduced impacts in comparison to the proposed project.

Operation

As shown in Table 6-7, operation of Alternative 3 is estimated to generate approximately 30 percent less solid waste than the proposed project. Existing landfills serving the city have a total remaining daily capacity of 25,640 tons per day. Therefore, the solid waste generated by operation of Alternative 3 would not require additional solid waste infrastructure. As such, operation of Alternative 3 would result in a less than significant impact related to solid waste. Due to the reduction in estimated solid waste, Alternative 3 would result in reduced impacts compared to the proposed project.

Table 6-7 Alternative 3 Estimated Net Daily Solid Waste Generation

Land Use	Alternative 3	Solid Waste Generation Rate	Daily Total	Annual Total
New Residential	776 du	12.23 lbs/du/day	9,490 lbs (4.75 tons)	3,464,025 lbs (1,732 tons)
Commercial Retail	45,000	5 lbs/1,000 sf/day	225 lbs (0.10 ton)	82,125 lbs (37 tons)
Neighborhood Serving Uses	61,500	5 lbs/1,000 sf/day	308 lbs (0.15 tons)	112,420 lbs (56 tons)
Total			**10,023 lbs (5.0 tons)**	**3,658,570 lbs (1,829.3 tons)**
Proposed Project Solid Waste Generation			14,372 lbs (7.2 tons)	5,245,780 lbs (2,622.9 tons)
Percentage Reduction from the Proposed Project				**30%**

lbs = pounds; du = dwelling units; sf = square feet

Electric Power, Natural Gas, and Telecommunications Infrastructure

Construction

Construction-related activities of Alternative 3 would not involve consumption of natural gas or result in impacts to telecommunication services. Minor quantities of electric power for lighting, power tools, and other support equipment would be required; however, energy consumed during construction of Alternative 3 would be finite and limited, and would not result in the need for relocation or construction of new or expanded electric power facilities. Existing electric power, natural gas, and

telecommunications infrastructure are available to serve the proposed project, and therefore would be available to serve Alternative 3. Because Alternative 3 would require a shorter construction period due to the reduced development in comparison to the proposed project, the overall amount of electricity required during construction would be reduced. As such, under Alternative 3, impacts to electric power, natural gas, and telecommunications infrastructure would be less than significant, and would be reduced in comparison to the impacts generated by the proposed project.

Operation

Due to the reduction in development, under Alternative 3, overall demand for electric power, natural gas, and telecommunications infrastructure would be reduced in comparison to the proposed project. Specifically, Alternative 3 would demand 11,547,559 kilowatt-hours of electricity and 2,651,240 cf of natural gas per year (Appendix B). The proposed project would result in less than significant impacts to electric power, natural gas, and telecommunications facilities. Given the reduced development in comparison to the proposed project, Alternative 3 similarly would not require the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, and impacts would be less than significant. Due to the reduced demand for electric power, natural gas, and telecommunications, Alternative 3 would result in reduced impacts compared to the proposed project.

6.6.3 Comparison of Impacts

Alternative 3 would reduce impacts to historical resources in comparison to the proposed project but would still result in significant and unavoidable impacts due to the partial demolition of the Rancho San Pedro Complex. Alternative 3 would result in similar significant and unavoidable impacts related to construction noise, construction vibration, and operational noise as the proposed project, although construction impacts would be reduced due to the shorter construction period. The significance of impacts associated with the remaining environmental issues would be similar to or less than those of the proposed project, except for consistency with transportation plans and policies.

6.6.4 Relationship of the Alternative to Project Objectives

With a similar mix of uses and development, Alternative 3 would meet the underlying purpose of the proposed project to revitalize the project site through the transformation of the community into a mixed-income, mixed-use neighborhood for current and future residents. Alternative 3 would also fully or partially meet the majority of the project objectives, as described below.

Alternative 3 would fully meet the following project objectives:

- Implement the policies of the City of Los Angeles General Plan Framework Element, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the San Pedro Community Plan that encourage growth in urban infill areas to improve mobility options, enhance pedestrian opportunities, and reduce auto dependence.
    - Alternative 3 would increase growth on the infill project site and would include a mix of residential, commercial/retail, and Neighborhood Serving Uses. Active transportation and public transit improvements would also be implemented, similar to those included in the proposed project. Therefore, this alternative would improve mobility options, enhance pedestrian opportunities, and reduce residents' dependency on automobiles, consistent with this objective.

- Ensure existing tenants' first right to re-occupy units appropriate to household size through phasing of development and providing a mix of low- and moderate-income units.
  - This alternative would minimize displacement of the existing tenants by giving them first right to re-occupy their units after construction is completed. In addition, this alternative would include a mix of low- and moderate-income units. Therefore, Alternative 3 would meet this objective, though not to the same extent as the proposed project because fewer new units would be constructed.

- Implement green design practices to ensure environmental sustainability, including, but not limited to, energy and water efficiency.
  - Similar to the proposed project, new buildings developed under Alternative 3 would be designed to achieve LEED® Gold, Greenpoint, or similar rating system, and would incorporate a variety of energy and water efficiency measures. Rehabilitated buildings on the OSP Specific Plan Site would also receive energy and water efficiency upgrades to the extent feasible. While preservation of some of the existing buildings on the OSP Specific Plan Site would reduce construction waste and materials consumption, the long-term, operational sustainability of the structures on the preserved buildings on the OSP Specific Plan Site would be reduced in comparison to the proposed project. Therefore, Alternative 3 would meet this objective, though not to the same extent as the proposed project because a portion of the existing buildings would remain.

Alternative 3 would partially meet the following objectives:

- Provide a substantial increase in the number of affordable housing units, consistent with the goals of HACLA's 25-Year Vision Plan, the San Pedro Neighborhood Transformation Plan, and the City's Housing Element to expand the supply of affordable housing units in Los Angeles.
  - The number of affordable housing units at the OSP Specific Plan Site would be increased but Alternative 3 would provide only half of the additional affordable housing units of the proposed project. This alternative also would not fully align with the goals of the One San Pedro Neighborhood Transformation Plan, which outlines a goal to create a "One San Pedro," a cohesive, mixed-used, mixed-income community with at least 1,390 residential units. Rehabilitated buildings would not be consistent with the new buildings constructed on the OSP Specific Plan Site and fewer than 1,300 residential units would be present following construction. Therefore, this objective would only be partially met.

- Replace existing affordable housing units on the OSP Specific Plan Site with code-compliant affordable and moderate housing units in a variety of sizes and configurations to allow for a mix of household sizes, enhanced security and accessibility, and long-term useful life of buildings to minimize the future need for substantial repairs or replacement of the affordable housing.
  - Alternative 3 would replace approximately 41 percent of the existing units on the OSP Specific Plan Site with new, code-compliant affordable and moderate housing units in a mix of sizes and configurations. The redeveloped portions of the site would also feature improved ADA accessibility and security and would be constructed with durable materials to ensure the long-term useful life of the buildings. Approximately 59 percent of the existing units on the OSP Specific Plan Site would be retained and would be modernized to meet the applicable codes to the extent feasible but the objectives related to fully replacing the existing units, providing a mix of housing types and sizes, improving ADA accessibility, and ensuring longevity of the housing would not be fully met, as compared to the proposed project.

- Improve the housing stock in the community by demolishing existing buildings which contain lead and asbestos.
  - Alternative 3 would demolish some of the existing buildings on the project site and rehabilitate others, thereby improving the housing stock and partially meeting the intent of this objective. However, some of the existing buildings would remain, and this objective would not be fully met to the same extent as the proposed project.
- Create a mixed-use, mixed-income community that includes a mix of dwelling unit types and sizes, affordability levels, local-serving retail, community services, and active and passive open/green space.
  - Alternative 3 would include a mix of affordable and market-rate units on the OSP Specific Plan Site, along with commercial retail, community services, and open space amenities. However, there would be a reduction in the community services and open space amenities as compared to the proposed project. Therefore, this objective would only be partially met.
- Create new recreation and park facilities that meet the needs and enhance safety of the future residents at the project site and the broader community.
  - Alternative 3 would include Harbor Plaza and would rehabilitate the existing field on the OSP Specific Plan Site. However, there would be a reduction of 3.3 acres of publicly accessible open space and associated park and recreational amenities as compared to the proposed project. Therefore, this objective would only be partially met.
- Incorporate building designs that integrate into the surrounding neighborhoods, take advantage of waterfront views, provide a variety of building types, and integrate new amenities with a focus on developing a healthy and vibrant community.
  - Due to the scale and design differences between the rehabilitated and redeveloped portions of the OSP Specific Plan Site, Alternative 3 would not provide an integrated design. New amenities would be provided but there would be a 28-percent reduction in community amenity space under Alternative 3 compared to the proposed project. Therefore, this objective would only partially be met.

6.7 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates an analysis of alternatives to a project shall identify an environmentally superior alternative based on the alternatives evaluated in an EIR. The environmentally superior alternative is defined as the alternative with the least adverse impacts on the project site and its surrounding environment. Section 15126.6(e)(2) also states if the No Project Alternative is identified as the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

With respect to identifying an environmentally superior alternative among those analyzed in this EIR, the range of feasible alternatives includes Alternative 1, the No Project Alternative; Alternative 2, the Historic Rehabilitation Alternative; and Alternative 3, the Partial Preservation Alternative. Table 6-2 provides a comparative summary of the environmental impacts anticipated for each alternative with the environmental impacts associated with the proposed project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126(c), the analysis below addresses the ability of the alternatives to avoid or substantially lessen one or more of the significant effects of the proposed project.

Of the alternatives analyzed in this EIR/EIS, Alternative 1, the No Project Alternative would avoid all of the proposed project's significant environmental impacts, including the proposed project's significant and unavoidable impacts related to historical resources, construction noise and vibration, and operational noise. Alternative 1 would avoid the proposed project's cumulatively considerable contributions to historical resources and construction noise impacts. However, Alternative 1 would result in increased impacts to transportation compared to the proposed project.

In accordance with the requirements of the CEQA Guidelines to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, Historic Rehabilitation, would be the environmentally superior alternative. Alternative 2 is the only alternative that would both result in new development and eliminate the proposed project's significant and unavoidable impacts to historical resources and operational noise. Alternative 2 would rehabilitate Rancho San Pedro in accordance with the Secretary's Standards and the California Historic Building Code. In addition, Alternative 2 would not include sources of recreational noise at the OSP Specific Plan Site, and therefore, would reduce the proposed project's significant and unavoidable impact related to operational noise. Furthermore, Alternative 2 would reduce most of the proposed project's impacts due to a reduction in development, with the exception of impacts related to temporary construction-related displacement, consistency with transportation policies, and transportation design hazards. Although significant and unavoidable construction noise and vibration impacts would occur under Alternative 2, of the range of alternatives analyzed, Alternative 2, Historic Rehabilitation, would result in the fewest significant and unavoidable impacts and would be the environmentally superior alternative. However, Alternative 2 would only partially achieve the project objectives, and would not meet the underlying purpose of the proposed project or satisfy the project objectives to the same extent as the proposed project.

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