

# CHAPTER 4 Environmental Analysis

## 4.0 INTRODUCTION TO THE ANALYSIS

This chapter contains a discussion of the possible environmental effects of the San Pedro Community Plan and implementing ordinances (proposed plan) for the specific issue areas that were identified through the Initial Study process as having the potential to experience significant impacts. This chapter is the primary component of the EIR, as it provides information on the existing conditions in the San Pedro Community Plan Area (CPA), the type and magnitude of the project's potential individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid such impacts. The existing conditions component of the analysis defines the environmental conditions as they exist in the CPA at the time the Notice of Preparation (NOP) was published, while project impacts are defined as the project's effect on the existing environment. Mitigation measures are designed to reduce a project's potential impact to less-than-significant levels. The purpose of this chapter is to inform readers of the type and magnitude of the project's environmental impacts and how such impacts would affect the existing environment.

### 4.0.1 Comments Received on the Notice of Preparation

During the 30-day public review period for the NOP, which began on January 31, 2008, comment letters were received from public agencies and individuals. Additional comments were also received during the public scoping meeting on February 20, 2008. The NOP and the NOP comments are included in Appendix A (Notice of Preparation and NOP Comments) of this EIR and were considered in the EIR analyses.

### 4.0.2 Scope of the EIR

The environmental analyses are presented in the following order:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils and Mineral Resources
- Greenhouse Gas Emissions
- Safety/Risk of Upset
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Population, Housing, and Employment
- Public Services
- Transportation/Traffic
- Utilities/Service Systems

All impacts associated with agricultural resources have been determined to be “Effects Not Found to Be Significant” according to CEQA Guidelines Section 15128, and are briefly discussed in Chapter 5 (Other CEQA Considerations) of this EIR. Alternatives to the project are discussed in Chapter 6 (Alternatives to the Proposed Plan).

### 4.0.3 Format of the Environmental Analysis

Each environmental topic in Section 4.1 through Section 4.15 of the EIR presents a program-level analysis of the proposed plan’s environmental impacts on the environment. Each section includes an introduction, a description of the environmental setting, the regulatory framework, program-level impacts and proposed mitigation measures, and cumulative impacts. The organization of each of the technical sections follows the outline below:

#### ■ Introduction

The Introduction provides a brief description of the types of impacts that are analyzed in the section. For sections that are lengthy or analytically complex, an introductory overview of the format and structure of the section is presented.

#### ■ Environmental Setting and Regulatory Framework

The assessment of each issue area begins with a discussion of the existing conditions (or setting), as well as a discussion of the regulatory framework relevant to that issue area. As set forth in CEQA Guidelines Section 15125(a) the discussion describes the physical environmental conditions in the CPA at the time the environmental analysis commenced. It constitutes the baseline physical conditions by which the City of Los Angeles will determine whether adoption of the San Pedro Community Plan and implementing ordinances would result in a significant environmental impact.

As required by the CEQA Guidelines, this document discusses any inconsistencies between the proposed plan, which proposes to update one of the thirty-five Community Plans that comprise the Land Use Element, and applicable City of Los Angeles General Plan policies and regional plans. However, consistent with the scope and purpose of this document, the discussion primarily focuses on those requirements adopted for the purpose of avoiding or mitigating an environmental effect and an assessment of whether any inconsistency with these standards creates a significant physical impact on the environment. The ultimate determination of whether the proposed plan is consistent with the City’s General Plan is a decision that resides exclusively with the decision-making body (i.e., the Planning Commission or City Council), not with this environmental document.

#### ■ Project Impacts and Mitigation

The impacts and mitigation discussion is divided into the following subsections, as described below.

##### *Thresholds of Significance*

The impact significance criteria used in this EIR are based on L.A. CEQA Thresholds Guide (2006) regarding the environmental effects to be considered significant. This guidance is, in turn, based upon

CEQA Guidelines Appendix G, with some modifications. The significance criteria used for each environmental topic/resource are presented at the beginning of the impact discussion in each section of Chapter 4 of this EIR.

### ***Analytic Method***

This subsection identifies the methodology used to analyze potential environmental impacts for each environmental topic under the identified significance criteria. Some evaluations (such as for air quality, traffic, and noise) are quantitative, while others, such as for visual quality and urban design, are qualitative.

### ***Impacts and Mitigation Measures***

This subsection describes the potential direct and/or indirect environmental impacts of the proposed plan and, based on the significance criteria, determines the significance of each environmental impact. Each impact is summarized in an “impact statement” that is separately numbered, coincides with an identified significance criterion, and is followed by a detailed discussion. The impact statement also identifies the level of significance after implementation of all feasible mitigation measures. This format is designed to assist the reader in quickly identifying the subject and conclusion of the impact analyses.

CEQA does not treat project consequences relating solely to land use, socioeconomic, or population, employment, or housing issues as direct physical impacts to the environment. This chapter, therefore, presents land use and demographics as informational sections that provide the setting for land use and population-related changes that could occur under the proposed plan. To the extent that land use and population-related changes resulting from the proposed plan could result in physical environmental effects, those effects are addressed in the appropriate sections in this chapter.

This document focuses on the overall effects of the proposed plan within the City; the EIR does not examine the effects of the potential site-specific projects that may occur in the future under the proposed plan. The nature of community plans is such that many proposed policies are intended to be general, with details to be determined during implementation. Therefore, this EIR assumes that specific development projects and infrastructure improvement proposals submitted to the City of Los Angeles for San Pedro will necessitate an independent environmental assessment consistent with the requirements of CEQA. Thus, many of the impacts and mitigation measures can only be described in this EIR in general or qualitative terms.

The proposed plan includes policies and programs, which in concert with implementing ordinances, are designed to reduce environmental impacts. This EIR shows how the impacts of future development in San Pedro will be mitigated through compliance with existing regulations and implementation of the policies and programs of the proposed plan. Any residual impact after implementation of these proposed policies and programs is measured against the significance criteria established for each impact area. Depending on the issue area, the significance criteria are identifiable quantitative, qualitative, or performance thresholds beyond which the proposed plan would be considered to result in a significant effect.

This EIR represents the best effort to evaluate the potential environmental effects of the proposed plan given its long-term planning horizon. It can be anticipated that conditions will change over this planning horizon; however, the assumptions used are the best available at the time of preparation and reflect existing knowledge of patterns of development and travel patterns.

The EIR is based on the assumption that all policies in the proposed plan will be implemented and all development will be consistent with the proposed plan Land Use Diagram. It is also assumed that during the 19-year lifespan of the plan, the potential for development within San Pedro will not be fully realized. It is assumed that development will occur incrementally through growth management policies that ensure urban growth is balanced with infrastructure improvements and natural resources conservation over the next 20 years. Another key assumption of the plan EIR is that development under the proposed plan will occur over 20 years. It is understood that development under the proposed plan will be incremental and the timing of development will be influenced by market conditions. While the proposed plan includes policies intended to control the degree and location of growth, it does not include developmental phases because phases cannot be predicted with accuracy.

The proposed plan represents a land use plan and implementing ordinances rather than a specific development project. Development-specific construction and operational impacts are not known. Therefore, the impact analysis in this EIR is on a program level; that is, it focuses on indirect environmental impacts that could occur with implementation of the proposed policies rather than on direct physical environmental impacts that would occur with a specific development project. However, impacts that could occur as a result of specific development allowed under the plan must be considered because they would be indirect impacts of implementation of the plan. For example, construction activities could exceed SCAQMD thresholds of significance for air quality, as the South Coast Air Basin, in which the San Pedro CPA exists, is in nonattainment for several criteria pollutants, and construction emissions could result in a significant impact despite implementation of mitigation measures. Because specific development projects are not known at this time, it is uncertain whether a significant impact would actually occur. Therefore, on a program level, impacts of this type would be considered significant and unavoidable even though individual development projects following the plan may or may not exceed significance thresholds.

The geographic scope of the impact analyses varies depending upon the specific environmental issue being analyzed. Where the impact analysis identifies significant adverse environmental effects that could be reduced or avoided through implementation of a mitigation measure, the measure is presented at the end of the impact section. Mitigation measures identify specific and measurable actions that could be taken to reduce potentially significant environmental impacts.

Project impacts are also assessed in light of existing regulatory requirements that could serve to mitigate potential impacts. The effectiveness of existing regulations to mitigate potential impacts is often affected by discretionary requirements, site characteristics, and project features and design-level considerations that are not yet detailed.

The proposed plan is a land use plan and does not identify specific development projects. However, mitigation measures have been identified that will help reduce the impacts from future discretionary development within the San Pedro CPA. In addition, all future development pursuant to the San Pedro

Community Plan and subject to discretionary approval by the City may be required to implement project-specific mitigation measures or standard conditions of approval to reduce specific impacts. Mitigation measures would usually be implemented by individual development applicants, with oversight by one or more public agencies, unless indicated otherwise.

This subsection concludes with a statement regarding whether the impact, after compliance with existing local, state, and federal laws and regulations, would remain significant or be reduced to a less-than-significant level.

## ■ Cumulative Impacts

CEQA requires that EIRs discuss a project's potential contributions to cumulative impacts, in addition to project-specific impacts. CEQA Guidelines Section 15130(a)(1) states that a "cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Other projects include past, present, and reasonably probable future projects.

CEQA Guidelines Section 15130(b)(1) states that the approach to the cumulative impact analysis may be based on either of the following approaches, or a combination thereof:

- A list of past, present, and probable future projects producing related or cumulative impacts
- A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or areawide conditions

For the purposes of this EIR, the analysis of the potential for the project's incremental effects to be cumulatively considerable is based upon a list of related projects identified by the City and neighboring jurisdictions and/or on full implementation of the City's General Plan and/or other planning documents, depending upon the specific impact being analyzed. Table 4-1 (Cumulative Projects) describes the projects that were considered in the cumulative analysis.

The geographic scope of the cumulative impact analyses and the specific related projects that are included in the analyses may also vary depending on the specific environmental issue being analyzed. Each technical section of this EIR designates the cumulative context for each cumulative impact analysis.

The EIR presents a cumulative impact analysis only where the project's incremental effect would result in a less-than-significant or significant and unavoidable cumulative impact.

CEQA requires that an EIR discuss cumulative impacts to determine whether they are significant. If the cumulative impact is significant, the project's incremental effects must be analyzed to determine if the project's contribution to the cumulative impact is cumulatively considerable. In accordance with CEQA Guidelines Section 15065(a)(3), this determination is based on an assessment of the project's incremental effects viewed in combination with the effects of past, present, and probable future related projects. The existence of a currently existing significant cumulative impact does not necessarily mean that the project's contribution to that impact must be significant. Instead, a project's contribution to a significant cumulative impact is significant only if its contribution is cumulatively considerable.

<b>Table 4-1 Cumulative Projects</b>		
<i>Name of Project</i>	<i>Location</i>	<i>Status</i>
Ponte Vista	25900 South Western Avenue (Wilmington-Harbor City)	Under environmental review
Jordan Downs Specific Plan (mixed use development)	Harbor Gateway Community Plan Area Project Address: The area generally bounded by 97 <sup>th</sup> Street to the north, Alameda Street to the east, 103 <sup>rd</sup> Street to the south, and Grape Street to the west	FEIR certified
San Pedro Waterfront Project	POLA	FEIS/FEIR certified 9/29/09
Wilmington Waterfront Project	POLA	FEIS/FEIR certified 6/18/09
Port of Los Angeles Channel Deepening Project	POLA	FEIS/FEIR certified 4/29/09
Berths 97-108 (China Shipping) Container Terminal Project	POLA	FEIS/FEIR certified 12/8/08
Pacific L.A. Marine Terminal LLC Crude Oil terminal	POLA	Final SEIS/SEIR certified 11/20/08
Berths 136–147 (TraPac) Container Terminal Project	POLA	FEIS/FEIR certified 12/6/07
City Dock No. 1 Marine Research Center	POLA	Under environmental review
Al Larson Boat Shop Improvement Project	POLA	Under environmental review
Berths 302–306 (APL) Container Terminal Project	POLA	Under environmental review
Southern California International Gateway Project	POLA	Under environmental review

SOURCE: City of Los Angeles Planning Department; The Port of Los Angeles (2011).

CEQA recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project- level impacts, but instead should “be guided by the standards of practicality and reasonableness” (CEQA Guidelines Section 15130(b)). The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the Project alone.

The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed plan in conjunction with other past, present, and probable future development in areas causing related impacts.

#### 4.0.4 Levels of Significance

A “significant effect” is defined by CEQA Guidelines Section 15382 as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, or ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant.”

The Draft EIR uses the following terms to describe the level of significance of impacts identified during the course of the environmental analysis:

- **No Impact**—Where the project would have no effect whatsoever on the identified resource as established by the threshold of significance, a discussion is included in the subsection of each section entitled “Effects Not Found to Be Significant.”
- **Less-Than-Significant Impact**—Impacts that are adverse, but that do not exceed the specified standards of significance
- **Potentially Significant Impact**—Significant impacts that may ultimately be determined to be less than significant; the level of significance may be reduced in the future through further definition of the project detail; potentially significant impacts may also be impacts about which there is not enough information to draw a final conclusion; however, for the purpose of this EIR, they are considered significant; such impacts are equivalent to significant impacts and require the identification of feasible mitigation measures
- **Significant and Unavoidable Impact**—Impacts that exceed the defined standards of significance and that cannot be eliminated or reduced to a less-than-significant level through the implementation of feasible mitigation measures

