Smoky Hollow Specific Plan Amendment (SPA21-01) and Community Benefit Plans for the Standard Works Project at 1320-1330 E. Franklin Avenue (CBP19-03) and 1475 E. El Segundo Boulevard (CBP19-02)

Initial Study

prepared for

CITY OF EL SEGUNDO
Development Services Dept.
Planning Division
350 Main Street
El Segundo, CA 90245
Contact: Eduardo Schonborn, AICP

prepared with the assistance of

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Public Review Draft
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This report prepared on 50% recycled paper with 50% post-consumer content.

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Exhibits

Appendices

* includes Native American Consultation Documentation

Initial Study

1. Project Title

Smoky Hollow Specific Plan Amendment (SPA21-01) and Community Benefit Plans for the Standard Works Project at 1320-1330 E. Franklin Avenue (CBP19-03) and 1475 E. El Segundo Boulevard (CBP19-02)

2. Lead Agency Name and Address

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4. Project Location

The Standard Works Project ("Project" or "proposed Project") is located within the Smoky Hollow Specific Plan ("SHSP" or "Specific Plan") area, which comprises 120 acres in the southern portion of the City of El Segundo ("City" or "El Segundo"). The SHSP area is situated east of the downtown El Segundo Main Street Corridor and supports a number of well-established commercial, office, and light industrial uses just north of the Chevron Oil refinery (see Exhibit 1, Regional Location).

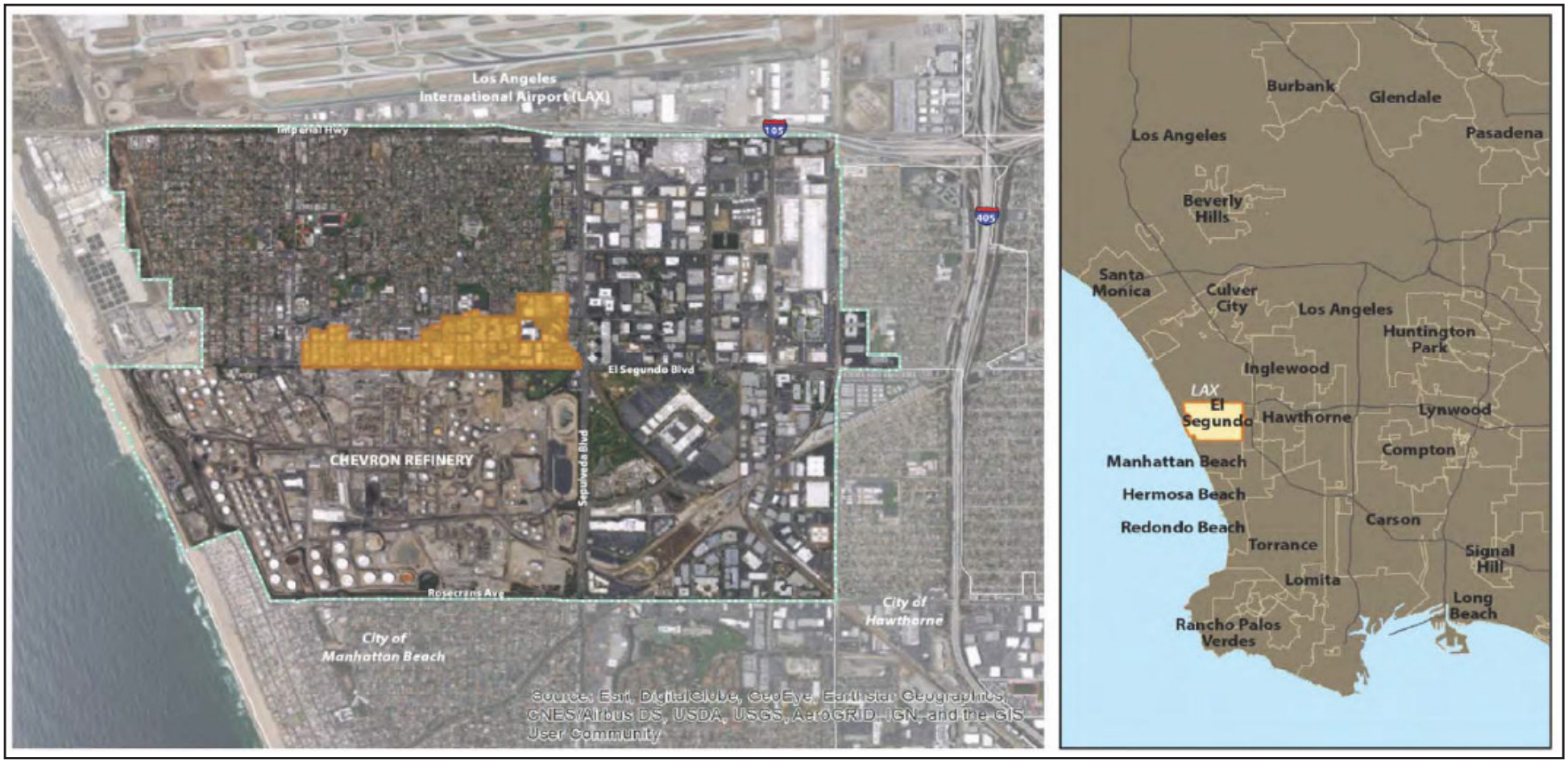
The SHSP area is oriented east-west and is bounded by Indiana Street and Pacific Coast Highway to the east, downtown El Segundo to the west, the Chevron refinery and El Segundo Boulevard to the south, and commercial/industrial neighborhoods generally north of E. Franklin Avenue (see Exhibit 2, Smoky Hollow Specific Plan Area).

The Project, described in more detail in Section 7, consists of (1) the redevelopment of two sites within the SHSP area (the "Development Sites"), as shown in Exhibit 3, Development Sites Location Map; and, (2) a proposed amendment to the SHSP that would affect a Sub-area of the SHSP (the "Specific Plan Amendment Sub-area" or "SPA Sub-area"), as shown in Exhibit 5, SPA Sub-area. The SPA Sub-area is located in the Smoky Hollow East (SH-E) and Public Facility (PF) zoning districts, and is bounded by Center Street to the west, E. Franklin Avenue to the north, Pacific Coast Highway (PCH) [formerly Sepulveda Blvd.] to the east, and E. El Segundo Blvd. the south, as shown in Exhibit 4, SHSP Zoning Districts.

The Development Sites are in the SH-E zoning district and within the proposed SPA Sub-area.

The Development Sites are located north of East El Segundo Boulevard and south of East Franklin Avenue, between Oregon Street and Kansas Street in the City of El Segundo, California, as shown in Exhibit 6, Standard Works Development Project Sites. The Development Sites are rectangular-shaped parcels that are currently occupied by single-story commercial structures and associated asphalt paved parking.

The Development Sites comprise two specific development areas that are proximate to each other; the South Site (also known as Parcel A) and the North Site (also known as Parcel E) as shown in Exhibit 6, Standard Works Development Project Sites. The Development Sites and the SPA Sub-area, taken together, will be referred to as the "Project Site" in this document.



Smoky Hollow Specific Plan Boundary

City of El Segundo City Limits

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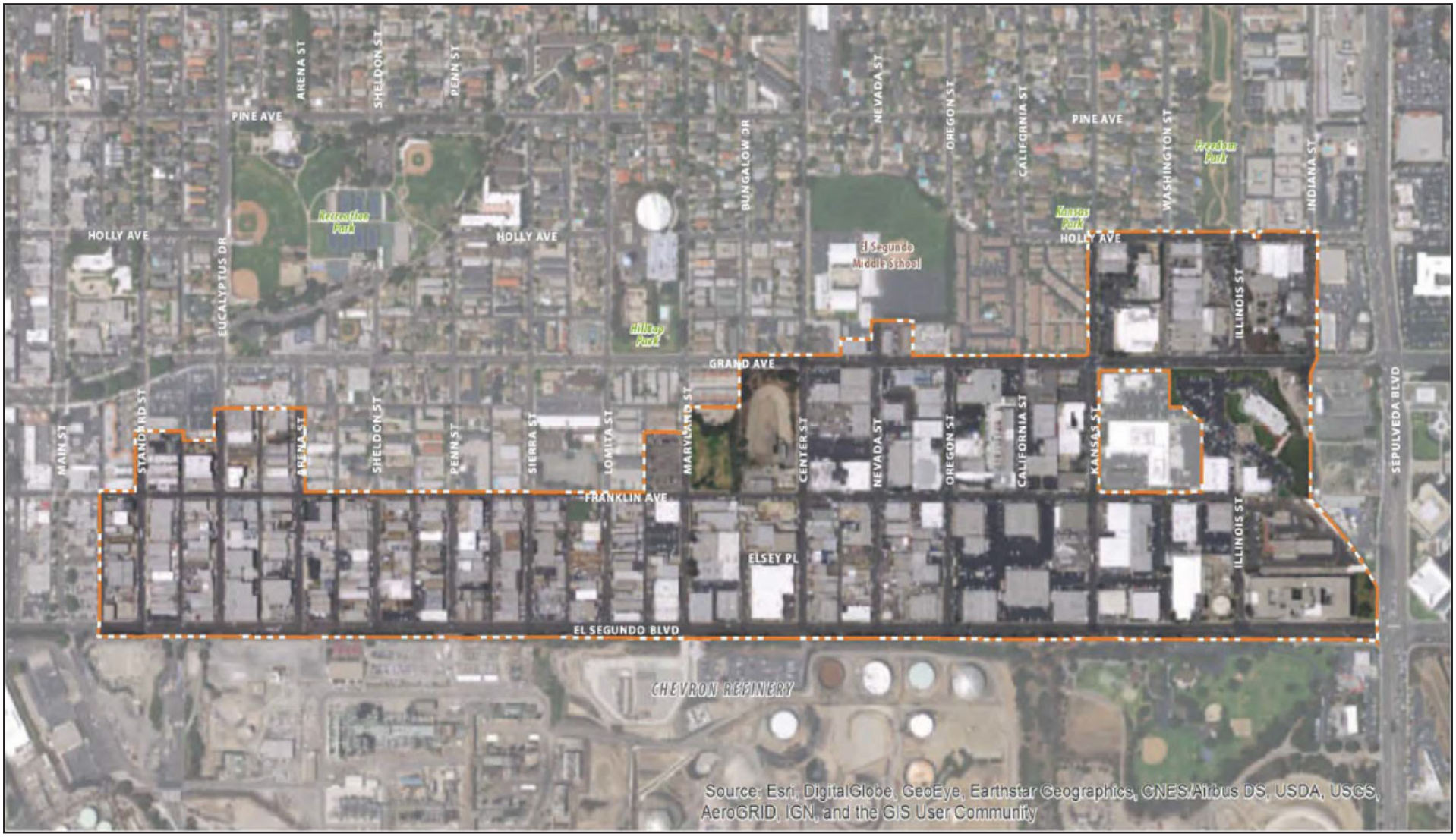
Exhibit 1 Regional Location Map

Standard Works Development Project

City of El Segundo, California



Smoky Hollow Specific Plan Boundary

N

0 250 500 1,000 Feet

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Exhibit 2 Smoky Hollow Specific Plan Area Map

Standard Works Development Project
City of El Segundo, California

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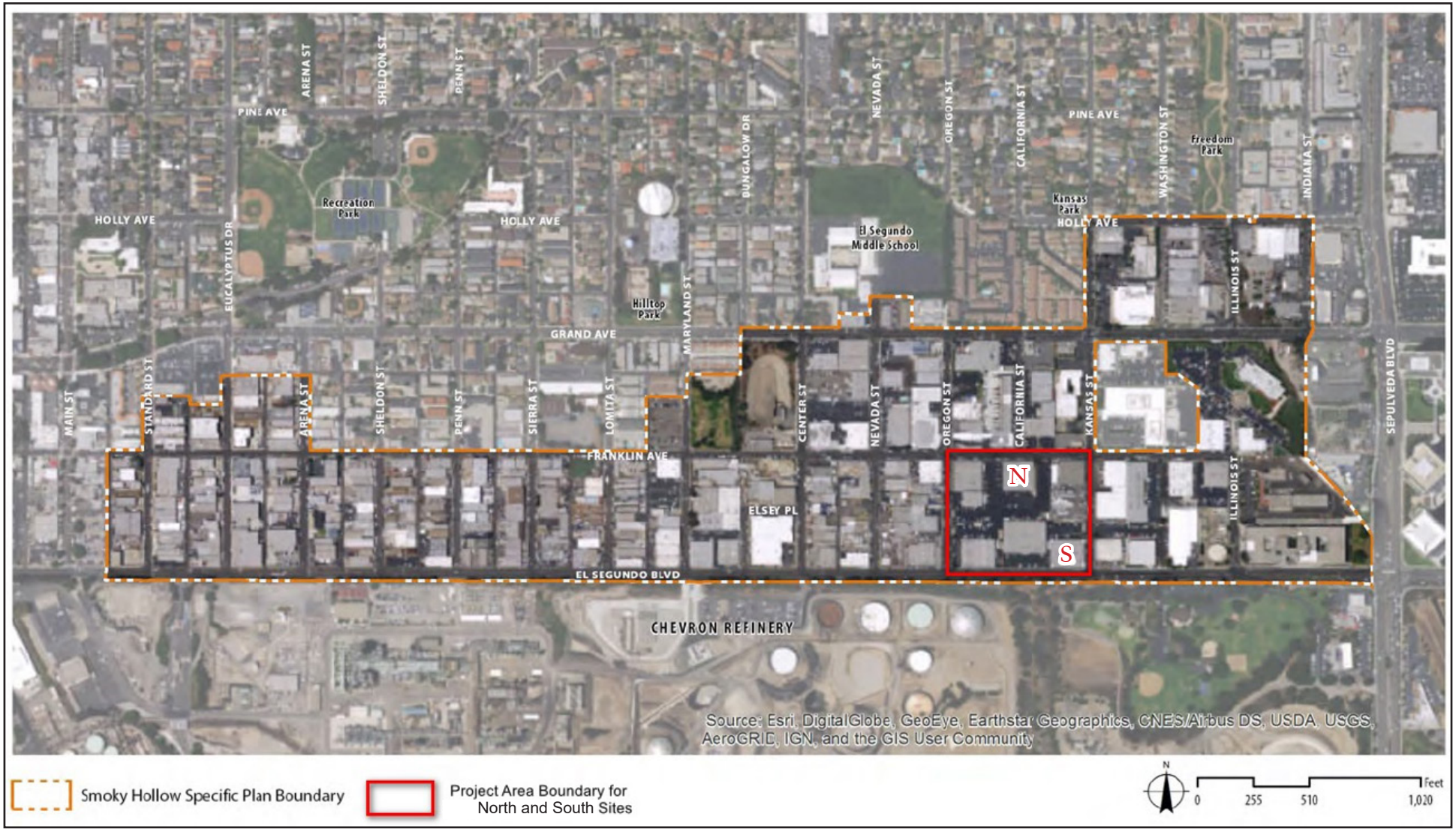

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Exhibit 3 Development Sites Location Map

Standard Works Development Project
City of El Segundo, California

5. General Plan Designation and Zoning

The Project Site has a General Plan land use designation of Smoky Hollow Specific Plan (SHSP). The Development Sites are in the Smoky Hollow East (SH-E) zoning district and the SPA Sub-area includes property in both the SH-E and Public Facility (PF) zoning districts. The SH-E district provides a transitional land use area between higher-intensity office uses east of Sepulveda Boulevard and the smaller, single-parcel industrial and creative businesses of the western portion of the SHSP area. The SH-E zoning district provides for the development of incubator industrial, research, and technological uses; medium-sized light industrial and manufacturing; and creative office uses. The Public Facility (PF) Zoning District is for public land uses necessary to support community needs within the City, including libraries, community facilities, schools, and utilities. Exhibit 4, SHSP Zoning Districts, shows the various zoning districts within the Specific Plan and includes the boundary of the proposed Specific Plan Amendment Area. Exhibit 5, SPA Sub-area, shows the location of the SPA Sub-area covered by the proposed Specific Plan Amendment on an aerial photo base.

6. Project Setting

The Project Site is developed with various commercial and light industrial land uses. The Chevron Oil Refinery is located just south of the SPA Sub-area, the Los Angeles International Airport (LAX) is a mile to the north, and the Pacific Ocean is approximately two miles to the west. The Development Sites, which include the South Site and the North Site, are shown in Exhibit 6, Standard Works Development Project Sites, on an arial photo base.

South Site - 1475 E. El Segundo Blvd. The South Site is an industrial site originally constructed in the 1950's-60's. It includes a single-story brick building of approximately 19,311 square feet used for industrial/warehouse and office uses. The site and the entire surrounding area uses were originally designed as supporting uses for the oil and gas industry (Standard Oil). The entire lot outside of the building is paved with asphalt and used for surface parking. There is a slope across the property down from the northwest to the southeast.

North Site - 1320-1330 E. Franklin Ave. The North Site is an industrial site originally constructed in the 1950's-60's. It includes a single-story brick industrial building of approximately 19,493 square feet used for industrial/warehouse and office uses. The site and the entire surrounding sites were originally designed as supporting uses for the oil and gas industry (Standard Oil). The entire lot outside of the building is paved with asphalt and used for surface parking. There is a recently completed four-story 400-car garage just south of the building. The site is flat with no slope across the property.

7. Surrounding Land Uses

The Project Site is located in an urbanized and industrial environment situated on gently rolling hills. The Chevron Oil refinery, located just south of the SHSP area, is a large industrial facility with towers, reservoirs, an electrical substation, offices, and other facilities typical of a refinery. The area was developed predominantly in the 1950s when manufacturing and refinery-related businesses were established close to the Chevron refinery, the aerospace industry, and transportation opportunities provided by LAX. After a long period of inactivity, new developments and businesses have begun to move into the Specific Plan area. Demand for development has largely come from technology and creative firms, including architecture, real estate, furniture, manufacturing, and digital advertising

firms. Exhibit 7, Surrounding Land Uses, shows the location of the Development Sites on an aerial base and office and light industrial land uses in the surrounding area.

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Exhibit 4 SHSP Zoning Districts

Standard Works Development Project
City of El Segundo, California

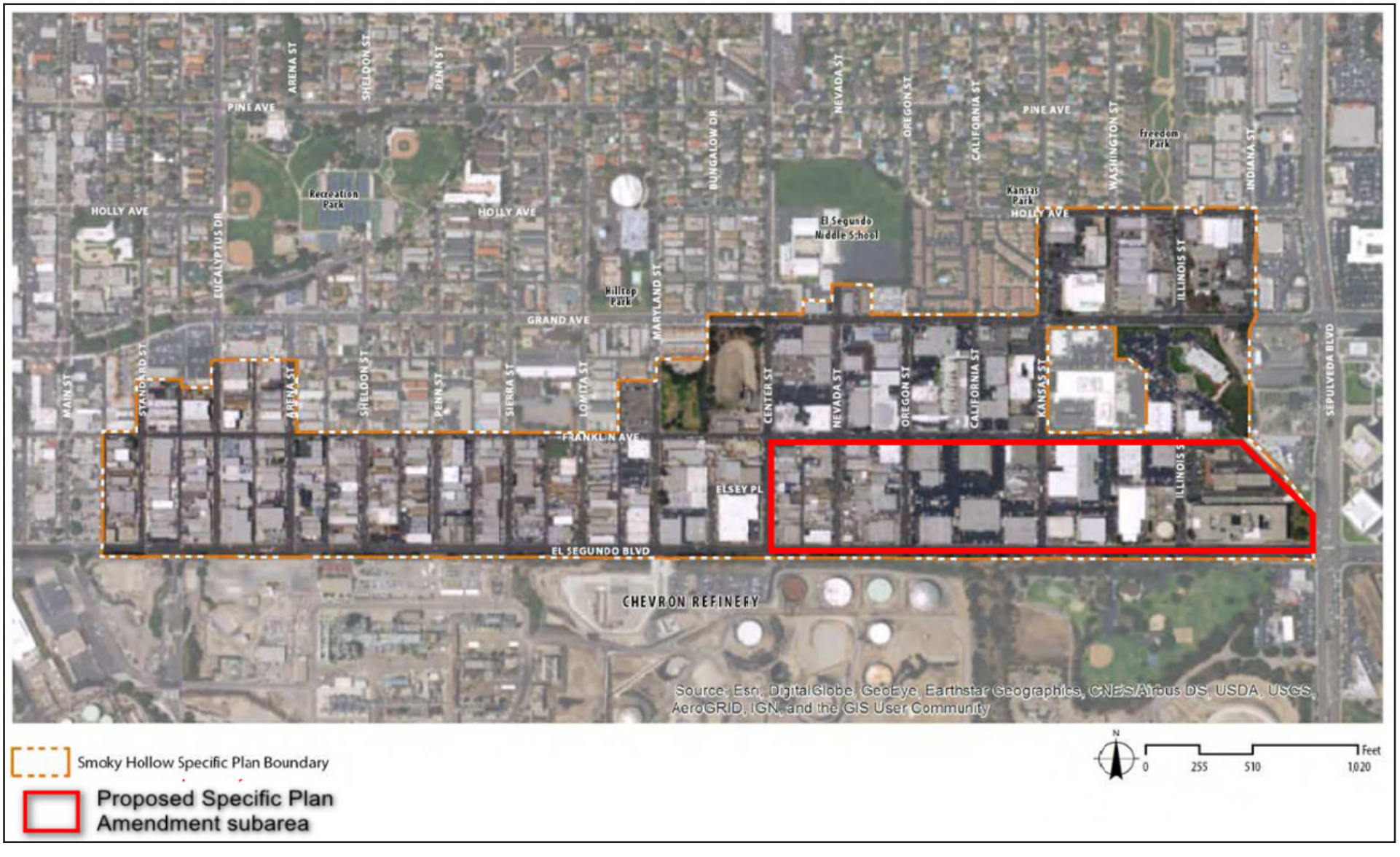

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Exhibit 5 SPA Subarea

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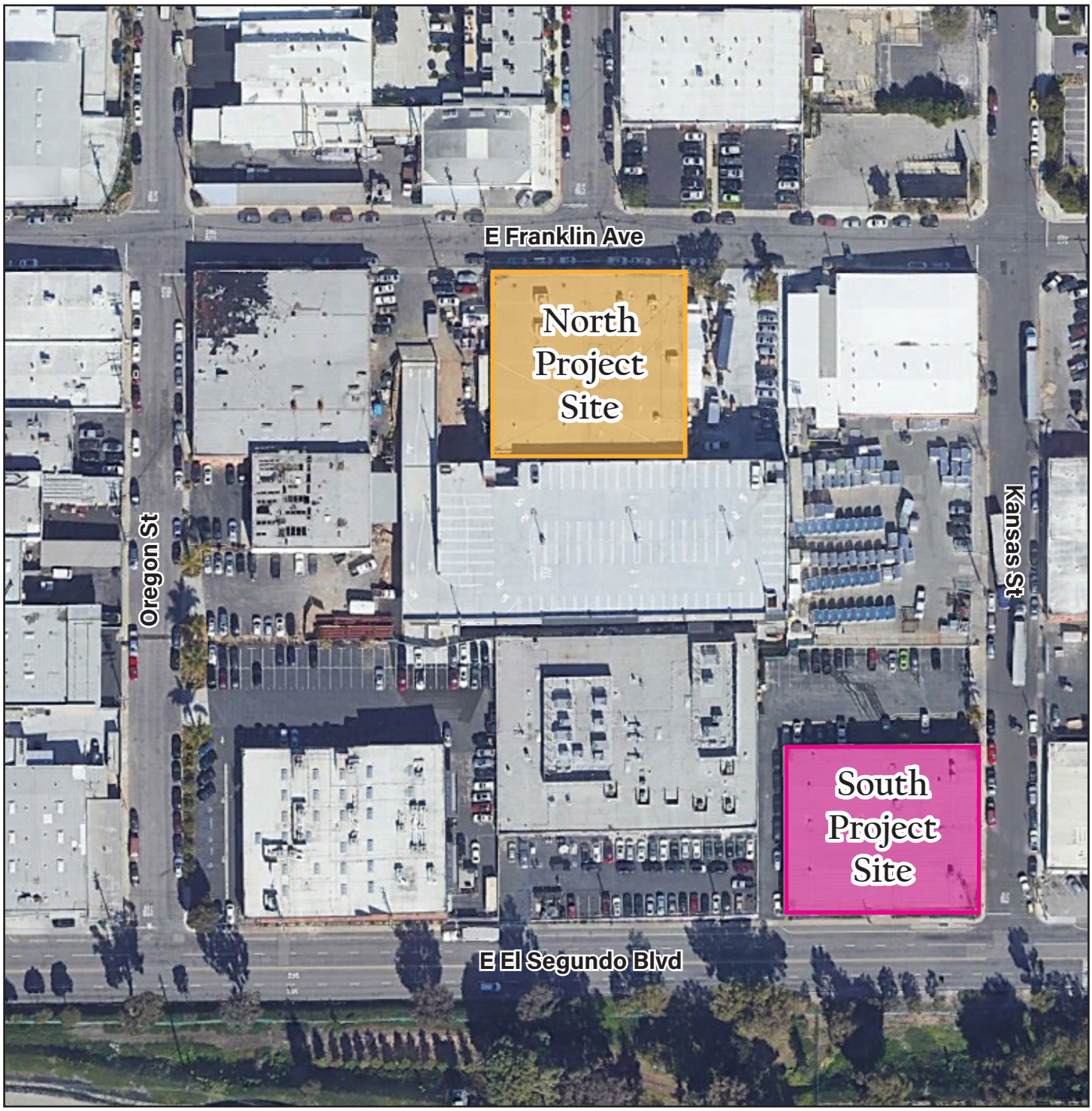
City of El Segundo, California



Not to Scale

Exhibit 6 Standard Works Development Project Sites

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City of El Segundo, California

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Exhibit 7 Surrounding Land Uses

Standard Works Development Project
City of El Segundo, California

8. Project Description

The Smoky Hollow Specific Plan (SHSP) provides a planning framework and long-term strategy to guide public and private investment in the 120-acre Smoky Hollow area. The SHSP utilizes a variety of planning tools, including: development standards, design guidelines (including height limits, signage, landscaping, etc.), and other regulatory tools and metrics; public infrastructure improvements; and a comprehensive strategic set of policy, physical, and programmatic implementation actions. The SHSP emphasizes flexibility and creativity to enable new businesses to thrive, and it supports the long-term health and expansion of the many existing businesses. According to the SHSP, it "builds on the eclectic nature of Smoky Hollow, sets policy to create a dynamic public realm, and grounds the regulatory framework in economic reality". For additional information on specific plan requirements, see Section 9, *Regulatory Framework, Smoky Hollow Specific Plan*.

Smoky Hollow Specific Plan Amendment

The SHSP sets forth development standards, including a height standard, for development within the SHSP area. The SHSP also establishes a discretionary process for developing a Community Benefits Plan (CBP)[1] which allows developers to deviate from some of the otherwise applicable development standards in exchange for incorporating specified community benefits into a project proposal.

There are two types or tiers of Community Benefit Plans within the SHSP:

Tier I addresses a FAR deviation up to 1.5 and one or more deviations to standards (neither of which is height or FAR) that exceed the minor deviation threshold (10%) allowed by Section 4.5.1 Administrative Adjustment.

Tier II addresses a building height deviation up to 50 feet, FAR greater than 1.5, or three or more deviations to standards (one of which is height or FAR) that exceed the minor deviation threshold (10%) allowed by Section 4.5.1 Administrative Adjustment.

A CBP Tier 1 application must demonstrate: the proposed additional building height, intensity, or deviation from development standards would not be detrimental to the public health, safety or welfare, or materially injurious to properties or improvements in the vicinity; the proposed community benefit provides exemplary project and/or streetscape design; and the proposed community benefit directly implements objectives of the Specific Plan. A CBP Tier II application must demonstrate these Tier I items plus the value of the community benefits bears a relationship to the value generated by the project; and the community benefits proposed do not principally benefit the project or occupants of the project, but rather provide a district or area-wide benefit to the larger Smoky Hollow Plan area.

[1] Community benefits are based on the principle that in exchange for allowing incremental increases in development intensity, the community should, in return, receive certain benefits, including beneficial design features such as publicly accessible open space and other development requirements that serve the community's core needs.

Projects within the SHSP area are allowed to request deviations from current City development standards with the approval of a Tier I or Tier II CBP. The proposed Development Project (see below) would/seeks to amend the SHSP to allow for an increase in the maximum permissible height for CBP Tier II qualifying projects. Allowable heights would increase to 60 feet from the current Tier II maximum of 50 feet only within a specific sub-area of the SHSP Smoky Hollow East area. Approval of the SPA is required before the Development Sites can be permitted at a maximum height of 59.5 feet.

The Project is proposing an amendment to the text of the SHSP Tier II Community Benefit Plan to allow for taller buildings in a Sub-area of the SHSP. Pursuant to Section 4.7 of the SHSP, "…*modifications to the text or exhibits of this Specific Plan may be warranted in the future to accommodate unforeseen conditions or events. The City will process revisions pursuant to California Government Code Section 65450, et seq. All Specific Plan amendments shall be found consistent with the El Segundo General Plan in compliance with Government Code Section 65454. The Specific Plan may be amended as often as deemed necessary by the City Council in compliance with Government Code Section 65453*."

Tier II Community Benefits Plan

A proposed project that exceeds development standards under the SHSP is required to submit a Community Benefits Plan and is considered through the review process described in Section 4.5.2: Community Benefits Plan (CBP) for Tier I and Tier II applicable projects.

The proposed Specific Plan Amendment (SPA) would modify the Height Development Standards for CBP Tier II qualifying projects only in a designated Sub-area of the Smoky Hollow Specific Plan area shown in Exhibits 4 and 5. The Sub-area occupies 30 of the 120 acres of the SHSP. The SHSP currently allows CBP Tier II level qualifying projects to deviate from maximum building height development standards up to a maximum height of 50 feet (to the building parapet not including elevator equipment or architectural features). Section 2.3.2, Development Tiers and Community Benefits, of the SHSP states **"**The current criteria for CBP Tier II projects are as follows per Table 2-2: Building Intensity and Height Standards by Zoning District and Table 4-1: Community Benefit Plan of the SHSP:

A. Building height deviation up to 50 feet;
B. Floor Area Ratio (FAR) > 1.5;
C. Three or more deviations to standards (one of which is height or FAR) that exceed the minor deviation threshold (10%) allowed by Section 4.5.1 Administrative Adjustment."

The modification to Tier II CBP applicable projects in the designated Sub-area of the Smoky Hollow East (SH-E) zoning district would only be the following:

A. Building height deviation up to 50 feet <u>except for the designated Sub-area of the Smoky Hollow East (SH-E) zoning district which will have a height deviation of up to 60 feet</u>;
B. Floor Area Ratio (FAR) deviation > 1.5;
C. Three or more deviations to standards that exceed the minor deviation threshold (10%) allowed by Section 4.5.1 Administrative Adjustment.

Proposed Development Project

Project Characteristics

The proposed Project also involves the redevelopment of two adjacent sites, South Site, referred to as Parcel A in Project documentation and technical studies, and North Site, referred to as Parcel E in Project documentation and technical studies, as previously shown in Exhibit 6. The Project proposes an office development including construction of two office buildings and a coffee pavilion. Table 1 summarizes the development characteristics of the two Development Sites. The proposed site plans for the two Development Sites are shown in Exhibit 8 (South Site Development Site Plan) and Exhibit 9 (North Site Development Site Plan). Appendix A contains development information relative to the two Development Sites described below.

Caretaker Units. It should be noted the original submitted Standard Works Project included four caretaker units on the top floor of each of the two Project buildings. These units were subsequently removed but the technical studies that were prepared to support the CEQA analysis for the original Project included the caretaker units. Therefore, the technical studies for the revised current Project incrementally overestimate potential Project impacts and, therefore, represent a conservative analysis.

South Site

The proposed Project for the South Site would develop a 1.01-acre property located at 1475 E. El Segundo Boulevard within the SHSP. The existing 19,311 sf, one-story brick building, located at 1475 E. El Segundo Boulevard would be preserved with two new levels added above it. This results in a total floor area of 63,915 square feet for the South Site (FAR = 1.45) for R&D and office use. The proposed construction activities on the South Site would include:

- Construction of a 44,604-square foot addition to the existing building that would be structurally preserved in place for a total building floor area of 63,915 square feet.
- The three-story building would have a maximum height of 59 feet and 6 inches from average grade to the top of the building.

Exhibit Figure 8 illustrates the proposed site plan for the South Site.

North Site

The proposed Project for the North Site would develop a 1.07-acre portion of a 4.34-acre property located at 1320-1330 E. Franklin Avenue within the SHSP. The existing 19,493 square foot, one-story brick building located at 1330 E. Franklin Avenue would be preserved and two levels would be added above it. In addition, a new pavilion building would be constructed and would include a public café. This would result in a total of 65,061 square feet of floor area for the North site (FAR = 0.95), including 64,295 sf for R&D and office use and 766 sf for the pavilion building.

The proposed construction activities on the North Site would include:

- Construction of a two-story 44,802-square foot addition to the existing building that would be structurally preserved in place, for a total floor area of 65,061 square feet (including the two-story pavilion noted below). The three-story main building would have a maximum height of 59 feet and 6 inches, from average grade to the top of the building.

- Construction of a new two-story pavilion building to serve the neighborhood with a café and gathering point at the entry of a new public park accessible by the public. The new pavilion will have 766 square feet of floor area and will reach a maximum height of 23 feet and 8 inches.
- Construction of a new 5,000-square foot public outdoor park with park seating, picnic tables, shade trees and landscaping.

The proposed site plan for the North Site is provided in Exhibit 9.

Table 1 Standard Works Project Summary

Project Site	South	North	Total
Project Site (acres)	1.01	4.34	5.35
Total	**1.01**	**4.34**	**5.35**
Existing Development and Proposed Demolition			
Project Site (square feet)	19,311	19,493	38,804
Total to be demolished	0	0	0
Total Existing Building Space to remain	**19,311**	**19,493**	**38,804**
Proposed Buildings and FAR			
Project Site (square feet)	44,604	45,568	90,172
Project Site Parking Structure	N/A	N/A	N/A
New Construction	44,604	45,568	90,172
Total Development (sf)	**63,915**	**65,061**	**128,976**
Project Site FAR[1]	1.45	0.95	
Maximum Building Heights[2]			
Project Site (feet)	59’ 6”	59’ 6”	59’ 6”
Landscaping, Open Space, and Parking			
Project Site Parking (spaces)	165	168	333
Total Parking	165	168	333
Landscape Area (sf)	4,397	19,190	23,587
Private Open Space (sf)	11,731	10,599	22,331
Public Open Space (sf)	0	5,000	5,000
Total Open Space[4]	**11,731**	**15,599**	**50,918**

sf: square feet

[1] Floor Area Ratio (FAR) includes the office and café uses but does not include the parking structures.

[2] Above the average grade to top of building.

[3] Includes both new on-grade onsite spaces plus spaces in existing parking structure

[4] Open space includes both pedestrian hardscape and planting.

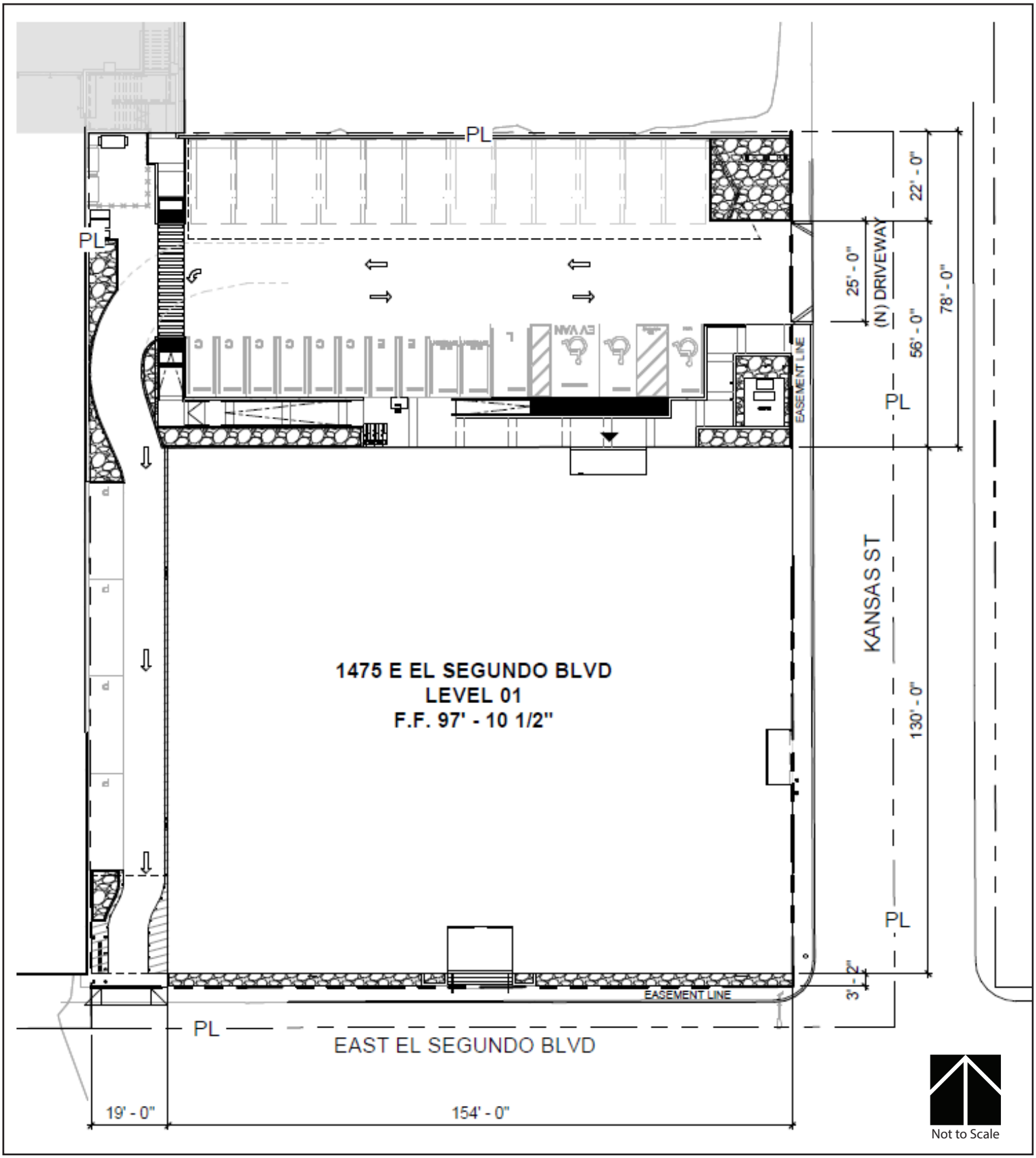

Exhibit 8 South Site Development Plan

Standard Works Development Project
City of El Segundo, California

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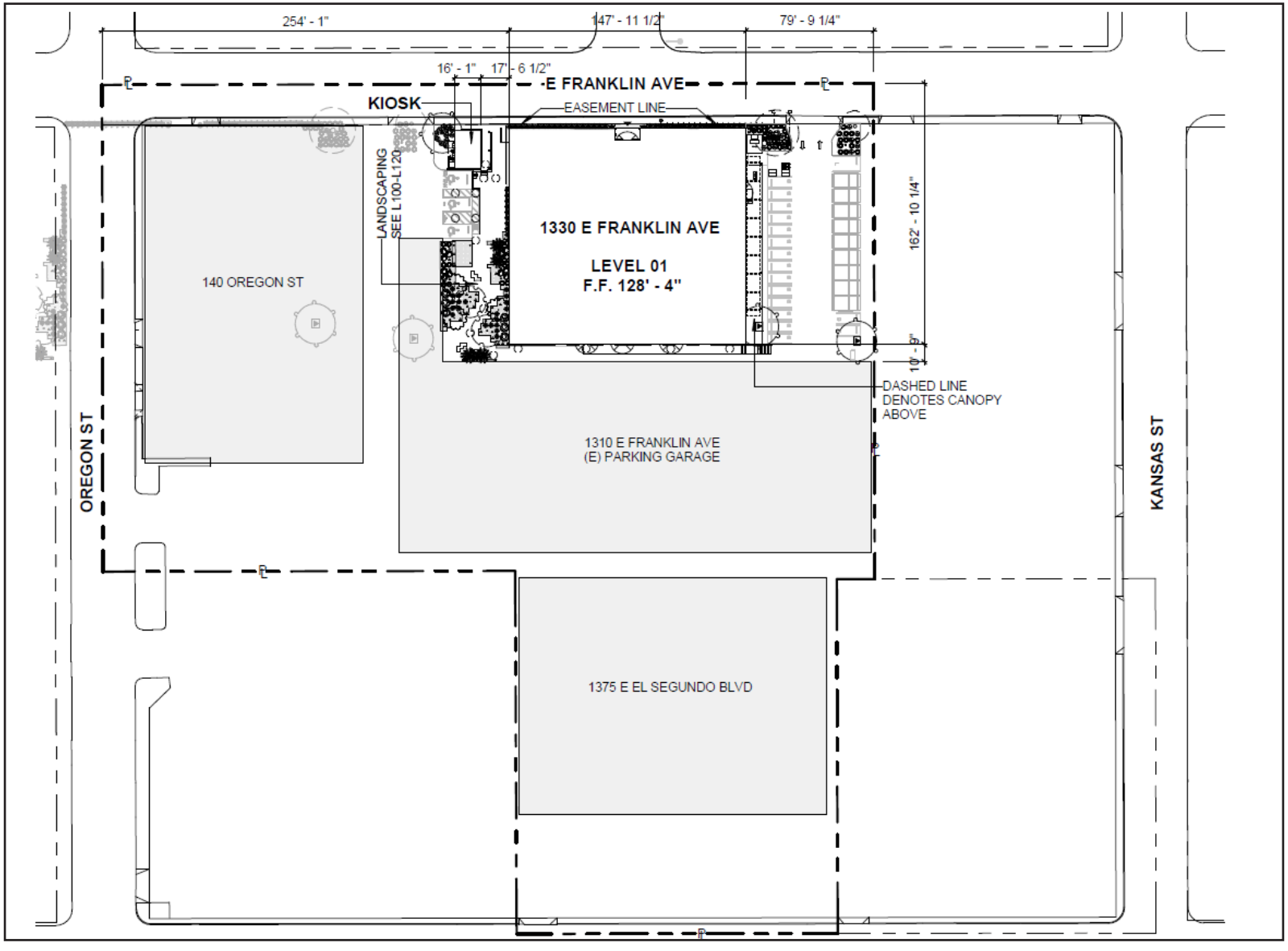

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Exhibit 9 North Site Development Plan

Standard Works Development Project
City of El Segundo, California

Architecture, Open Space, and Landscaping

The Project proposes a contemporary industrial aesthetic design using exposed steel, large steel 1950s mid-Century-like industrial windows, exposed sandblasted custom concrete masonry unit (CMU) block walls, large scale balconies and exterior decks, reused red brick and glulam wooden beams from the same building, and other period materials that will complement the character of the Smoky Hollow neighborhood. Preserving the existing 1950's red brick facade is an objective of the proposed design as well as a goal of the Smoky Hollow Specific Plan. The existing brick walls will be sandblasted to bring their color and vibrancy back to life and the new block walls will be custom fabricated onsite and also have a sandblasted finish to expose the aggregate. The Project is intended to have a "lively and pedestrian-oriented atmosphere which will contribute to the ongoing development in the Smoky Hollow area." Elevations of the Project are shown in Exhibit 10, Project Elevations.

The proposed Project will add 23,587 square feet of new landscaping on both Project Development Sites consisting of drought-tolerant and California native plant species (see Exhibit 7: Landscaping Plan). The Project will provide private open space for office tenants in rooftop patios - 11,731 square feet on South Site and 10,599 square feet on North Site. The Project will also provide approximately 5,000 square feet of public open space including an outdoor pocket park and pedestrian walkways with benches and trees to provide shade. Landscaping for the Project is shown in Exhibit 11, Landscaping Plans.

Site Access and Parking

South Site

This part of the Project will require a total of 165 parking spaces of which 42 on-grade parking spaces will be provided on-site. The remaining required 123 parking spaces will be provided in the recently completed parking garage (on the North Site) through a proposed Off-Site Parking Covenant (per El Segundo Municipal Code Section 15-15-3(H) and SHSP Development Standards Table 2-2(H).)

North Site

This part of the Project will require a total of 168 parking spaces all of which will be provided onsite. It will include 38 on-grade parking spaces and the remaining 130 spaces will be provided in the recently completed parking garage structure on this parcel.

Utilities and Infrastructure Improvements

The Project is located in a portion of the City's developed area where utilities and public infrastructure are already in place. The applicant is proposing to underground all power lines on E. Franklin Ave for the North Site and on Kansas Street for the South Site. The Project design includes low-impact development (LID) and best management practices (BMP) features for stormwater retention on the site, including groundwater infiltration basins. As with the existing development on the Development Sites, the proposed Project would utilize all City public services such as police, fire, and other public institutions.

Exhibit 10 Project Elevations (North Site)

Standard Works Development Project
City of El Segundo, California

Exhibit 10 Project Elevations (South Site)

Standard Works Development Project
City of El Segundo, California

PICNIC TABLE

CAFE TABLE

I-BEAM BENCH

I-BEAM

PRECAST BEAM BENCH

N

0' 20' 40'

SCALE: 1" = 20'

Exhibit 11 Landscaping Plan (North Site)

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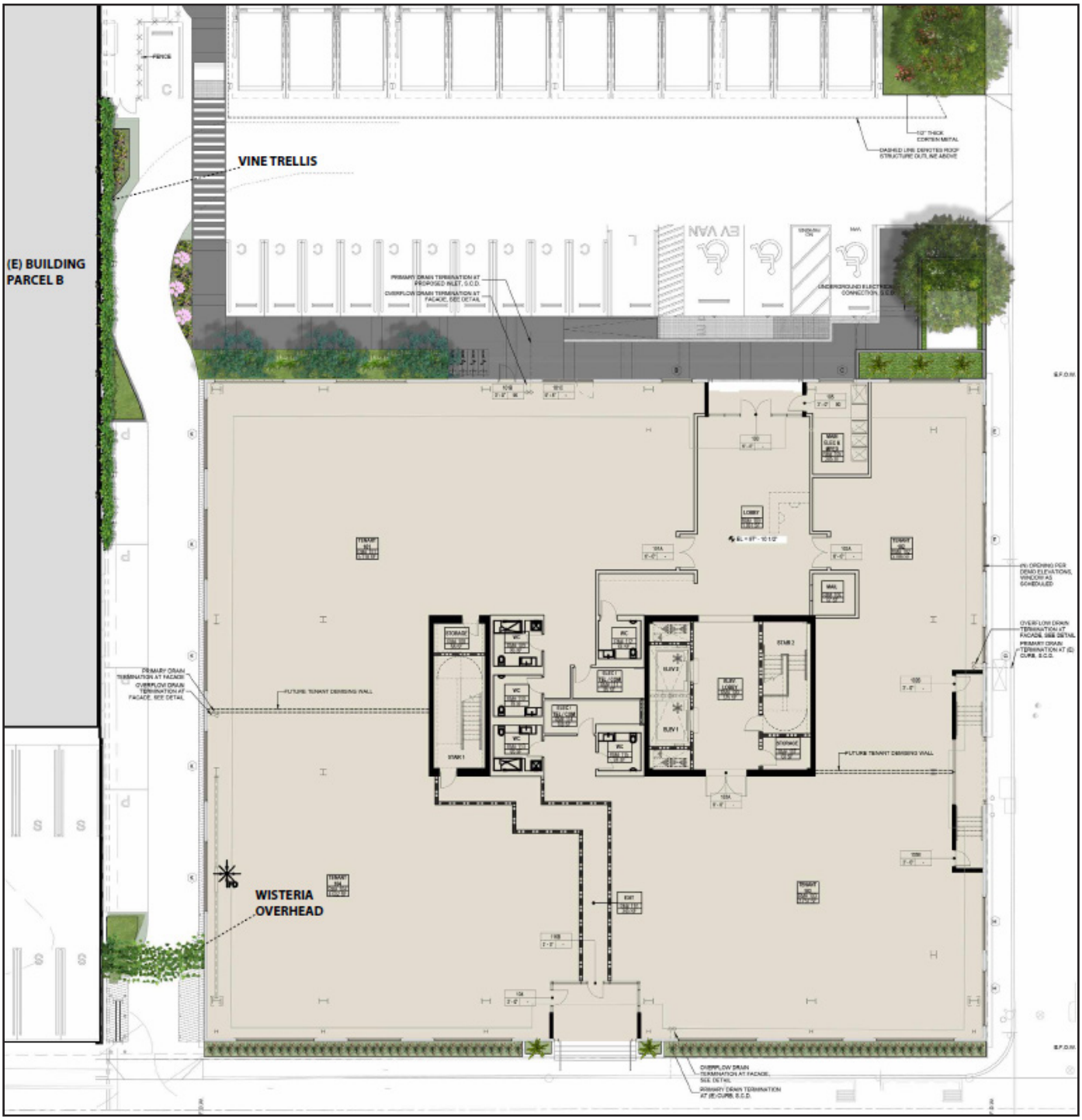
City of El Segundo, California



FIRST FLOOR PLANTING LEGEND

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	QTY. LIST*	SIZE	MATURE SIZE	WATER USE (WUCOLS)	NOTES
	Melaleuca linariifolia	Snow in Summer	2	36" BOX	30' H&W	LOW	
	Podocarpus elongatus 'Monma'	Icee Blue	3	36" BOX	25' H&W	MOD	

SUCCULENTS / SHRUBS / GROUNDCOVER

	Hesperaloe 'Brakelights'	Brakelights Red Yucca	74		2-3' H&W	LOW	
	Asparagus densiflorus 'Myers'	Foxtail Fern	18		2' H X 2-3' W	MOD	
	Leucadendron 'Jester'	Jester Conebush	7		4-5' H&W	LOW	
	Muhlenbergia capillaris 'Lendca'	Regal Mist Pink Muhly Grass	3	5G	4' H X 3' W	MOD	
	Yucca rigida	Blue Yucca	5	5G	12' H X 5' W	LOW	
	Westringia fruticosa 'WES05'	Mundi Westringia	34		1-2' H X 4-6' W	LOW	306 SF @ 36" OC TRIANGULAR SPACING
	Rosmarinus officinalis 'Huntington Carpet'	Huntington Carpet Rosemary	69	5G	1-2' H X 8' W	VERY LOW	242 SF @ 24" OC TRIANGULAR SPACING
	Rhapidolepis umbellata 'RutRhaph1'	Southern Moon Yedda Hawthorn	12	5G	5' H X 6-8' W	LOW	96 SF @ 36" OC TRIANGULAR SPACING
	Campsis radicans 'Monbal'	Balboa Sunset Trumpet Vine	3		+30' L	MOD	
	Wisteria sinensis 'Cooke's Purple'	Purple Chinese Wisteria	3		20-30' L	MOD	
		TOTAL LIST	##				
		TOTAL OTHER					

*QUANTITIES LISTED FOR CONVENIENCE ONLY; CONTRACTOR TO VERIFY
**PLANTS OVER STRUCTURE OR IN PLANTERS RARELY REACH MATURE SIZE

TREES PROVIDED (PER SHSP TABLE 2-4)	
TREES WITH A PROJECTED GROWTH TO A MINIMUM OF 25' H&W (8 REQUIRED)	9
ADDITIONAL TREES LESS THAN 25' H&W	7
TOTAL TREES PROVIDED	16
IRRIGATION (PER SHSP TABLE 2-4)	
ALL LANDSCAPED AREAS, INCLUDING TREES AT SURFACE PARKING LOTS, SHALL BE PROVIDED WITH APPROPRIATE PERMANENT WATERING FACILITIES	

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Exhibit 11 Landscaping Plan (South Site)

Standard Works Development Project
City of El Segundo, California

Sustainability Features

1. Level 1 Red Brick Walls – The design reuses the existing red brick exterior walls and is saving considerable material and all of the environmental costs associated with demolishing rather than rebuilding.

2. Level 2 & 3 Block Walls – The design and detailing of the addition to the existing building is not typical. The proposed exterior façade is simply concrete masonry blocks with no interior or exterior finishes – a single building material that acts as interior finish, exterior finish, waterproofing, vapor barrier and structural system all in itself, and is installed by a single trade/person who is already at the jobsite. In comparison, a typical building façade assembly may require multiple layers of materials and trades including paint, drywall, drywall mudding and taping, framing/nailing & insulation, exterior sheathing, waterproofing, the final façade material and associated attachments.

   NOTE: These two Project features will eliminate hundreds of thousands of pounds of waste materials associated with typical building façade assemblies and all the greenhouse gas emissions associated with the production and installation of the walls.

   Exposed Structural Steel - Additionally, in a “typically” designed building, the structure (the actual columns and beams that hold up the building) is typically hidden from view or covered up with even more material. The proposed design exposes the columns and beams and features them as design elements, which uses less materials and results in less pollution.

3. Independent Heating, Ventilating, and Air Conditioning (HVAC) Systems – each suite within the building is designed with its own independent HVAC system, allowing for efficient heating and cooling.

Project Construction

Construction of the North and South sites are anticipated to commence in January/February 2022 and January 2023, respectively. Construction activities on the North site would last approximately 14.5 months, and construction activities on the South site would last approximately 17 months.

Community Benefits Plan

The design of the building proposed on the North site exceeds the current base standard for building height in the SHSP, and the design of the building proposed on the South site exceeds the current base standards for building height and allowable Gross Floor Area Ratio (FAR). Projects within the SHSP area are allowed to request deviations from current City development standards with the approval of a Tier I or Tier II Community Benefits Plan. The proposed project would amend the SHSP to allow for an increase in the maximum permissible height for CBP Tier II qualifying projects. Allowable heights would increase to 60 feet from the current Tier II maximum of 50 feet. Approval of the SPA is required before the Development Sites can be permitted at a maximum height of 59.5 feet. The Project requests the following deviations from the current development standards which requires a Tier II Community Benefits Plan:

Additional Building Height. Proposed building heights of up to 59.5 feet on both Project sites would exceed the SHSP Base Standard height of 35 feet.

Additional Building FAR. Proposed 1.5 floor area ratio (FAR) (an additional 21,983 square feet) on the South site exceeds the SHSP Base Standard FAR of 1.0.

In exchange for the above deviations allowed by Tier II CBP, the applicant is proposing the following community benefits and improvements, at the applicant's expense, pursuant to Smoky Hollow Specific Plan Section 4.5.2. The following Community Benefits are based on objectives and suggestions directly identified as development standards in the SHSP with the objective of benefiting the Smoky Hollow Specific Plan area. Additionally, the Specific Plan contains 32 design guidelines in five categories: building character, open space, landscaping, connectivity, signage and public art and Public Realm. Compliance with at least 17 of the guidelines is required to be considered as an exemplary project; the proposed Project incorporates 29 of the 32 design guidelines, far exceeding the minimum threshold for exemplary projects. A summary of the main the community benefits that are proposed for the Project include the following:

Underground Utilities. The Project proposes to underground all electric power and low voltage phone and data lines that currently serve the buildings on East Franklin Ave and Kansas Street.

Public Seating. Proposed architectural seating will be provided along the sidewalk area within the public right-of-way (ROW) facing E. Franklin Avenue and Kansas Street.

Coffee Pavilion/Public Café. The proposed Project would also include a 276-square foot public café (Coffee Pavilion) and associated outdoor dining area immediately adjacent to the E Franklin sidewalk, in order to active the street and provide a convenient break location for local neighbors. The café is part of the proposed 5,000-square foot public park that will be a landscaped focal point of the Project and of the surrounding area as well.

Architecture that enhances building character. Explained above under "Architecture, Open Space, and Landscaping" and "Resiliency Features".

Open space that facilitates gathering. Explained above under "Architecture, Open Space, and Landscaping" and "Resiliency Features".

Landscaping and environmental design. Explained above under "Architecture, Open Space, and Landscaping" and "Resiliency Features".

In addition, the Development Project will provide the following specific community benefits as summarized from the CBP Tier II application scoring sheets:

Group A – Enhance Building Character

A1. *Build on the quality industrial character:* Project has exposed steel beams and large industrial-style windows.

A2. *Convey a sense of the old and new:* Project will preserve ground floor red brick exterior while adding two setback floors of a modern industrial building

A3. *Build upon existing context:* Project stays within existing footprint but adds 2 floors with roof decks.

A4. *Conserve and retain the character-defining features:* Project preserves ground floor red brick exterior and three historical building entrances.

A5. *Encourage additions that complement the character-defining features:* Project has large industrial windows with exposed steel beams characteristic of mid-century architecture but stacked blond block with exposed aggregate and stain coloring to enhance the industrial appearance.

A6. *Incorporate small, medium, and large scales:* Project includes several interlocking design elements of different scales for visual interest including large to small "nested" windows and balconies to break up the building facade into different sized elements.

A7. *Enhance design at the pedestrian level:* Project will have extensive landscaping along all street frontages with pedestrian scale seating.

A8. *Specify 360^{o} architecture:* Project will have enhanced architecture on all four sides of each building.

A9. *Enhance entry expression:* Project has new landscaping and a double high entry portal at the southwest corner.

A10. *Encourage the use of roll-up doors and sliding walls at street frontage:* Roll-up doors are used in several main entrance locations.

A11. *Orient secondary entries to alleys:* Some secondary access points are oriented toward local alleys.

A12. *Incorporate different materials, colors, and textures:* Project includes a variety of materials, colors, and textures, including red brick, medium grey block, black steel, corten, architectural board formed concrete, and glass.

Group B – Facilitate Gathering

B1. *Form an active street wall:* Project has a new two-story entry portal with enhanced landscaping along street frontages and distinctive entrances.

B3. *Develop outdoor gathering spaces:* Project will have a pocket park with outdoor seating.

B5. *Provide ease of access:* The Project will have multiple pedestrian and vehicular access points and ground floor tenants will have direct access to adjacent streets.

B6. *Enhance surface parking:* Project will have shade coverings for surface parking lots plus stacked parking using current technology.

B7. *Use enduring quality paving materials:* Project will have special paving materials to demarcate pedestrian walkways with integral color and crystal aggregate.

B8. *Provide street furniture:* Project will provide street furniture for seating at the pocket park.

B9. *Use exterior lighting to accentuate safety and design:* Project will provide period lighting on all sides of buildings for pedestrian safety.

Group C – Incorporate Landscaping and Environmental Design

C1. *Design layered and lush landscaping:* Project will have extensive landscaping per landscaping plan.

C2. *Select drought-tolerant and native plants:* Project landscape plan has drought-tolerant and native plants throughout.

C3. *Utilize planters and pots to provide greenery:* Project has planters and pots on Level 2 and 3 decks and balconies and on the rooftop.

C4. *Improve landscaping in parking areas:* Parking areas include landscaping on at least

two sides (those facing the buildings).

C5. *Use fences and walls as an extension of the architecture:* Project includes monument signs for both buildings that compliment and extend the building architecture.

C6. *Use natural light:* Project has large windows for 2-story spaces with mezzanines to allow natural light in all interior spaces.

Group D – Encourage Connectivity

D1. *Install bike facilities:* Two bike racks will be installed at each Project building.

Group E – Signage, Way Finding, and Public Art

E1. *Design signs as an integral component:* Project includes integrated tenant signage.

E2. *Incorporate way-finding through integral design:* Project has architecturally integrated signage for both pedestrians and vehicles.

E3. *Encourage public art:* Project will have a large scale art wall on the west side of the north building.

Public Realm

PR1. *Underground utilities:* The incoming power and low voltage cables for data and phone will be consolidated into one location and undergrounded.

9. Regulatory Setting

The following presents a discussion of other plans and documents that affect the Project Site.

Smoky Hollow Specific Plan

The Smoky Hollow Specific Plan (SHSP) covers approximately 0.2 square mile (120 acres) with a variety of lot sizes located on small streets. The land use pattern and character of the SHSP area are largely shaped by the original industrial uses that developed during the mid-20th century to serve the Los Angeles International Airport, aerospace/defense, and nearby refinery industries. The location of the SHSP is shown in Exhibit 12.

The SHSP is a “specific plan” under State planning law and is one of several policy and regulatory tools used by the City of El Segundo to implement the City’s General Plan. The SHSP implements the General Plan through the establishment of more detailed policies, regulations, and actions specifically focused on the SHSP area, and generally provides for the reuse and focused redevelopment of properties within the 120-acre plan area, at higher intensities. It also allows for a greater proportion of land uses related to office and research and development compared to the existing light industrial uses. The SHSP also provides for improvements to the circulation system, increased on street parking, streetscape improvements, and enhanced development standards and design guidelines (City of El Segundo 2018a).

SHSP Development and Growth

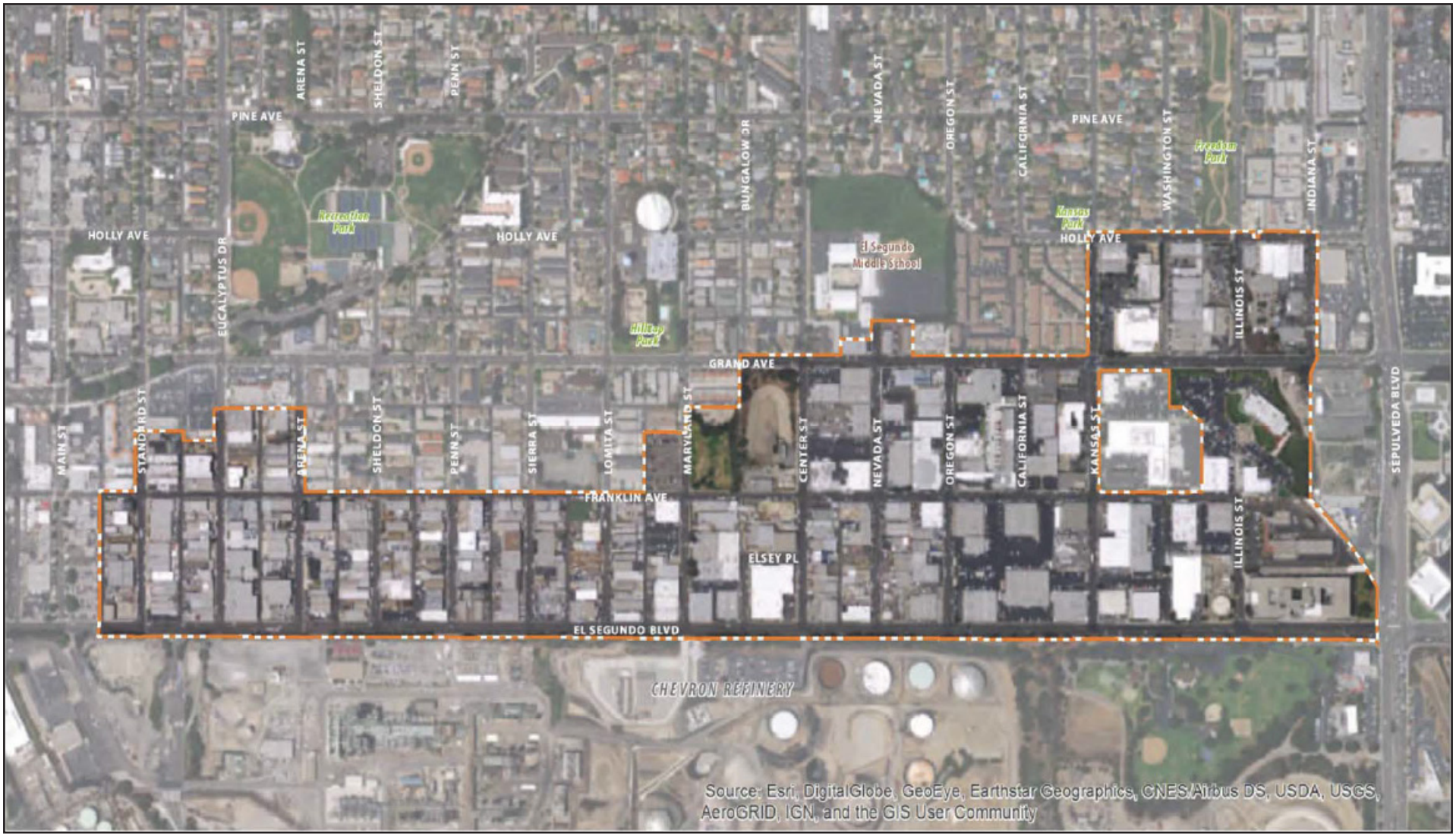
When it was approved in March 2018, the SHSP contained 329 parcels encompassing 94.3 net acres (not including street rights-of way) and was already developed with approximately 2.46 million square feet of building area mainly for industrial and office land uses (see Table 1: Smoky Hollow Specific Plan Land Uses).

The SHSP estimated a development capacity of up to 2.97 million square feet of office, industrial, and public facility building space through 2040. This represents a net increase of 517,094 square feet of total building area for residential, office, and commercial uses, as shown in Table 1 below. Table 1 indicates the SHSP will result in a net increase of 1,213,751 additional square feet of office space by 2040, with a total increase in building area of 2,973,910 square feet compared to an existing (2018) 2,456,816 square feet. At present there is still approximately 30 acres of developable land left within the SHSP although the proposed Project represents redevelopment of an existing light industrial site.

Table 2: Smoky Hollow Specific Plan Land Uses

Land Use Category	Existing Overall Intensity	2040 Overall Intensity	Difference
Office	330,607	1,544,358	+1,213,751
Research & Development	110,202	514,786	+404,584
Light Industrial	1,901,602	777,900	-1,123,702
Commercial	84,445	106,906	+22,461
Public Facilities	29,060	29,060	0
Parking	900	900	0
Residential[1]	9 units	15 units	+6 units
Total Building Area	**2,456,816**	**2,973,910**	**+517,094**

Source: SHSP EIR, Table 2-1. Existing and Projected Year 2040 Land Use
[1] Caretaker Units



Smoky Hollow Specific Plan Boundary

N

0 250 500 1,000 Feet

http://www.migcom.com • 951-787-9222

Exhibit 12 SHSP Planning Area Map

Standard Works Development Project
City of El Segundo, California

MIG

Smoky Hollow Specific Plan Environmental Impact Report

The Final Environmental Impact Report for the Smoky Hollow Specific Plan Update, State Clearinghouse No. 2017031071 (EIR, SHSP EIR) was certified by the City in October 2018 in accordance with Sections 15086, 15088, 15089 and 15132 of the California Environmental Quality Act (CEQA) Guidelines. The SHSP EIR was a "Program EIR" as described in Section 15168 of the CEQA Guidelines, which is an EIR that is prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically, (2) as logical parts in the chain of contemplated actions, (3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways. Pursuant to CEQA Guidelines Section 15168(c), later activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152 of the CEQA Guidelines. In accordance with Sections 15168(c) and 15152 of the CEQA Guidelines, the analysis contained in this Initial Study tiers from the SHSP EIR.

The SHSP EIR adopted a Mitigation Measure Monitoring and Reporting Program to mitigate any impacts from the implementation of the SHSP (City of El Segundo 2018b). The EIR concluded that there were potential impacts on Biological Resources, Cultural Resources, and Transportation that would require mitigation in connection with future development projects. The mitigation measures adopted for the SHSP that would apply to the Project are listed below in Table 3 and at the end of this document along with all Project-specific measures recommended as part of the environmental evaluation of the Project.

Table 3: Smoky Hollow Specific Plan Mitigation Measures

Identified Impact	Mitigation Measure
Biological Resources	
Potential impacts on special-status species, nesting birds, and migratory birds.	**BIO MM 7-1.** To avoid impacts to nesting birds, construction activities and construction noise should occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occurs within the avian nesting season (during the period from February 1 to September 1), areas within 100 feet of a development site shall be thoroughly surveyed for the presence of nests by a qualified biologist no more than five days before commencement of any vegetation removal. If it is determined that the Project Site is occupied by nesting birds covered under the Migratory Bird Treaty Act, mitigation measure 7-2 shall apply.
Potential impacts on special-status species, nesting birds, and migratory birds.	**BIO MM 7-2.** If pre-construction nesting bird surveys result in the location of active nests, no grading, vegetation removal, or heavy equipment activity shall take place within an appropriate setback from occupied nests as determined by a qualified biologist. Protective measures (e.g., established setbacks) shall be required to ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code requirements. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active

Identified Impact	Mitigation Measure
	nest areas to ensure that no inadvertent impacts occur. A report of the findings, prepared by a qualified biologist, shall be submitted to the CDFW prior to construction-related activities that have the potential to disturb any active nests during the nesting season.
Cultural Resources, Paleontological Resources, and Tribal Cultural Resources	
Adverse change in the significance of a historic resource	**CULT MM 8-1.** Prior to issuing any permit for demolition or redevelopment of a building in the Specific Plan area that is 50 years old or greater, an assessment of the building must take place by a person who meets the *Secretary of the Interior's Professional Qualifications and Standards* for history, architectural history, architecture, or historic architecture to assess if it meets the criteria for inclusion on a historic register. If a building meets the criteria for inclusion on the California or National registers, the City will have to prepare and file a completed DPR 523 form with the South Central Coastal Information Center and the California Office of Historic Preservation, and the building will be treated as a historic resource under CEQA, subject to all regulations that relate to the treatment of historic resources.
Adverse change in the significance of an archaeological, paleontological or tribal cultural resource	**CULT MM 8-2.** Prior to the commencement of grading or demolition of subsurface structures, a professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards, shall conduct a brief archaeological and paleontological informational session for construction personnel. The training session may consist of an in-person meeting or a written handout describing: (1) how to identify archaeological and paleontological resources that may be encountered during earth-moving activities and (2) the procedures to be followed in such an event, including contact information for the appropriate entities if archaeological or paleontological resources are discovered.
Adverse change in the significance of an archaeological, paleontological or tribal cultural resource	**CULT MM 8-3.** In the event that archaeological or paleontological resources are unearthed during ground-disturbing activities, the ground- disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find, where construction activities will not be allowed to continue until a qualified archaeologist or paleontologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Work shall be allowed to continue outside the buffer area. If the archaeologist identifies the find as a tribal cultural resource or suspects it to be a tribal cultural resource, the City will contact the Native American Heritage Commission (NAHC) to report the discovery, and will contact local Native American tribal representatives as directed by the NAHC. Should the newly discovered artifact(s) be determined to be a tribal cultural resource, Native American construction monitoring will be initiated. The City shall coordinate with the archaeologist and tribal representative(s) to develop an appropriate treatment plan.
Greenhouse Gas Emissions	
Conflict with an applicable plan, policy, or regulation adopted for	**EECAP 4-1.** *Encourage or Require Energy Efficiency Standards Exceeding Title 24.* This measure will develop City

Identified Impact	Mitigation Measure
the purpose of reducing the emissions of greenhouse gases	staff to be resources in encouraging and implementing energy efficiency beyond that required by current Title 24 Standards.
Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases	**EECAP 5-2.** *Promote Water Efficiency Standards Exceeding SB X7-7.* In addition to SB X7-7, more actions are being studied or have been taken to exceed water efficiency standards. These efforts include education and outreach practices that could be combined with residential and commercial EECAP actions that emphasize the reuse of recycled/gray water and promote harvesting rainwater. Approximately 1,873 kWh can be saved for every acre foot (AF) of water use replaced by recycled water.

Source: City of El Segundo 2018b

[1] Transportation MMs from the SHSP were deleted because they were based on Level of Service (LOS) and CEQA documents can no longer recommend LOS mitigation, only mitigation for vehicle miles traveled (VMT).

10. Required Approvals

The City of El Segundo is the Lead Agency for the proposed Project. As the Lead Agency, the City of El Segundo City Council has the ultimate authority to approve or deny the Project. The proposed Project would require the following approvals:

- Specific Plan Amendment (SPA) No. 21-01 to modify the Height development standards for CBP Tier II qualifying projects in a Sub-area of the Smoky Hollow Specific Plan area.
- Tier II Community Benefit Plans (CBP No. 19-02 for 1475 E. El Segundo Blvd; CBP 19-03 for 1320-1330 E. Franklin Ave) to permit deviations from height and floor area ratio (FAR) from base development standards per the Specific Plan.
- Site Plan Review to ensure that the Project is consistent with the goals, policies and objectives of the general plan, the Specific Plan, and the El Segundo Municipal Code (ESMC).
- Master Sign Program (MSP) No. 21-01 for Standard Work campus.

11. Native American Consultation

One tribe has requested to be notified of projects in the City of El Segundo—the Gabrieleño Band of Mission Indians – Kizh Nation. The City of El Segundo initiated consultation with the Gabrieleño Band of Mission Indians – Kizh Nation in June 2021 pursuant to Public Resources Code Section 21080.3 (also known as Assembly Bill [AB] 52) for this Project. Please refer to the Explanation of Checklist Responses for Item **18**. *Tribal Cultural Resources*, for information regarding notification of and consultation with the Gabrieleño Band of Mission Indians – Kizh Nation.

Since the Project includes a Specific Plan Amendment, the Project must comply with Senate Bill (SB) 18, Government Codes Sections 65352.3 and 65352.4. SB 18 requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans. SB 18 letters were sent to representatives from the Gabrieleño Band of Mission Indians – Kizh Nation, Gabrielino /Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino-Tongva Tribe, Santa Rosa Band of Cahuilla Indians,

and Soboba Band of Luiseno Indians on July 28, 2021. The tribes have 90 days to request consultation from receipt of the notification. The City has yet to receive a request to consult under SB 18 from any tribe.

Environmental Factors Potentially Affected

This Project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
■	Biological Resources	■	Cultural Resources	☐	Energy
■	Geology/Soils	■	Greenhouse Gas Emissions	■	Hazards & Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	■	Transportation	■	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

□ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable

standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

12/13/2021
Date

EDUARDO SCHENBORN
Printed Name

PLANNING MANAGER
Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	■
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

The proposed Project includes the SPA and two Development Sites both of which are within the SPA Sub-area. The SPA Sub-area is close to the Pacific Ocean but in a highly urbanized area, and views are mainly of various urban land uses. Views of the ocean to the west or landforms to the southeast are visible from elevated positions (i.e., taller buildings). There are no scenic resources or highways in or adjacent to either the development or SPA portions of the Project area but there are substantial light and glare from adjacent urban uses.

a. Would the project have a substantial adverse effect on a scenic vista?

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

(a-b) A scenic vista is generally considered as a publicly accessible, prominent vantage point that provides expansive views of highly valued landscapes or prominent visual elements. As described in the General Plan, the City is located within the urbanized Los Angeles area, and is considered part of the Los Angeles International Airport (LAX)/South Bay subregion at the southwestern edge of the Los Angeles coastal basin. The Project site is not located within a designated state scenic highway and not visible from any designated scenic highways.

The SPA proposes an increase in maximum building height from 50 to 60 feet, within a small Sub-area of the SHSP. The SHSP EIR concluded the SHSP area had no scenic vistas, contained no scenic resources and was not within or visible from a scenic highway so the proposed SPA would have no impact on a scenic vista nor will it damage scenic resources or affect a scenic highway and no programmatic mitigation is required. Further, due to the urbanized character of the surrounding area, approval of the SPA would not degrade the visual character of the site and its surroundings. The SHSP EIR concluded the SHSP would actually improve the visual quality and character of the area by removing dilapidated buildings and older uses. Therefore, visual impacts of the SPA would be less than significant and no programmatic mitigation is required.

The Development Sites are located approximately 1.8 miles east of the coastline but scenic views of the Pacific Ocean are not available from the Project area due to existing development. The closest scenic vista is of the elevated Palos Verdes Estates approximately 8.3 miles southeast of the Development Sites. The Project is within the SHSP which has no designated scenic vistas, so development of the Project will have no impact on a scenic vista, and no mitigation is required.

The Project will develop a small Sub-area of the SHSP which is in an urban area and has no scenic resources. The closest officially designated state scenic highway is State Route 27 located approximately 13.7 miles northwest of the Development Sites. The closest roadway eligible for designation as a state scenic highway is State Route 1 located approximately 6.1 miles northwest of the Development Sites (Caltrans 2021). The Development Sites are not visible from these highways so the Project will not damage scenic resources or affect a scenic highway and no mitigation is required.

NO IMPACT

c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

(c-d) The Project site is located within an urban area with a variety of urban land uses such as commercial, office, and residential land uses. A project is generally considered to have a significant visual/aesthetic impact if it substantially changes the character of an area such that it becomes visually incompatible or degrades the existing context and quality of the site and its surroundings. Depending on the location of the light source and its proximity to adjacent light-sensitive uses, light introduction may become a nuisance, affecting adjacent areas and diminishing the view of the clear night sky. Light spillage is typically defined as unwanted illumination from light fixtures on adjacent properties.

The SPA proposes a ten-foot increase in maximum permissible building heights for a Sub-area of the SHSP so its effects on visual quality or light and glare will be minimal (i.e., taller buildings and their lighting will be more visible within a limited urbanized area). Slightly taller buildings will also incrementally increase shading and shadows on adjacent non-residential properties to the north, east, and west. However, the overall effect of a ten-foot increase in building heights will not significantly increase shade or shadow impacts on adjacent properties which are all non-residential in nature. With approval of the SPA, future development will be consistent with zoning (i.e., the SHSP) and its design guidelines relative to scenic quality. Consistent with the conclusions of the SHSP EIR, impacts of the SPA related to visual character or quality and lighting and glare will therefore be less than significant and no programmatic mitigation is required.

The Project will develop/redevelop approximately 5.35 acres of the 120-acre SHSP within a highly urbanized area. The Project will modernize the overall appearance of the buildings while maintaining their historical architecture (first floor brick facades).

The Project proposes two buildings with maximum heights of 59’ 6” and lighting from these buildings will be incrementally more visible in the surrounding (highly urbanized) area. With approval of the SPA, the Project will be consistent with design aspects of the SHSP including lighting limitations. Though the proposed Project will create new sources of nighttime light and glare, due to its setting, even the increased heights of the Project buildings over the current SHSP standards will not be significant in terms of lighting and glare impacts due to similar types of buildings in the surrounding area. Views of the taller Project buildings will not create substantial light or glare and will not result in adverse visual impacts during either the day or night. Therefore, the Project will not significantly degrade the visual character of the site and its surroundings, or create a new source of substantial light or glare that will adversely affect daytime or nighttime views in the area. Impacts will be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. Regarding cumulative impacts, the SPA Sub-area occupies 30 acres or 15% of the 120-acre SHSP area and 0.8% of the 3,495 acres occupied by the City as a whole. The potential increase in overall building height within the SHSHP Sub-area (from 50 to 60 feet), including the proposed height increase of the two Project buildings (to 59.5 feet from 50 feet), would represent an incremental and less than significant cumulative aesthetic impact within the City relative to scenic vistas, scenic resources, scenic highways, or light and glare. No mitigation would be required for the SPA or the Development Project regarding aesthetic impacts.

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

The State of California considers agriculture an important environmental resource and the California Resources Agency monitors the distribution of agricultural land throughout the state. Forestry is also an important type of agricultural activity in the state which is monitored by the California Department of Forestry and Fire Protection. The Project area is located in the Los Angeles (LA) Basin, which once supported agriculture and forest resources but now is highly urbanized and has very limited agriculture and no identified forest resources.

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

(a-e) According to the Farmland Mapping and Monitoring Program of the California Resources Agency (FMMP 2021), there are no prime or other important farmland designations, forest land or forest-related zoning within City limits which includes the SHSP. Therefore, the proposed SPA would have no impacts in that regard and no programmatic mitigation is required.

Maps produced by the CalFire Forest and Range Assessment Project (FRAP 2021) indicate the City and SHSP are in an urbanized area with no forest resources. According to the City General Plan Land Use Element and Zoning Map, the City contains no agricultural or forest-related land use or zoning designations. In addition, there is no land in the City under a Williamson Act contract (agricultural preserve). These conclusions are supported by both the GP EIR and the SHSP EIR. Therefore, the proposed development of the Project will have no impacts on any agricultural or forest resources. No mitigation is required.

NO IMPACT

Cumulative Impacts. The SPA Sub-area, including the Project Development Sites, contain any agricultural or forest resources. Therefore, neither the SPA or the Development Sites will have any cumulative impacts relative to agricultural or forest resources.

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

Air quality is one of the most serious risks to human health in the South Coast Air Basin (SCAG) which has generally had poor air quality for many decades. Air quality is monitored and managed by both the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and to meet the standards.

A detailed Air Quality Assessment was prepared for the Project (MIG 2021a)*(*Appendix B*)*. The proposed Project is located within the Los Angeles Basin which is highly urbanized and has generally poor air quality much of the year. Air pollutants are generated by a variety of stationary and mobile sources and air quality is still often unhealthy despite decades of state and regional regulations. New development is evaluated to determine if or to what degree measures should be implemented to reduce air pollution and protect public health.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

SCAB is designated as nonattainment for the federal and state 1-hour and 8-hour ozone standards, the state PM_{10} standards, and the federal and state $PM_{2.5}$ standards, and the Los Angeles County portion of SCAB is also designated as nonattainment for federal lead standards. The SCAQMD adopted its most recent Air Quality Management Plan (AQMP) in 2016 which includes strategies for the attainment of state and federal air quality standards.

The SPA requests a ten-foot increase in maximum permissible building heights within in a Sub-area of the SHSP to allow for more architectural flexibility in adapting older industrial

buildings to modern standards. This change in maximum allowed height would not, in and of itself, result in any increase in development potential that was not anticipated in the General Plan or SHSP and its EIR. Therefore, it would have no effect on consistency with the 2016 AQMP which was based on the City's General Plan land uses adopted in 2016. For that reason, the SPA would therefore have no impact relative to the AQMP and no programmatic mitigation is required.

Regarding the proposed Standard Works Project, the SCAQMD concludes a project that conflicts with or obstructs the implementation of the South Coast Air Basin 2016 Air Quality Management Plan (AQMP) if it could hinder implementation of the AQMP, could delay efforts to meet attainment deadlines, and/or interfere with SCAQMD efforts to maintain compliance with, and attainment of, applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993), a project is consistent with the AQMP if: (1) it is consistent with the growth assumptions in the AQMP; and (2) it does not increase the frequency or severity of an air quality standards violation or cause a new one.

The proposed Project would not induce population growth because it involves non-residential development, and the employment induced by the Project would be well within that accounted for in the City's General Plan and the Southern California Association of Governments 2016 Regional Transportation Plan / Sustainable Communities Strategy (2016 RTP/SCS), which formed the growth assumptions for the AQMP.[2] Therefore, the proposed Project would not conflict with the first AQMP consistency criterion. As described in the analysis in Section 3.b below, the Project would not exceed the construction or operational air quality thresholds maintained by the SCAQMD. Therefore, the Project would not conflict with or obstruct implementation of the SCAQMD 2016 AQMP (SCAQMD 2017). Impacts are less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The following section provides the calculated potential air emissions associated with the construction and operations of the Project and compares the emissions to the SCAQMD CEQA thresholds of significance. As recommended by SCAQMD, the California Emissions Estimation Model (CalEEMod) was used to calculate the Project construction and operational emissions for volatile organic compounds (VOC), oxides of nitrogen (NOx), carbon monoxide (CO), sulfur dioxide (SO_2), large particulates (PM_{10}), and fine particulates ($PM_{2.5}$).

The SPA requests a ten-foot increase in maximum permissible building heights for more architectural flexibility within a Sub-area of the SHSP but no other development changes such as land use or intensity of use (FAR). Any increased building height under the SPA would not result in any additional ground disturbance (i.e., project footprint) and no increase in FAR or overall development, so it will have no demonstrable effect on the emission of small particulate material during construction or operation. Therefore, the SPA would have no effect (i.e., no increase or decrease) of any air pollutant emissions for which the Basin is

[2] The 2016 RTP/SCS accounted for 7,000 new jobs being formed in the City between 2012 and 2040 (SCAG, 2016).

in non-attainment (ozone and $PM_{2.5}$). The SPA would have no impacts in this regard so no programmatic mitigation is required.

An air quality assessment was prepared for the Project by MIG in August 2021 which examined criteria air pollutant emission impacts of Project construction and operation. The proposed Project's potential construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version (V.) 2020.4.0. Construction phase and duration and the type and amount of equipment used during construction were generated using CalEEMod default assumptions and modified as necessary to reflect the following Project-specific context, information, and details: the type and length of construction phases for each site, as well as the equipment used in each phase, was modified per information provided by the Project applicant; 600 cubic yards of soil was assumed to be exported from each site; and fugitive dust control measures were incorporated into the model consistent with requirements contained in SCAQMD Rule 403, Fugitive Dust.

The proposed Project's operational emissions from area, energy use, and mobile sources were estimated also using CalEEMod, V. 2020.4.0. The modeling was based on the proposed Project's first full year of operations (assumed to be 2023 for the North Site and 2024 for the South Site), using default data assumptions generated by CalEEMod, modified as necessary to reflect the following Project-specific context, information, and details: Project-specific land use information (i.e., lot acreage, building square footage, etc.) was applied to the model; and CalEEMod default weekday trip generation rates were replaced with the trip generation and vehicle miles travelled information contained in the Focused Traffic Analysis Memorandum (Kimley-Horn, 2021) and VMT memorandum (Translutions, 2021) prepared for the proposed Project.

For the Project, an air quality assessment prepared by MIG in August 2021 indicates its "worst case" daily air pollutant emissions would not exceed standards established by the SCAQMD during either construction or operations, as indicated in Tables 4 and 5 (MIG 2021a).

Table 4: Project Emissions - Construction

Emission Condition	Maximum Pollutant Emissions (pounds per day)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Highest Daily Emissions[1]	13.0	47.2	50.8	0.1	5.9	3.8
SCAQMD Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Table 3, MIG 2021a
[1] unmitigated maximum daily emissions from construction at one or both sites in summer or winter, whichever is highest

Table 5: Project Emissions - Operations

Emission Condition	Maximum Pollutant Emissions (pounds per day)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Highest Daily Emissions[1]	7.7	4.2	42.9	0.2	8.5	2.1
SCAQMD	55	55	550	150	150	55

Threshold						
Exceeds Threshold?	No	No	No	No	No	No

Source: Table 4, MIG 2021a

[1] unmitigated daily regional emissions from operations (area-wide, energy, and mobile sources) at both sites in summer or winter rates, whichever is highest and minus emissions from existing uses ("worst case")

The air quality assessment utilized the latest SCAQMD software and Project characteristics to estimate both short-term and long-term emissions. Since the worst case emissions were determined to be less than the SCAQMD's established thresholds, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment. Impacts are considered less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

(c-d) Some land uses are considered more sensitive to air pollution than others because of the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases. Residential areas are considered to be sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Children are considered more susceptible to the health effects of air pollution due to their immature immune systems and developing organs. As such, schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution.

The SPA requests a ten-foot increase in maximum permissible building heights in a Sub-area of the SHSP but no other development changes that affect land use or intensity of use (FAR). Any increased building height under the SPA would not result in any additional ground disturbance (i.e., project footprint) and no increase in FAR or overall development, so it will have no demonstrable effect on the emission of small particulate material during construction or operation. Therefore, the SPA would have no effect (i.e., no increase or decrease) of any air pollutant emissions for which the Basin is in non-attainment (ozone and $PM_{2.5}$). The SPA would have no impacts in this regard so no programmatic mitigation is required.

The air quality assessment prepared for the Project by MIG in August 2021 also examined localized impacts of Project air pollutant emissions on nearby sensitive receptors (e.g., parks, schools, hospitals and other uses with children, the elderly, sick, etc.). The assessment used the SCAQMD's Local Significance Thresholds (LSTs) that represent the maximum emissions from a project that are expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, which would result in significant adverse localized air quality impacts. The proposed Project's potential construction emissions were estimated using the California Emissions

Estimator Model (CalEEMod), Version (V.) 2020.4.0. Construction phase and duration and the type and amount of equipment used during construction were generated using CalEEMod default assumptions and modified as necessary to reflect the following Project-specific context, information, and details: the type and length of construction phases for each site, as well as the equipment used in each phase, was modified per information provided by the Project applicant; 600 cubic yards of soil was assumed to be exported from each site; and fugitive dust control measures were incorporated into the model consistent with requirements contained in SCAQMD Rule 403, Fugitive Dust. The proposed Project's maximum daily construction emissions were then compared against the SCAQMD's-recommended LST thresholds.

The air quality assessment indicated the closest potential sensitive air quality receptors to the perimeter of the proposed Project area (i.e., within 1,000 feet) include: (1) the multi-family residential developments on East Grand Ave, approximately 600 feet north of the North Site of the proposed Project area; (2) Chevron Park, approximately 150 feet south of the South Site of the proposed Project area; and (3) Wyle Park, approximately 1,000 feet west of the North and South Sites of the proposed Project area.

The SCAQMD has several ways of determining potential impacts on sensitive receptors. The first is the use of Localized Significance Thresholds (LSTs). Table 6 presents the reasonable worst-case estimate of pollution from Project construction on sensitive receptors based on LSTs. Table 6 demonstrates that Project emissions will not exceed established SCAQMD LST thresholds for short-term emissions during construction.

Table 6: Localized Significance Thresholds - Project Construction

Emission Condition	Maximum Pollutant Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Highest Daily Emissions[1]	40.3	47.6	4.8	3.4
SCAQMD LST Threshold	139	2,228	56	21
Exceeds Threshold?	No	No	No	No

Source: Table 5, MIG 2021a

[1] unmitigated maximum daily emissions from construction at one or both sites in summer or winter, whichever is highest ("worst case")

The second way to evaluate sensitive receptors is to examine emissions of Hazardous Air Pollutants (HAPs) or Toxic Air Contaminants (TACs). These pollutants can cause severe health effects at very low concentrations (non-cancer effects), and many are suspected or confirmed carcinogens (i.e., can cause cancer). People exposed to HAPs/TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects may include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and/or other health problems.

A portion of the PM_{10} and $PM_{2.5}$ emissions generated during construction of the Project would be diesel particulate matter, or DPM, a known TAC. The proposed Project's construction activities would not expose adjacent residential receptors to substantial levels of DPM and therefore not pose a substantial adverse health risk for several reasons. First, the proposed Project does not involve substantial earthmoving or grading activities that

would require large amounts of heavy-duty equipment associated with the highest DPM emissions. Second, construction activities associated with the Project would be short-term (as estimated in CalEEMod, total Project construction is estimated to last approximately six months). Finally, potential long-term adverse health risks from DPM are evaluated assuming a constant exposure to emissions over a 70-year lifetime, 24 hours a day, seven days a week, with increased risks generally associated with increased proximity to emissions sources. Since construction activities would only generate DPM emissions on an intermittent, short-term basis, DPM emissions from construction activities would be unlikely to result in adverse long-term health effects to existing sensitive receptors that exceed the SCAQMD's significance criteria.[3]

Finally, the SCAQMD CEQA Air Quality Handbook indicates that land uses associated with odor emissions and complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

Based on this analysis, the Project would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people (including sensitive receptors). Impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA will not result in the potential for any increase in overall development (FAR or total square footage) within the Sub-area but only an increase in building heights. These changes would not affect the emission of air pollutants during construction since no additional land would be impacted, and the level of operation of new development would not increase simply due to being housed in a taller building. Therefore, the SPA would not result in any cumulative air quality impacts relative to AQMP consistency, emission of criteria pollutants, emissions affecting sensitive receptors, or odors and other emissions.

The air quality assessment for proposed Development Project determined it would have less than significant impacts related to AQMP consistency, emission of criteria pollutants, emissions affecting sensitive receptors, or odors and other emissions. According to the SCAQMD, a project that is consistent with the AQMP and does not emit air pollutants in excess of its daily regional and localized standards does not have any cumulatively considerable air quality impacts. The air quality assessment determined the proposed Development Project had less than significant air pollutant emissions and was consistent with the AQMP even without any project-level mitigation. Therefore, the Project will not have cumulative air quality impacts.

[3] The SCAQMD has established the following thresholds of significance for projects that generate TAC emissions: Maximum Incremental Cancer Risk ≥ 10 in 1 million; Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million); Chronic & Acute Hazard Index ≥ 1.0 (project increment).

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	■
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	■	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

Biological resources are considered important aspects of the environment in California which are monitored and managed by the California Department of Fish and Wildlife (CDFW) under the State Endangered Species Act and State Fish and Game Codes. The Project area has low biological diversity and ecological sensitivity due to its urban conditions.

The greater Los Angeles region and Project area once supported extensive native vegetation and wildlife but now is highly urbanized and natural habitat is limited despite proximity to the Pacific Ocean. The Project area contains no natural drainages or habitat other than landscaping and street trees. The limited plant and animal species that are present in the surrounding area must be tolerant of human activity.

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The Project Site does not contain any natural vegetation, natural communities, or biological resources that could support any sensitive plants or wildlife species. The property is not in an area designated as critical habitat for any sensitive wildlife species, nor is the area subject to any conservation plans, recovery plans, or similar policies and ordinances. There are no wetlands, marshes, surface drainages, ponds, lakes, streams, or any type of water-based habitat or any riparian communities on or near the Project site.

The proposed SPA would allow taller buildings in the future compared to the existing SHSP. However, these development characteristics have no influence on nor are they affected by biological resources, and the SHSP EIR determined the SHSP area contains no significant biological resources. Therefore, the proposed SHSPA will have no impacts on habitats or to listed or otherwise sensitive species, consistent with the conclusions of the SHSP EIR, and no programmatic mitigation is required.

The Project Site contains no native vegetation or habitat for listed, candidate, or otherwise sensitive species, although there are a number of street trees and landscaping at present and proposed as part of development of the Project. Street trees may support nesting or otherwise sensitive bird species. Construction work during the bird nesting season (February 1 to August 31) may impact protected birds, so the proposed Project will be subject to Mitigation Measures 7-1 and 7-2 from the SHSP EIR as outlined below. With implementation of these measures, the Project will have less than significant impacts on any species identified as a candidate, sensitive, or special status species.

Mitigation Measures. The SHSP EIR contains the following mitigation measures (MM) to avoid impacts related to listed or otherwise sensitive biological species:

BIO MM 7-1 To avoid impacts to nesting birds, construction activities and construction noise should occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occurs within the avian nesting season (during the period from February 1 to September 1), areas within 100 feet of a development site shall be thoroughly surveyed for the presence of nests by a qualified biologist no more than five days before commencement of any vegetation removal. If it is determined that the Project

Site is occupied by nesting birds covered under the Migratory Bird Treaty Act, mitigation measure 7-2 shall apply.

BIO MM 7-2 If pre-construction nesting bird surveys result in the location of active nests, no grading, vegetation removal, or heavy equipment activity shall take place within an appropriate setback from occupied nests as determined by a qualified biologist. Protective measures (e.g., established setbacks) shall be required to ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code requirements. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts occur. A report of the findings, prepared by a qualified biologist, shall be submitted to the CDFW prior to construction-related activities that have the potential to disturb any active nests during the nesting season.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

(b-c) As previously indicated, there are no wetlands, marshes, surface drainages, ponds, lakes, streams, or any type of water-based habitat or any riparian communities on or near the Project site.

The proposed SPA would allow taller buildings in the future compared to the existing SHSP. However, these development characteristics have no influence on nor are they affected by biological resources, and the SHSP EIR determined the SHSP area contains no wetlands or related resources such as riparian habitat or other sensitive natural community. Therefore, the proposed SHSPA will have no impacts regarding these resources and no programmatic mitigation is required.

The Project Site contains no wetlands or related resources such as riparian habitat or other sensitive natural community. This conclusion is consistent with the results of the SPSH EIR. Therefore, the proposed Project will have no impacts regarding these resources and no mitigation is required.

NO IMPACT

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

There are no wetlands, marshes, surface drainages, ponds, lakes, streams, or any type of water-based habitat or any riparian communities on or near the Project site. No food or water sources are onsite or in the surrounding areas that would support migrating fish or wildlife.

The proposed SPA only affects building height and would have no influence on or be affected by wildlife movement. In addition, the SHSP EIR concluded the SHSP area

contains no wildlife movement or migratory corridors. Therefore, the proposed SHSPA will have no impacts in this regard and no programmatic mitigation is required.

The Development Sites are within the SHSP and also do not contain any natural drainages or channels, and no natural or vacant areas in or adjacent to the Development Sites that could function as a wildlife movement corridor. However, the Development Sites will have landscaping and street trees which may support various species of migratory birds. Therefore, consistent with the SHSP EIR, **Mitigation Measures 7-1 and 7-2** are recommended for the Project development to reduce potential impacts related to migratory birds to less than significant levels (See sub-section 4.a above).

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The SHSP would permit new development or activities such as the removal or maintenance of certain street trees protected by the El Segundo Street Tree Ordinance (Municipal Code Title 9, Chapter 3, Street Trees). The EIR stated that public projects would be governed by criteria in the ordinance, and private persons would be required to obtain a permit and replace removed street trees pursuant to the ordinance. The SPA would only change the maximum permissible height of some buildings so it would have no impact regarding conflicts with local policies or ordinances protecting biological resources and no programmatic mitigation is required.

Development of the two Development Sites will remove existing landscaping, mainly shrubs, in the existing planters along the south side of the South Side (facing El Segundo Boulevard) and the north side of the North Site (facing Franklin Avenue). These landscaping materials are covered by the City's Street Tree Ordinance. The proposed Project will replace landscaping materials lost by Project construction and install extensive new landscaping, including a number of new trees in the common areas of the two sites, per the Project landscaping plans and as approved by the City through the development review process. No other City ordinances or regulations are related to biological resources or that affect the Project properties so impacts are less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The Project site is a disturbed site with no existing natural vegetation. Although there are areas within El Segundo that contain sensitive habitat, they are located in coastal areas such as the coastal habitat for the El Segundo Blue Butterfly (ESBB). As described in the General Plan Conservation Element, the ESBB is listed on the federal endangered species list and is dependent upon native coastal buckwheat plants which are not present in the Project area. At this time, the butterfly occurs only on a 1.96 acre preserve adjacent to and maintained by the Chevron Refinery and in the dune area under the flight path of the Los Angeles International Airport.

Relative to the SPA, the SHSP EIR indicated there were no established Habitat Conservation Plans or Natural Community Conservation Plans within or adjacent to the

SHSP. In addition, none have been approved since the SHSP was approved. Therefore, the proposed SPA would have no impact and no programmatic mitigation was required.

At this time there are no HCPs or NCCPs that affect the Development Sites since they are part of the SHSP, so there are no impacts in this regard and no mitigation required.

NO IMPACT

Cumulative Impacts. The SPA Sub-area, including the Development Project sites, does not contain any significant biological resources, habitat or natural drainages, habitat conservation plans, and does not support any listed or otherwise sensitive species of plants or animals to any significant degree. The SPA would allow for increased maximum building heights within the Sub-area from 50 to 60 feet, which would have no demonstrable effect on biological resources or species. The Development sites similarly contain no biological resources. Therefore, the SPA and the Development Project will not make any significant contributions to cumulatively considerable regional impacts to biological resources.

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	■	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	■	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	■	☐	☐

The LA Basin has been inhabited for thousands of years by Native American tribes and for over two hundred years by European settlements. Although highly urbanized, it is still possible that archaeological or historical artifacts or even human remains may be found during excavation in native soils in this area.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

A historical resource is defined in CEQA Guidelines Section 15064.5(a)(3) as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period, or method of construction; representing the work of an important creative individual; or possessing high artistic values.

The proposed SPA would allow for increased building heights, however, individual projects would still be required to comply with CEQA, federal and state laws regarding historical resources, and the City's development review process which requires further evaluation if potentially significant historic buildings are present. Therefore, the SPA will have less than significant impacts regarding historical buildings and no programmatic mitigation is required.

The SHSP EIR indicated that some buildings within the SHSP area were over 50 years in age and may have the potential to be considered as a historic resource if they meet local, state, or national criteria for inclusion on a historic register. Any work on a building or structure that meets the criteria to be considered a historic resource could result in significant impact under CEQA if proper treatment does not occur.

The SHSP EIR concluded that implementation of Mitigation Measure MM 8-1 would reduce this potential impact to a less than significant level. The SHSP EIR contains Mitigation Measure 8-1 which requires an historical assessment of any buildings 50 years old or greater (see previous Table 3, Smoky Hollow Specific Plan Mitigation Measures).

The two existing buildings on the Development Sites are both over 50 years old. The Project applicant retained GPA Consulting (GPA) to prepare historical assessments of both Development Sites per applicable guidelines and standards (see Appendix E). The South Site was evaluated in September 2020 and updated in June 2021 while the North Site was evaluated in May 2019 as part of a parking structure that has since been built on that property (140 Oregon Street) before a parcel consolidation. That report was updated in June 2021 in conjunction with the current Project application (GPA 2021a+b).

The GPA assessments concluded that none of the buildings on the Development Sites would be eligible for listing in the California Register under Criteria 1, 2, 3, and 4 due to lack of association with a historic context. Additionally, the resources were evaluated in accordance with Section 15064.5(a)(2)–(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of California Public Resources Code, and they are not considered historical resources for the purposes of CEQA (GPA 2021a+b). These reports meet the requirements of SHSP EIR Mitigation Measure 8-1. The GPA reports demonstrate that Project impacts to historic resources will be less than significant and no Project-specific mitigation is required.

LESS THAN SIGNIFICANT IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

An archaeological resource is defined in Section 15064.5(c) of the CEQA Guidelines as a site, area, or place determined to be historically significant as defined in Section 15064.5(a) (see definition of historical resource in checklist response 14.a) or as a unique archaeological resource defined in Public Resources Code Section 21083.2 as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest, or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically recognized important prehistoric or historic event or person.

The proposed SPA would only increase the maximum allowable deviation to building heights. However, future development would still be required to comply with CEQA, federal and state laws regarding archaeological and/or tribal resources, including consultation, and the City's development review process. Therefore, the SPA will have less than significant impacts regarding archaeological resources and no mitigation is required. The SPA will therefore have no impacts on archaeological resources and no programmatic mitigation is required.

The Project will develop two sites (North and South) within the Project area. Although minimal grading is required to redevelop the existing onsite buildings, there is the potential that archeological resources may be found on the Development Sites. Since the SHSP EIR indicated archaeological resources may be present due to the region's long occupation by Native American tribes, there is the potential that archeological resources could be impacted during grading. However, implementation of **Mitigation Measures CUL MM 8-2 and CUL MM 8-3 from the SHSP EIR** (shown below) would reduce potential impacts to

archaeological (and/or paleontological) resources from grading on the Development Sites to less than significant levels:

CUL MM 8-2 Prior to the commencement of grading or demolition of subsurface structures, a professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards, shall conduct a brief archaeological and paleontological informational session for construction personnel. The training session may consist of an in-person meeting or a written handout describing: (1) how to identify archaeological and paleontological resources that may be encountered during earth-moving activities and (2) the procedures to be followed in such an event, including contact information for the appropriate entities if archaeological or paleontological resources are discovered.

CUL MM 8-3 In the event that archaeological or paleontological resources are unearthed during ground-disturbing activities, the ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find, where construction activities will not be allowed to continue until a qualified archaeologist or paleontologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Work shall be allowed to continue outside the buffer area. If the archaeologist identifies the find as a tribal cultural resource or suspects it to be a tribal cultural resource, the City will contact the Native American Heritage Commission (NAHC) to report the discovery, and will contact local Native American tribal representatives as directed by the NAHC. Should the newly discovered artifact(s) be determined to be a tribal cultural resource, Native American construction monitoring will be initiated. The City shall coordinate with the archaeologist and tribal representative(s) to develop an appropriate treatment plan for the resources.

Implementation of Mitigation Measures CUL MM 8-2 and CUL MM 8-3 as outlined above will also reduce potential impacts of the Project on archaeological resources to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Based on the fully developed conditions on the site and the extent of disturbance on the entire property and surrounding areas, there is little likelihood that construction would encounter and impact any human remains.

The proposed SPA would increase the maximum allowable building heights. However, future development would still be required to comply with state law (i.e., Health and Safety Code Section 7050.5) regarding human remains if found during grading. With regulatory compliance, the SHSPA will have less than significant impacts regarding human remains and no programmatic mitigation is required.

During grading of the Development Site, it is at least possible human remains could be discovered. In addition to Mitigation Measure CUL MM 8-3, the following measure is recommended to be consistent with state law.

CUL MM 8-4 If human remains are uncovered during Project grading, work must be halted in the immediate area of the find and the County Coroner notified in

accordance with Health and Safety Code Section 7050.5. The Coroner must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of a Native American, they must contact the Native American Heritage Commission for further investigations and proper recovery of such remains, if necessary. Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "most likely descendant". The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Human remains from other ethnic/cultural groups with recognized historical associations to the area shall also be subject to consultation between appropriate representatives from that group and the local jurisdiction/lead agency involved. This measure shall be implemented to the satisfaction of the City Planning Department.

Human remains that are Native American in origin are protected by a number of federal and state laws, and local tribal representatives must be consulted if such remains are found during grading. While the potential for finding human remains during grading on the Project site is considered low, compliance with Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, as specified in Mitigation Measure MM CUL-4, will reduce potential impacts to less than significant levels and no mitigation is required.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Cumulative Impacts. The SPA addresses only building heights within the SPA Sub-area and will not increase FAR, new building footprints, or total allowable building area of new development. Therefore, it will have no impact on construction activities that could disturb previously unknown cultural resources. In addition, the Development Project proposes no increase in FAR or overall square footage of development which could disturb cultural resources. Therefore, the SPA and Development Project will not contribute to any cumulative impacts regarding cultural resources, including the discovery of any human remains.

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	■	☐

The extensive urban uses and people in the LA Basin, including existing uses on the Development Sites, utilize a variety of energy resources for transportation, heating and cooling homes and businesses, and normal daily activities. State laws and regulations require efficient use of energy resources which still largely rely on non-renewable fossil fuels.

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

(a-b) The proposed SPA would allow for a ten-foot increase in maximum permissible building heights within the SPA Sub-area. However, individual projects would still be required to comply with CEQA, federal and state laws regarding energy use and conservation, and the City's development review process. Therefore, the SPA will have less than significant impacts regarding the two energy-related significance thresholds, unnecessary consumption of energy and consistency with energy conservation plans, and no programmatic mitigation is required.

The proposed Project consists of the redevelopment of two existing light industrial buildings and a detailed energy analysis was prepared for the Project (MIG 2021a)(Appendix B). Construction activities associated with the Project would require the use of heavy-duty, off-road equipment and construction-related vehicle trips that would combust fuel, primarily diesel and gasoline. Heavy-duty construction equipment would be required to comply with CARB's airborne toxic control measures which restricts heavy-duty diesel vehicle idling to five minutes, installing particulate filters on older trucks, etc. It is noted that the design of the Project includes several features that reduce GHG emissions compared to typical new construction activities. For example, the proposed exterior façade consists of concrete masonry blocks with no exterior or interior finishes that eliminates the need to use and transport other materials such as drywall, drywall mud and tape, sheathing, etc. The Project

would also incorporate structural features into its design, avoiding the need to manufacture, transport, and install materials intended to hide or cover structural elements.

Once operational, the proposed Project would consume energy for vehicle trips, electricity and natural gas usage, and water and wastewater conveyance. As estimated using CalEEMod, the Project would consume approximately 1,371 million British thermal units (MMBTU) and1,679 megawatt-hours (mWh) per year. In addition, the Project is also estimated to result in a total of approximately three (3) million annual VMT which, based on the average gasoline fuel efficiency in the Los Angeles County basin, would consume approximately 133,694 gallons of gasoline.[4]

Electricity, natural gas, and gasoline fuel consumption are energy sources necessary to operate and maintain the Project in a safe manner. Lighting is essential for safety and security and natural gas consumption is needed for heating and other temperature-controlled activities. Due to energy efficiency standards being improved over time, the new structures would be more efficient in its energy consumption than the existing structures. For mobile sources, the Project includes mitigation to reduce VMT and fuel consumption (see sub-section 17, Transportation). In addition, the SHSP EIR found that the SHSP would not conflict with the California Air Resources Board (CARB) Scoping Plan, the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS, now called “Connect SoCal”), or the City’s EECAP as these plans relate to energy conservation and efficiency.

As a part of the SHSP, the Project would not conflict with or obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. As discussed above, the proposed Project would be built to the latest CALGreen Code and would be more energy efficient than the existing structures at the site and would not conflict with or obstruct a state or local plan for renewable energy. For these reasons, the proposed Project would not result in the wasteful, inefficient, or unnecessary use of energy resources. Impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA affects only building heights within the SPA Sub-area and will not change FAR or total building square footage of new development. Similarly the Development Project does not increase overall development on the Project sites. Development within the SPA, including the proposed Project, will comply with applicable regulations and plans regarding energy conservation. Therefore, the SPA and the Development Project will not contribute to significant cumulative impacts regarding energy.

[4] According to the Board of Equalization (BOE), statewide taxable sales figures indicate a total of 15,365 million gallons of gasoline fuel were sold in 2019 (CEC, 2021). Although exact estimates are not available by County, retail fuel outlet survey data indicates Los Angeles County accounted for approximately 23% of total statewide gasoline sales (CEC, 2020). Based on CARB’s EMFAC2017 web database, the overall average fuel economy for all gasoline vehicles in the Basin in year 2020 would be 22.7 miles per gallon.

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	■	☐
2. Strong seismic ground shaking?	☐	■	☐	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	■	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	■	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	■	☐	☐

Southern California contains many earthquake faults as well as localized geologic and soil constraints. New development must be assessed to assure these various earth-related constraints do not affect human health and safety. The area may also contain fossils or other paleontological resources that can be impacted by Project grading in native soils.

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 serves to mitigate the hazard of surface faulting to structures for human occupancy and is intended to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults and to issue maps delineating these zones. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The Act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years. The City is located in a seismically active region in Southern California near several fault systems.

Both the GP EIR and the SHSP EIR indicate there are no active faults beneath or adjacent to the SHSP or the Project Sites. Therefore, there are no impacts and no programmatic mitigation required.

The Development Sites are not underlain by or adjacent to any active faults or fault zones as outlined in the SHSP EIR. The Project is located in the northern portion of the Peninsular Ranges geomorphic province which is characterized by many active, potentially active, and inactive faults, although the site is not within a state-designated Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards (CGS, 2017). In addition, no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Development Sites. Therefore, there are no impacts and no mitigation is required.

NO IMPACT

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Ground shaking is the primary cause of structural damage during an earthquake. Magnitude, duration, and vibration frequency from earthquakes would vary greatly, depending on the fault and its distance from the Project Site.

The SPA allows for up to ten feet of additional building height within the SPA Subarea. The SPA Sub-area could experience moderate to strong ground shaking. All future development within the SHSP area must comply with the stringent seismic design provisions of the latest California State Building Code, as adopted by the City and be required to document seismic compliance with a geotechnical study which will addresses specific project design on a specific site. This compliance will help reduce potential programmatic risks of property loss or hazards to occupants relative to the SPA to a less than significant level and no programmatic mitigation is required.

The Development Sites, as part of the SHSP area, could experience strong seismic ground shaking and related effects in the event of an earthquake on one of the identified active or potentially active faults in the region (SHSP DEIR Table 9-1). The Project Site is underlain by Pleistocene age older dune sand deposits, referred to as the El Segundo Sand Hills, which consist primarily of dense, poorly graded sand (p. 4, GWI 2017)(Appendix F). The Project geotech study estimates the Development Sites will be subject to a peak ground acceleration[5] of 0.6g (p. 6, GWI 2017). Due to the risks associated with strong ground shaking, implementation of **Mitigation Measure GEO-1** is recommended.

MM GEO-1 Prior to issuance of any grading or building permits, the applicant shall demonstrate that all improvements and construction-related activities comply with the recommendations outlined in the Project geotechnical report (CWI 2017). This measure applies to all potential geologic and soil constraints that could affect one or both sites, including but not limited to seismic ground failure, strong seismic shaking, differential settlement, liquefaction, lateral spreading, and subsidence, and landslides/slope stability as appropriate. This measure shall be implemented to the satisfaction of the City Engineer.

The Project will implement Mitigation Measure MM GEO-1 to ensure potential risks (impacts) to public health and safety, as well as building structural safety, from strong ground shaking will be reduced to less than significant levels.

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a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

(a.3 - a.4) Liquefaction is the transformation of a deposit of soil from a solid state to a liquefied state, typically during prolonged ground shaking events such as earthquakes, and the soil particles loose cohesion and allow both horizontal and vertical movement. The Project Site is characterized by relatively flat topography and no unusual geographic features exist on the site or in the vicinity.

Future buildings under the SPA may be up to ten feet taller than currently allowed within the SPA Sub-area. However, any future development would still be subject to the requirements of the SHSP, state building code seismic guidelines, and the City's development review process regarding geologic and soil constraints. Therefore, the proposed SPA would have less than significant impacts relative to ground rupture and strong seismic shaking and no programmatic mitigation is required.

The Project Site is part of the SHSP and new projects must prepare a site-specific geotechnical report to identify potential geologic and soil constraints for proposed development. A geotechnical study for the Development Sites was prepared by Geocon West in 2017 (Appendix F). The report evaluated potential risks from seismic ground failure, strong seismic shaking, differential settlement, liquefaction, lateral spreading, and subsidence, and landslides.

[5] 0.6g = 60% the force of gravity exerted horizontally

The State of California Seismic Hazard Zone Map for the Venice Quadrangle (CDMG 1999), which covers the Project Site, indicates it is not located in an area designated as having a potential for liquefaction. In addition, the County of Los Angeles Seismic Safety Element (Leighton 1990) indicates that the sites are not located in an area having a potential for liquefaction because the area is underlain by dense Pleistocene age dune sand deposits that are not prone to liquefaction. Also, the historic high groundwater levels in the area are greater than 40 feet beneath the ground surface. Based on this information, the Project geotechnical report concluded the potential for liquefaction and associated ground deformation beneath the sites was very low (p. 8, CWI 2017).

According to the County of Los Angeles Safety Element (Leighton 1990), the Development Sites are not within a "Hillside Area" or an area identified as having a potential for slope instability. Additionally, the Project Site is not within an area identified as having a potential for seismic slope instability (CDMG 1999). There are no known landslides near the Development Sites, therefore, the potential for slope stability hazards to adversely affect the proposed development is considered low (p. 8, CWI 2017).

LESS THAN SIGNIFICANT IMPACTLESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Unstable soil conditions could develop if exposed soils experience rain and wind erosion or disturbance by construction equipment. The Project would be subject to the requirements of a municipal National Pollutant Discharge Elimination System (NPDES) Permit implemented through a Standard Urban Stormwater Mitigation Plan (SUSMP) and the City's Municipal Code. Both the Municipal Code and the SUSMP require application of erosion and sedimentation control best management practices (BMPs) during construction for proper water quality management. Erosion control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment before it can travel offsite. The Project is also required to comply with South Coast Air Quality Management District (SCAQMD) Rule 403 which would reduce the potential for wind erosion by requiring dust control measures during construction.

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area. However, any future development would still be subject to state and local water quality and erosion control requirements. Therefore, the proposed SHSPA would have less than significant impacts relative to erosion or loss of topsoil and no programmatic mitigation is required.

For construction of the Development Sites, the Project applicant would be subject to the erosion control requirements of the Municipal NPDES Permit and the City's Municipal Code. Specifically, construction runoff is regulated by the NPDES Construction General Permit which requires identification of a variety of water quality control BMPs to be specified on construction plans and implemented throughout construction. Such BMP requirements may include, but would not be limited to, containing stormwater runoff on-site during rain events, limiting grading during the wet season, covering slopes susceptible to erosion, and retaining non-stormwater runoff, such as runoff from vehicle washing, on site. Through these existing, mandatory regulatory compliance measures, potential water quality impacts during construction would be avoided or reduced to less than significant levels and would avoid conflicts with water quality standards established by the Regional Water Quality Control Board.

In addition, long-term erosion-related impacts could result from operation of the completed Project. While the Project would generate stormwater runoff during Project operation, the proposed increased landscaping and infiltration design would reduce the volume of runoff compared with the existing Project site since the existing site is fully developed with impervious surfaces and minimal landscaping. Further, the Project would be required to have a stormwater management system that is designed to comply with the City's Low Impact Development (LID) requirements which state that the first flush (resulting from the 85th percentile annual rainstorm) which often contains sediment would need to be infiltrated in the soils via infiltration wells, captured in a cistern and treated for on-site re-use, or filtered through bio-retention planters and released. The Project proposes several onsite dry wells to accomplish this runoff treatment requirement.

Like any development within the SHSP, the proposed Project will be required to implement standard erosion control measures (ECMs) during both construction and operation, as documented in the Hydrology and LID studies prepared for the Project by Brandow and Johnston in 2018 and 2020 (Appendix G). To document compliance with various state, regional, and local water quality regulations, the Project is required to document how it will control short-term erosion during construction with a Storm Water Pollution Prevention Plan (SWPPP). In addition, the Project must comply with Municipal Code Section 5-4-9, Construction Activity Stormwater Measures which include BMPs as outlined in the Project water quality studies (Appendix G). Finally, the Project must document how it will control long-term erosion or water pollution during operation through implementation of a Water Quality Management Plan (WQMP). With these actions, the Project will have less than significant impacts related to erosion with implementation of standard regulatory compliance and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The Project Site has a relatively flat topography with no hillsides onsite or in the surrounding area. Further, the Project site is not located on a cliff, mountainside, bluff, or other geographic feature with stability concerns.

Future buildings under the SHSPA may be up to ten feet taller within the SPA Sub-area, but any future development would still be subject to the requirements of the SHSP and the City's development review process regarding geologic and soil constraints. Therefore, the proposed SPA would have less than significant impacts relative to unstable geologic or soil conditions and no programmatic mitigation is required.

The Development Sites are within the SHSP and the SHSP EIR indicated the SHSP would have no constraints relative to unstable geologic units. The site-specific geotechnical report considered the potential risks to the sites from landslides, lateral spreading, subsidence, liquefaction, or collapse to be relatively low (CWI 2017). Therefore, the proposed Project would have less than significant impacts relative to unstable geologic or soil conditions and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area. However, any future development would still be subject to the requirements of the Uniform Building Code regarding foundation design and soil stability, and the City's General Plan[6] and development review process regarding geologic and soil constraints. With implementation of regulatory compliance and General Plan Safety Element Goal PS2, future development under the proposed SPA would have less than significant impacts relative to expansive soils and no programmatic mitigation is required.

The Project-specific geotechnical report for the Development Sites stated that…"based on the predominantly granular nature of the soils encountered during site exploration, the soils are considered to be "non-expansive" (p. 13, CWI 2017). Impacts will be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but any future development would still be subject to the requirements of the SHSP and the City's development review process regarding geologic and soil constraints. In addition, the SHSP requires all new development to connect to the local sewer system. Therefore, the proposed SHSPA would have no impacts relative to septic or alternative wastewater systems and no programmatic mitigation is required.

The Development Sites will connect to the existing sewer system and so their development would also have no impacts related to septic tanks and soil limitations. The development plans for the Project indicate both sites will be connected to the local sewer system so there are no impacts relative to soil conditions and septic or alternative wastewater systems (Appendix A).

NO IMPACT

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project Site does not contain any unique geological features or formations and it has been highly disturbed so the potential for finding paleontological resources (fossil materials) is considered low. Future buildings under the SPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but any future development would still be subject to SHSP EIR Mitigation Measures CUL MM 8-2 and CUL MM 8-3 which require monitoring in the event paleontological resources are found during grading. Therefore, the proposed SPA would have no impacts relative to paleontological resources and no mitigation is required.

Regarding the Development Sites, the SHSP EIR stated there were no indications of unique paleontological resources within the SHSP area but it was possible that subsurface native soils could contain fossilized remains. Previous development activity has disturbed soils,

[6] Safety Element Goal PS2 with Program PS-2.1A and Policies PS2-2 and PS2.2A

and only grading that extends deeper than prior disturbance is likely to encounter fossilized resources. Contact with such resources during construction activities could result in significant impacts. The Development Sites are within the SHSP and implementation of Mitigation Measures CUL MM 8-2 and CUL MM 8-3 from the SHSP EIR would reduce potential impacts of any grading associated with developing the Development Sites to less than significant levels (as outlined in sub-section 5.b and as shown below).

CUL MM 8-2 Prior to the commencement of grading or demolition of subsurface structures, a professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards, shall conduct a brief archaeological and paleontological informational session for construction personnel. The training session may consist of an in-person meeting or a written handout describing: (1) how to identify archaeological and paleontological resources that may be encountered during earth-moving activities and (2) the procedures to be followed in such an event, including contact information for the appropriate entities if archaeological or paleontological resources are discovered.

CUL MM 8-3 In the event that archaeological or paleontological resources are unearthed during ground-disturbing activities, the ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find, where construction activities will not be allowed to continue until a qualified archaeologist or paleontologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Work shall be allowed to continue outside the buffer area. If the archaeologist identifies the find as a tribal cultural resource or suspects it to be a tribal cultural resource, the City will contact the Native American Heritage Commission (NAHC) to report the discovery, and will contact local Native American tribal representatives as directed by the NAHC. Should the newly discovered artifact(s) be determined to be a tribal cultural resource, Native American construction monitoring will be initiated. The City shall coordinate with the archaeologist and tribal representative(s) to develop an appropriate treatment plan for the resources.

With implementation of EIR Mitigation Measures CUL MM 8-2 and CUL MM 8-3, potential impacts of the Project on paleontological resources will be reduced to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Cumulative Impacts. The SPA only increases building heights and will not increase FAR or the total amount of development expected within the SPA Sub-area, nor will the Development Project increase FAR or the total amount of development on the Project site. The SPA and Development Project would therefore not increase potential risks to new development from geologic or soil constraints. All potential geological and soil-related impacts can be reduced to less than significant levels by careful design and regulatory compliance, and project-specific mitigation when needed similar to that recommended for the Development Project. Therefore, the SPA and the Development Project will not make any significant contributions to cumulatively considerable regional impacts related to geology, soils, or paleontological resources.

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	■	☐	☐

In recent years concerns have been raised about greenhouse gas (GHG) emissions like carbon dioxide and their influence on global warming and climate change. New development must be assessed to determine if its GHG emissions exceed established thresholds and if so what measures must implement to help incrementally reduce its GHG emissions.

a. Would the project generate Greenhouse Gas emissions, either directly or indirectly, that may have a significant impact on the environment?

A detailed GHG assessment was prepared for the Project (MIG 2021b)(Appendix B) in August 2021. The proposed SPA would allow for a ten-foot increase in maximum permissible building heights within the SPA Sub-area. However, individual projects would still be required to comply with CEQA, federal and state laws regarding energy use and conservation (and therefore air quality and GHG), state laws and regional regulations regarding air quality, and the City's development review process. Therefore, the SPA will have less than significant impacts regarding greenhouse gas emissions and no programmatic mitigation is required.

The Project would generate GHG emission from both short-term construction and long-term operational activities. A detailed GHG emissions assessment was prepared for the Project (MIG 2021b)(Appendix B). The assessment used the California Emissions Estimation Model (CalEEMod V. 2020.4.0) program recommended by SCAQMD to estimate construction and operational emissions using the same default assumptions and Project-specific variables applied to the air quality emissions estimates. Construction activities would cease to emit GHG upon completion, unlike operational emissions that would be continuous year after year. The SCAQMD recommends amortizing construction GHG emissions over a 30-year period and including with operational emissions estimates. This normalizes construction emissions so that they can be grouped with operational emissions and compared to appropriate thresholds, plans, etc. Once operational, the proposed Project would generate GHG emissions from area, stationary, mobile, water/wastewater, and solid waste sources.

Construction activities would generate GHG emissions primarily from equipment fuel combustion as well as worker, vendor, and haul trips to and from the Project site during demolition, site preparation, grading, building construction, paving, and architectural coating

activities. Construction activities would cease to emit GHG upon completion, unlike operational emissions that would be continuous year after year. The SCAQMD recommends amortizing construction GHG emissions over a 30-year period and including with operational emissions estimates. This normalizes construction emissions so that they can be combined with operational emissions and compared to appropriate thresholds, plans, etc. Once operational, the Project would generate GHG emissions from area, stationary, mobile, water/wastewater, and solid waste sources. The proposed Project's total operational GHG emissions are estimated to be 1,256 metric tons of CO_2 equivalents ($MTCO_2e$) per year (Table 6, MIG 2021a).

The Project's GHG Emissions Assessment concluded that the potential increase[7] in GHG emissions would be below both of the SCAQMD's recommended GHG emissions thresholds - the Tier 3 general land use threshold of 3,000 $MTCO_2e$ and the Tier 3 commercial use threshold of 1,400 $MTCO_2e$. In addition, the Project's GHG emissions would also be below an adjusted Project-specific GHG emissions goal of 1,800 $MTCO_2e$ per year which takes into account post 2020 GHG emissions targets towards which the state is currently working[8]. This emissions estimate is a "worst case" because it does not take into account any emission reductions associated with VMT mitigation (MM VMT-1 through VMT-6) included in the VMT memorandum prepared for the Project (Translutions 2021) as outlined in sub-section 17, Transportation. With the six recommended VMT mitigation measures, GHG emissions from the North Site (net increase of 556 $MTCO_2e$) and the South Site (net increase of 560 $MTCO_2e$) would total 1,116 $MTCO_2e$, or approximately 8% lower than the worst-case emissions estimate of 1,256 $MTCO_2e$. Therefore, the Project would not generate GHG emissions that exceed SCAQMD CEQA thresholds or otherwise result in a significant impact on the environment. Impacts are less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions. The City adopted the City of El Segundo Climate Action Plan (El Segundo CAP) in 2017 to help implement compliance with the City's GHG emissions reduction goals as well as State and federal regulations that include Assembly Bill (AB) 32 (Chapter 488, Statutes of 2006), Senate Bill (SB) 32 (Chapter 249, Statutes of 2016), and the 2017 Climate Change Scoping Plan Update GHG emission reduction goals. The El Segundo CAP was prepared in accordance with Section 15183.5(b) of the State CEQA Guidelines for qualified plans to support tiering for project level analyses, and states "Within the CEQA process, a qualified CAP framework offers the ability to streamline future CEQA greenhouse gas analyses by being able to tier off the climate action plan."

7 Net increase which takes into account "new" emissions from the Project minus emissions from the existing onsite uses

8 The 1,800 $MTCO_2e$ per year goal was developed by taking the SCAQMD's Tier 3 threshold of 3,000 $MTCO_2e$ per year, which was the threshold to reduce emissions back to 1990 levels, and reducing it by 40 percent (3,000 $MTCO_2e$/yr * (1 - 0.4) = 1,800 $MTCO_2e$/yr). This reduction is consistent with the GHG reductions required by year 2025 to meet GHG reductions required under Senate Bill 32 (to reduce GHG emissions to levels 40% below 1990 levels by 2030). This linear reduction approach oversimplifies the threshold development process. The City is not adopting nor proposing to use 1,800 $MTCO_2e$ as a CEQA GHG threshold for general use; rather, it is only intended for to provide additional context and information on the magnitude of this proposed Project's GHG emissions.

The proposed SPA would allow for a ten-foot increase in maximum permissible building heights within the SPA Sub-area. However, individual projects would still be required to comply with CEQA, federal and state laws regarding energy use and conservation (and therefore air quality and GHG), state laws and regional regulations regarding air quality, and the City's development review process. In addition, the SHSP EIR found the SHSP would not conflict with the California Air Resources Board (CARB) Scoping Plan, the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS), now called "Connect SoCal", or the City's EECAP. Therefore, the SPA will have less than significant impacts regarding consistency with applicable GHG plans and no programmatic mitigation is required.

Since the Project is a part of SHSP, its impacts would also be less than significant with implementation of the following mitigation measures from the EECAP recommended in the SHSP EIR.

EECAP 4.1 *Encourage or Require Energy Efficiency Standards Exceeding Title 24.* This measure will develop City staff to be resources in encouraging and implementing energy efficiency beyond that required by current Title 24 Standards.

EECAP 5.2 *Promote Water Efficiency Standards Exceeding SB X7-7.* In addition to SB X7-7, more actions are being studied or have been taken to exceed water efficiency standards. These efforts include education and outreach practices that could be combined with residential and commercial EECAP actions that emphasize the reuse of recycled/gray water and promote harvesting rainwater.

With implementation of Mitigation Measures EECAP 4.1 and 5.2, the Project is consistent with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Impacts will be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Cumulative Impacts. New development will result in the emission of greenhouse gases (GHGs) in the future. However, the SPA only increases building heights within the SPA Sub-area and would not result in increased FAR or total square footage of new development over that planned in the SHSP. In addition, the GHG study for the Development Project indicated it would generate less than significant levels of GHGs due to its type, size, project design and with implementation of GHG mitigation from the SHSP. The study also indicated the Project will be consistent with GHG regulatory plans. Therefore, the SPA and Development Project will not make significant contributions to regional GHG emissions and are consistent with GHG regulatory plans.

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	■	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	■	☐	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	■

The Project Site is situated in the highly urbanized Los Angeles Basin in which a vast array of hazardous materials are handled, stored, transported, and utilized on a daily basis, especially in medium and heavy industrial processes. New development must be evaluated to determine if it will affect or be affected by a variety of local hazards, including hazardous materials, either onsite or in the surrounding area. If hazards would threaten public health or safety, the development must implement appropriate measures to reduce potential risks.

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

In office settings, small amounts of commercially available hazardous materials may be used for regular cleaning and maintenance activities which would neither require the storage, use, or disposal of substantial amounts of hazardous materials, nor generate significant quantities of hazardous waste. This usage would not require the storage, use, transport, or disposal of quantities of hazardous substances that would be subject to any special handling or permitting requirements.

The SHSP does not directly address hazardous materials but the City's CEQA and planning review processes for future development within the SHSP will identify any potential issues regarding hazardous materials and/or contamination and recommend appropriate site- and project-specific mitigation. Therefore, the SPA will have less than significant impacts in this regard and no programmatic mitigation is required with standard regulatory compliance.

The Project is a part of the SHSP and proposes office and commercial-related uses consistent with the SHSP. The Project will likely utilize a range of commercial-grade hazardous materials for routine maintenance, manufacturing, cleaning, etc. These are likely to include paints, cleaning agents, etc. However, local businesses and the transportation of such materials must comply with various Federal and State regulations for the safe management of such materials. Although El Segundo Boulevard just south of the site is a designated truck route in the City, it is unlikely that transportation of hazardous materials along this route would significantly impact uses on the Development Sites. The amount and type of hazardous materials that future uses on these sites would store, transport, or use would be minimal, so impacts involving the routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation needed with standard regulatory compliance.

LESS THAN SIGNIFICANT IMPACT

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Based on the age of the buildings, the prior uses, and proposed construction activities, the Project has the potential to result in accidental releases of hazardous substances which are addressed in the following subsections.

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but any future development would still be subject to CEQA and the City's development review process which would identify potential or past contamination on a particular development site and require remediation prior to or in concert with grading and development. Therefore, the proposed SHSPA would have less than significant impacts relative to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and no programmatic mitigation is required.

Any grading of the Development Sites may result in “upset conditions” if onsite soils contain hazardous materials. The South Site has been determined to have no past or current issues regarding contamination by hazardous materials. However, the northeastern portion of the North Site had experienced past soil and groundwater contamination by tetrachloroethene (PCE) from offsite sources and a source associated with the historical operations of the Chemical Milling International Corporation (CMIC) from 1959-89 and more recently by International Rectifier (IR) that formerly occupied a site across the street. The North Site has been subject to a variety of testing and remediation procedures for PCE contamination from 2015 to 2021. This site had soil, soil vaper, and groundwater contamination in the past and still contains a monitoring grid that will be removed as part of the proposed Project based on feedback from the State Department of Toxic Substances Control (DTSC).

According to the Technical Memorandum prepared by SCS Engineers in March 2021 (Appendix H), the North Site has been fully characterized for hazardous material contamination and has been fully remediated using Soil Vapor Extraction (SVE). As a result of a “Data Gap Investigation” in 2017-2018, remediation of the southern half of the Property was determined by the state Department of Toxic Substances Control (DTSC) to be complete and indoor air sampling was conducted to assess the potential for vapor intrusion into structures on the northern half of the North Site (SCS 2017). Four rounds of indoor air sampling (two “summer” and two “winter” events) were conducted and there was no evidence of significant vapor intrusion in those buildings (p. 6, SCS 2021).

Local groundwater was also sampled from 2017 to 2019 and the highest concentrations of PCE and its degradation compounds (trichloroethene and cis-1,2-dichloroethene) were consistently detected in an off-site, cross-gradient well installed as part of the Data Gap Investigation and which is located directly downgradient of historical PCE releases from the IR facility (SCS 2019). These releases have contaminated the groundwater beneath the Project site.

A health risk assessment (HRA) was conducted in 2020 and found that contaminants were well within their respective “risk management ranges” and the resulting cancer risk estimates were within the EPA’s risk management range (SCS 2020). The North Site is currently zoned commercial/industrial use and the technical memorandum recommended recordation of a Land Use Covenant (LUC) for the property. The applicant and DTSC entered into a LUC dated November 29, 2021 (Appendix H) which specifically restricts uses of and activities that can occur on the property (e.g., no residences or residential occupants, no wells dug, etc.). To further minimize the potential for vapors to migrate from the subsurface into indoor air spaces, the technical memorandum recommended that the vertical and lateral well network for the vapor extraction system be removed and properly decommissioned and the groundwater monitoring wells and semi-permanent vapor probes on the property also be abandoned (p. 8, SCS 2021).

It should be noted that governmental database records indicate there is currently a Cortese site southwest of Grand and Kansas (IRC) but records show it (the Project site) has already been remediated. DTSC recommended several actions that still need to occur relative to the North Site which have been incorporated into **Mitigation Measures HAZ-1 and HAZ-2**.

In June 2021, the applicant contacted DTSC regarding the proposed caretaker units on the North Site in a commercial/industrial zone. In an email dated July 1, 2021, DTSC indicated they had evaluated the potential for human health risks associated with the planned caretaker units. Based on consultation with the DRSC Toxicologist, DTSC approved the

caretaker units. Nonetheless, the caretaker units were subsequently removed from the development application for unrelated reasons. However, the email also asked for a Soils Management Plan (see **MM HAZ-3** below) which would be a final condition of approval from DTSC for the Project Parcel E property (1330 E. Franklin Street).

The Phase I Environmental Site Assessments (ESAs) prepared for both Development Sites determined there may be a potential hazard for asbestos-containing materials (ACMs) which should be fully identified and remediated as appropriate prior to or in conjunction with building construction and reconstruction. The ESAs also recommended that operation and maintenance programs (O&MPs) for ACMs be put in place until demolition or interior reconstruction of the onsite buildings could occur (p. 6, A&W 2014a+b)(Appendix H). The objective of the O&EMPs was to implement a practical management approach to controlling identified ACMs within the subject properties, cleanup existing contamination, minimize future fiber release by controlling disturbance of ACMs, and monitor ACM conditions until they are removed from the two sites (see **MMM HAZ-3** below).

The following measures are recommended to implement the final stages of site characterization and remediation identified in the Data Gap Investigation for the North Site:

MM HAZ-1 Prior to issuance of a Certificate of Occupancy for the North Site (1330 E. Franklin Street), the applicant shall remove and properly decommission the vertical and lateral well network of the former vapor extraction system including abandonment of any groundwater monitoring wells and semi-permanent vapor probes on the property. This measure shall be implemented to the satisfaction of the City with input and regulatory oversight and written signoff by DTSC.

MM HAZ-2 Prior to issuance of a grading permit for the North Site (1330 E. Franklin Street), the applicant shall prepare and process a Soils Management Plan through the state Department of Toxic Substances Control (DTSC) for review and approval. Prior to issuance of a building permit, the applicant shall provide written confirmation from DTSC to the City that the Soil Management Plan has been implemented as approved.

MM HAZ-3 Prior to issuance of any demolition or building permits for South Site (1475 E. El Segundo Boulevard) or North Site (1330 E. Franklin Street), the applicant shall identify and effectively remediate any asbestos-containing materials (ACMs) associated with the onsite buildings. This remediation may be accomplished by either in-place encapsulation or removal as appropriate. The applicant shall retain a qualified asbestos contractor to conduct this work and shall provide the City with a final report within 45 days of completion of all remediation activities, including appropriate documentation of disposal of any onsite ACMs at an approved landfill. This measure shall be implemented to the satisfaction of the City Planning Department.

With implementation of Mitigation Measures HAZ-1 through HAZ-3, the Project's impacts relative to hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be reduced to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Prior activities on the Project Site may require clean-up and remediation efforts the during the Project construction period as outlined in Section 9.b above. The potential treatment efforts would be temporary and limited to the Project site premises and therefore the risk of release and public exposure is very limited.

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but any future development would still be subject to CEQA and the City's development review process which would identify potential or past contamination on a particular development site within a quarter-mile of the El Segundo Middle School and require remediation prior to or in concert with grading and development. Therefore, the proposed SHSPA would have less than significant impacts relative to hazardous emissions nears schools, and no programmatic mitigation is required.

Both Development Sites are within a quarter mile of El Segundo Middle School which is just north of E. Grand Avenue. on Center Street. The air quality assessment for the Project (MIG 2021a, Appendix B) included a health risk evaluation of Project grading and construction emissions and determined they would be well below the Local Significance Thresholds (LSTs) established by the South Coast Air Quality Management District (SCAQMD). The primary pollutants of concern during grading and any excavation of the site would be particulate matter (i.e., dust or PM) especially fine particulates ($PM_{2.5}$) which due to their small size can travel some distance away from the construction site depending on local conditions. However, standard dust control measures required by the SCAQMD under its Rule 403 are intended to limit the potential dispersion of particulates from construction sites, and the application of standard measures such as watering grading areas, covering trucks hauling soil, etc. will help reduce potential particulate dispersion from the Developments Sites as documented in Section 3, *Air Quality*.

As outlined in Section 9.b above, the North Site has experienced soil contamination in the past and Mitigation Measure HAZ-3 requires the applicant to prepare and process a Soils Management Plan through the state Department of Toxic Substances Control to assure there will be no significant on- or offsite impacts related to release of any hazardous materials during grading of that site.

Compliance with established regulatory requirements regarding remediation of the North Site and the fact the Project is only proposing office and commercial related uses means that the Project will have less than significant impacts related to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter mile of school and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but any future development would still be subject to CEQA and the City's development review process which would identify potential or past contamination on a particular development site and require remediation prior to or in concert with grading and development. Therefore, the proposed SHSPA would have less than significant impacts relative to being on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and no programmatic mitigation is required.

Past contamination on the North Site is described in detail in sub-section 9.b above. In addition to ongoing regulatory compliance, impacts related to listed hazmat sites will be reduced to less than significant levels by implementation of **Mitigation Measures MM HAZ-1 through HAZ-3** as described in sub-section 9.b above.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

In compliance with legislative requirements, the Los Angeles County Airport Land Use Commission (ALUC) prepared the Los Angeles County Airport Land Use Plan (ALUP) last revised on December 1, 2004. The ALUP provides for the orderly expansion of Los Angeles County's public use airports and the areas surrounding them. It is also intended to provide for the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards. In formulating the ALUP, the Los Angeles County ALUC established provisions for safety, noise insulation, and the regulation of building height in areas adjacent to each of the county's public airports.

The SHSP EIR indicated the SHSP was outside the Airport Influence Area (AIA) for the Los Angeles International Airport (LAX) so the SPA sites are not within the Comprehensive Land Use Plan (CLUP) for LAX. Therefore, the SPA would not interfere with any airport land use plan or otherwise create an airport-related safety hazard and thus there are no impacts and no programmatic mitigation is required.

The Project is part of the SHSP so similarly it would not interfere with any airport land use plans or activities. There will be no impacts and no mitigation is required.

NO IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The El Segundo Standardized Emergency Management System (SEMS) Emergency Operations Plan (EOP) addresses the City's planned response to extraordinary emergency situations and incorporates the Emergency Operations Center (EOC), phone systems, and other infrastructure changes that occurred since the first edition of the plan was created. The objective of the EOP is to centralize coordination of all necessary personnel and facilities of the City into an organization capable of responding to any emergency. The EOP addresses the four fundamental elements of comprehensive emergency management: Mitigation; Preparedness; Response; and Recovery.

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but the SPA does not change the location of planned uses so access and emergency planning needs of future development would be similar to that under the current SHSP. The SHSP EIR stated that implementation of the SHSP would not interfere with the City's adopted Emergency Operations Plan (EOP) because SHSP projects would be reviewed to ensure that new development would not create barriers to evacuation plans. In addition, the Fire Department and Police Department would be involved in any plans to convert existing two-way roads to one-way roads and implement angled parking to ensure emergency access needs can be met. Therefore, impacts of the SPA would be less than significant and no programmatic mitigation is required.

The Development Sites are located within the SHSP with access off of El Segundo Boulevard (a major arterial) with good access from three secondary streets (Kansas Avenue, E. Franklin Avenue, and Oregon Street). The two site plans indicate they will have adequate emergency access (previous Exhibits 8 and 9). Therefore, the Project will have less than significant impacts related to emergency plans and evacuation and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The Project Site is located in a highly urbanized area where there are no wildlands, so development of the proposed Project would not expose buildings or people to wildland fire hazards. Although this is not a wildfire prone area, the El Segundo Fire Department (ESFD) reviews development project site plans regarding fire protection and emergency access.

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but there are no wildland areas in or adjacent to the SHSP. The City is a highly urbanized area and no part lies within a Very High Fire Hazard Severity Zone. Therefore, the SPA will have no impacts to or from future development under the SHSPA related to wildland fires and no programmatic mitigation is required.

The two Development Sites are within the SHSP area and so they are not within a wildland fire risk area or a high or very high fire hazard severity zone, as outlined in the SHSP EIR. The ESFD has already reviewed and approved the site plans regarding fire protection and emergency access assuming compliance with their standard conditions of approval. Therefore, there would be no impacts and no mitigation is required.

NO IMPACT

Cumulative Impacts. The SHSP EIR indicated future development in the SHSP, which includes the SPA Sub-area, would have less than significant impacts relative to hazardous materials (hazmat) with regulatory compliance and remediation if necessary, based on appropriate characterization studies. Such studies on the Development Sites indicate the North Site was contaminated in the past and this Initial Study recommended appropriate mitigation with regulatory oversight from the state as necessary. With implementation of recommended mitigation and continued regulatory compliance, the Development Project will have less than significant impacts relative to hazmat issues. In these ways, the SPA and the Development Project will not make significant contributions to cumulative hazmat impacts.

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	■	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	■	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	■	☐
(iv) Impede or redirect flood flows?	☐	☐	■	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	■	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

The Project Site is near the Pacific Ocean and once contained natural drainages that are now improved and channelized. CEQA requires new development to be evaluated to determine if it would affect the quality or supply of surface or groundwater, natural drainage patterns, would be subject to flooding or erosion (that affects water quality), or be subject to other water-related hazards,

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Section 402 of the federal Clean Water Act requires National Pollutant Discharge Elimination System (NPDES) permits for stormwater discharges from storm drain systems to waters of the United States. The City is a co-permittee of the Los Angeles County storm drain system permit or "municipal permit" (Order No. R4-2012- 0175-A01; NPDES No. CAS004001), which was adopted November 8, 2012, and amended June 16, 2015, by the State Water Resources Control Board (WQ2015-0075). The proposed Project would be subject to the requirements of the Municipal NPDES Permit and the City's Municipal Code, which incorporates by reference the County of Los Angeles Low Impact Development (LID) Ordinance (Ordinance Number 2013- 0044). The Municipal Code requires application of erosion and sedimentation control Best Management Practices (BMPs) during construction for proper water quality management. Erosion control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. BMPs must be designed to prevent erosion and construction pollutants from entering the City's storm drain and receiving waters.

As part of its normal project approval and construction oversight activities, the City monitors compliance with stormwater BMP requirements. The Los Angeles County Municipal Permit also requires that stormwater pollution prevention plans (SWPPPs) be prepared for all construction projects with disturbed areas of one acre or greater. The statewide NPDES Construction General permit maintained by the State Water Resources Control Board also requires a SWPPP for construction projects that involve one or more acres of land disturbance. The SWPPP is required to outline the best management practices that would be incorporated during construction. These BMPs would minimize construction-induced water pollutants by controlling erosion and sediment, establishing waste handling/disposal requirements, and providing non-stormwater management procedures.

Further, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares and maintains a basin plan which identifies narrative and numerical water quality objectives to protect all beneficial uses of the waters of that region. The basin plan strives to achieve the identified water quality objectives through implementation of Waste Discharge Requirements (WDRs) and by employing three strategies for addressing water quality issues: control of point source pollutants, control of nonpoint source pollutants, and remediation of existing contamination. The Project site is located in the Los Angeles region and is, therefore, covered under the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan).

Future buildings under the SPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but this will not significantly increase the amount of impervious surfaces that would be constructed within the SHSP area. The City is already a highly urbanized area and new development is subject to various state and local regulations regarding surface and groundwater quality. Therefore, the SPA will have less than significant impacts related to water quality standards, waste discharge requirements, or degradation of surface or groundwater quality and no programmatic mitigation is required.

Development of the proposed Project under the SHSP would be required to comply with the federal and state laws and regulations regarding both short- and long-term water quality of both surface and groundwater sources.

All future development under the SHSP would have to be consistent with the requirements of the Los Angeles Basin Plan and the Municipal Separate Storm Sewer System (MS4) General Permit as administered by the LARWQCB. To achieve consistency with those regional water quality control plans, the City requires implementation of BMPs consistent with the Los Angeles Countywide Stormwater Quality Management Plan (SQMP) standards. Future projects within the SHSP must prepare a Storm Water Pollution Prevention Plan (SWPPP) to control short-term construction-related water quality impacts and a Water Quality Management Plan (WQMP) to control long-term operational water quality impacts.

Projects that disturb one or more acres of soil, like the proposed Project, are required to obtain coverage under the General Construction Permit. Before the City issues grading permits, an applicant must prepare a SWPPP to control common pollutants such as suspended soil in storm water runoff from leaving a project construction area. The SWPPP would include an Erosion Control Plan (ECP) and other appropriate BMPs.

The SHSP EIR concluded that construction of projects within the SHSP would have less than significant short-term impacts on surface water quality and would not significantly impact the beneficial uses of receiving waters as long as they complied with NPDES and City Municipal Code requirements.

The Project proposes office-related uses on the two Development Sites which represent a low potential for additional future contamination or degrade water quality impacts. The Project will also use available piped potable water supplies from the City rather than any direct groundwater use.

SHSP Section 3.6.3 (Stormwater Drainage) states the City will require developers to integrate Low Impact Development (LID) strategies including site designs that maximize permeable surface cover and infiltration potential. Finally, the City's planning review process requires preparation of a Water Quality Management Plan (WQMP) to demonstrate how future development will protect water quality over the long-term. Compliance with these regulatory programs will assure that the SHSP would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality. With implementation of existing regulations and SHSP policies, the Project's impacts related to water quality standards, waste discharge requirements, or degradation of surface water or groundwater quality would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The Project Site is located within the jurisdiction of the West Basin Municipal Water District (West Basin). West Basin purchases imported water from the Metropolitan Water District of Southern California (MWD) and wholesales the imported water to cities and private companies in southwest Los Angeles County, including El Segundo. Water utility service to the Project site is provided by the El Segundo Public Works Department Water Division.

The groundwater supply is extracted from the West Coast Groundwater Basin, which covers approximately 140 square miles and underlies much of the West Basin service area,

including El Segundo. The average amount of water extracted from the groundwater basin is approximately 36,000 acre-feet per year. Because the basin is adjudicated (i.e., the amount to be extracted each year has been determined by a court decision), the rights to the amount of groundwater extracted each year remain virtually the same. The Water Replenishment District of Southern California (WRD) is responsible for maintaining and replenishing the basin.

Future buildings under the SPA may be up to ten feet taller than currently allowed within the SPA Sub-area. However, this will not significantly increase the amount of surface or groundwater consumed within the SHSP area because the total amount of new development in the SHSP would not increase from its current approved limit. In addition, the City is already a highly urbanized area and water supplies for new development are strictly regulated. Therefore, the SPA will not substantially decrease groundwater supplies or substantially interfere with groundwater recharge or sustainable groundwater management of the basin. Impacts would be less than significant and no programmatic mitigation is required.

The Project Site is located within the West Coast Basin portion of the Los Angeles Coastal Plain groundwater basin. Development of the proposed Project under the SHSP would be required to comply with the many federal and state laws as well as local regulations regarding water supplies. However, the SHSP EIR stated that since groundwater was not used as a water supply source for the City, development under the SHSP would not result in the use of or deplete groundwater supplies or recharge. Based on the most recent groundwater monitoring from October 2019, depth to groundwater beneath the Project Site averages 106 feet below ground surface (bgs) and ranges from 17 to 21 feet above mean sea level (SCS 2021).

The Project proposes a total of 90,172 square feet of new office uses which could generate up to 120 new employees[9] on the two Development Sites. Based on an average consumption of 100 gallons per employee per day, including landscape irrigation, the Project will consume approximately 12,000 gallons per day or 13.4 acre-feet per year of potable water. This incremental additional consumption represents a less than significant impact on local surface or groundwater supplies (see Subsection 19, Utilities-Water).

LESS THAN SIGNIFICANT IMPACT

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site?

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

(iv) impede or redirect flood flows?

[9] Assumes 750 square feet per office employee as a generation rate

The existing site and surrounding area are fully developed with impervious surfaces and minimal landscaping. Development projects would be required to have a stormwater management system that is designed to comply with the City of El Segundo's LID requirements, which state that the first flush (resulting from the 85th percentile annual rainstorm) would need to be infiltrated in the soils via infiltration wells, captured in a cistern and treated for on-site re-use, or filtered through bio-retention planters and released.

Future buildings under the SPA may be up to ten feet taller than currently allowed within the SPA Sub-area, but this will not significantly increase the amount of impervious surfaces that would be constructed within the SHSP area. The City is already a highly urbanized area, there are no drainage channels or other major improvements within the SHSP area, and future development is subject to various state and local regulations regarding runoff, flood control, and short- and long-term surface and groundwater quality. Therefore, the SPA will have less than significant impacts related to alter the existing drainage pattern of the site or area and no programmatic mitigation is required.

The SHSP EIR stated that all new development will occur on properties already developed, including the proposed Project. As a result, storm water and irrigation runoff will continue to drain into the City's existing curb and gutter system. Detailed hydrology/low impact development reports were prepared for both Development Sites by Brandow and Johnston (Appendix G). The proposed development will install subsurface detention basin structures or drywells as outlined below:

South Site. Based on the hydrologic analysis, the total disturbed area post-development stormwater run-off for a 25-year storm event is approximately 0.54 cubic feet per second (cfs) and will produce 4,196 cubic feet (cf) of runoff volume in a 24-hour period. The 85th percentile run-off for a 24-hour storm is approximately 0.066 cfs. This run-off will flow through a storm drain pipe system then flow through drywells (to be installed) and infiltrate down into the soil and/or eventually discharge to the streets. In order to comply with the City and County Low Impact Development (LID) standards, all of the proposed building's roof drainage will be diverted to the proposed "drywells" (B&J 2020)(Appendix G).

North Site. Based on the hydrologic analysis, the total site post-development stormwater run-off for a 25-year storm event is approximately 3.01 cfs and will produce 19,458 cf of runoff volume in a 24-hour period. The 85th percentile run-off for a 24-hour storm is approximately 0.33 cfs. This run-off will flow through a storm drain pipe system then flow through two drywells (to be installed) and infiltrates down into the soil and/or eventually discharge to the streets. In order to comply with the City and County's Low Impact Development (LID) standards, all of the proposed building's roof drainage will be diverted to the proposed drywells (B&J 2018).

The drainage studies and Preliminary WQMP also demonstrate the Project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Compliance with state and local regulations for new development would improve storm water retention and quality.

(i) The Project drainage studies demonstrate that it would not create erosion, siltation, or flooding within or outside of the SHSP.

(ii) The drainage studies demonstrate the Project would not create any new drainage facilities or alter the courses of any existing drainage infrastructure. The SHSP would not create any new drainage facilities or alter the courses of any existing drainage

infrastructure, and the EIR concluded the SHSP would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems.

The drainage studies for the Development Sites demonstrate the Project will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site (pp.2-3, B&J 2018 and pp. 2-3, B&J 2020)(Appendix G).

(iii) The drainage studies demonstrate the Project will not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. In addition, the Project is commercial (office) in nature and so would not contribute substantial additional sources of polluted runoff.

(iv) Finally, the Development Sites are not within a 100-year flood hazard area, as documented in the GP EIR and the SHSP EIR, so future development under the SHSP would not place housing or structures within a 100-year flood hazard area. Therefore, the Project would not alter or impede flood flows since it is a part of the SHSP.

Development of the proposed Project within the SHSP would also be required to comply with the many federal and state laws and regulations regarding both short- and long-term water quality so its water quality impacts would also be less than significant and no mitigation is required. As a part of the SHSP, the Project would also not alter existing drainage patterns or infrastructure so impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

According to the Los Angeles County Tsunami Inundation Maps10, the Project Site is not located within a tsunami inundation area. There are no bodies of water located on or near the Project site, therefore, inundation caused by a seiche would not occur.

The SPA is part of the SHSP and only addresses building height limits. The SHSP EIR concluded that, due to the location and physical characteristics of the City, the SHSP would have less than significant impacts with respect to seiches, tsunamis, or mudflows. Since there are no impacts, there would be no opportunity for additional polluted runoff from these sources. Therefore, the SPA will have no impacts and no programmatic mitigation is required.

The Development Sites are located approximately 1.5 miles from the Pacific Ocean and the average elevation ranges from 98 to 136 feet above mean sea level. The County of Los Angeles Seismic Safety Element (Leighton 1990) and the State of California Tsunami Inundation Map for Emergency Planning for the Venice Quadrangle (CGS 2009), the site is not located in a tsunami inundation area and the potential for a tsunami-related impacts at the site is considered very low. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. No major water-retaining structures are located immediately up gradient from the Development Sites. Flooding from a seismically-induced seiche is considered unlikely. The site is within an area of minimal flooding (Zone X) as defined by the Federal Emergency Management Agency (FEMA 2017)(LACDPW 2017)(CGS 2009)(p.8, Geocon 2017).

10 California Emergency Management Agency, 2009. Tsunami Inundation Map for Emergency Planning, Venice Quadrangle.

Earthquake-induced flooding is inundation caused by failure of dams or other water-retaining structures due to earthquakes. Based on a review of the Los Angeles County Safety Element (Leighton 1990), the sites are not located within a potential inundation area for an earthquake-induced dam failure. Therefore, the probability of earthquake-induced flooding is considered very low (p. 8, Geocon 2017). Based on available information, these various water-related risks or potential impacts will be less than significant for the Project.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Project is designed to be consistent with the LA Basin Plan, Statewide NPDES General Construction Permit and Municipal Code/LA County LID Standards for water quality control, for both construction and site improvements. As mentioned above, the West Basin Municipal Water District's 2020 Urban Water Management Plan (UWMP) states that the estimated 2020 water supply consists of: 19 percent groundwater; 52 percent imported water; 12 percent recycled water; 17 percent water conservation savings; and less than 1 percent desalinated water. The groundwater supply that serves El Segundo is extracted from the West Coast Groundwater Basin and the Water Replenishment District of Southern California (WRD) is responsible for maintaining and replenishing the basin. Limited natural replenishment of the basin's groundwater supply occurs through the underflow from the Central Groundwater Basin and local precipitation when available.

Future buildings under the SHSPA may be up to ten feet taller than currently allowed within the SPA Sub-area. However, this will not significantly increase the amount of surface or groundwater consumed within the SHSP area because the total amount of new development in the SHSP would not increase from its current approved limit. In addition, the City is already a highly urbanized area and water supplies for new development are strictly regulated. Therefore, the SPA will not substantially decrease surface water or groundwater supplies or interfere with groundwater management of the basin. Impacts are less than significant and no programmatic mitigation is required.

Water Quality Control Plans (surface water). The California legislature has assigned to the State Water Quality Control Board (SWQCB) and its nine Regional Water Quality Control Boards (RWQCBs) the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the Clean Water Act. The SWQCB provides state-level coordination of the water quality control program by establishing statewide policies and plans for implementation of state and federal regulations. The nine RWQCBs throughout California adopt and implement Basin Plans that recognize the unique characteristics of each region with regard to natural water quality, actual and potential beneficial uses, and water quality problems.

The Los Angeles RWQCB is responsible for the protection of the beneficial uses of waters within the coastal watersheds of Los Angeles and Ventura counties, including the Project area. The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura counties (**Basin Plan**) designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan (California Water Code Sections 13240–13247). The Los Angeles RWQCB Basin Plan must conform to the policies set forth in the Porter-Cologne Act as established by the SWRCB in its state water policy. The Porter-Cologne Act also provides the RWQCBs with authority to include within their basin plan water discharge prohibitions applicable to particular conditions, areas, or types of

waste. More specifically, the Basin Plan: (i) identifies beneficial uses for surface and ground waters, (ii) includes narrative and numerical water quality objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and (iii) describes implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan. The Basin Plan is continually being updated to include amendments related to implementation of TMDLs of potential pollutants or water quality stressors, revisions of programs and policies within the Los Angeles RWQCB region, and changes to beneficial use designations and associated water quality objectives.

Surface Water. The federal Clean Water Act allows individual states to operate their own NPDES programs provided such programs meet minimum Federal requirements. The Los Angeles Regional Water Quality Control Board (LARWQCB) maintains the Los Angeles Basin Plan and issues the Municipal Stormwater National Pollutant Discharge Elimination System Permit (MS4) to implement the Basin Plan, both of which encompass the City of El Segundo. The objective of Order No. 01-182 is to protect the beneficial uses of receiving waters in Los Angeles County. To meet this objective, the Order requires that the Los Angeles Countywide Stormwater Quality Management Plan (SQMP) specify Best Management Practices (BMPs) that would be implemented to reduce the discharge of pollutants in stormwater to the maximum extent practicable. Further, Permittees are to assure that stormwater discharges from the MS4 shall neither cause nor contribute to the exceedance of water quality, standards and objectives nor create conditions of nuisance in the receiving waters, and that the discharge of non-storm water to the MS4 has been effectively prohibited.

The SHSP EIR indicated that future development under the specific plan would be consistent with the requirements of the Basin Plan and the MS4 Permit. This conclusion applies to the proposed Project as well. To achieve that consistency, the City requires implementation of BMPs consistent with the SQMP standards. The Project must comply with Municipal Code Section 5-4-9, *Construction Activity Stormwater Measures*, which include BMPs as outlined in the Project water quality studies (Appendix G). Future projects within the SHSP must prepare SWPPPs to control short-term construction-related water quality impacts and a Water Quality Management Plan (WQMP) to control long-term operational water quality impacts.

Groundwater Management. The SHSP area is underlain by the West Coast (groundwater) Basin. Groundwater storage and extraction in the West Coast Basin is governed by the basin adjudication with excess production restricted to emergencies. An amended judgment establishing water rights of 64,478 acre-feet (AF) and enjoining excess extractions was filed in 1977 and most recently amended in 1989. Total storage in the West Coast Basin is estimated to be approximately 6.5 million AF. Unused storage space is estimated to be approximately 1.1 million AF. Of the unused storage space, the amount available for groundwater storage is only 120,000 AF because the upper 75 feet cannot be used for groundwater storage due to historical contamination (USDI 2014).

The San Pedro Formation beneath the property includes both the Gage and Silverado Aquifers. Active water injection wells in the area target the lower Silverado Aquifer and are part of the West Coast Basin Seawater Barrier used to control intrusion of salt water in the usable aquifer. The Project property is located west (ocean side) of the barrier system, and shallow groundwater quality located in the Gage Aquifer is poor due to high total dissolved solids (TDS) content as a result of saltwater intrusion. Groundwater in the shallow aquifers in this area has also been impacted by contamination associated with industrial development (i.e., solvent- and/or fuel-related). On November 2, 1998, the Los Angeles

Regional Water Quality Control Board (RWQCB) adopted Resolution No. 98-18, which removed the municipal and domestic (MUN) beneficial use designation for the groundwater located in the El Segundo area due to saltwater intrusion and the groundwater contamination at the nearby Chevron refinery which is located just south of the Development Sites (SCS 2017).

The SHSP EIR stated the majority of the area was currently covered in impervious surfaces, and strategies and LID encouraged by the SHSP will eventually increase the amount of pervious surface area and thus groundwater recharge capabilities. The EIR stated that since groundwater was not used as a water supply source for the City, development under the SHSP would not result in the use of or deplete groundwater supplies or recharge. Therefore, both the SPA and the Project, which are both within the SHSP, would have no impacts on groundwater management planning or plans and no programmatic or project-specific mitigation is required.

Development of the proposed Project under the SHSP and SPA would be required to comply with the many federal and state laws and regulations regarding both short- and long-term water quality that protect both surface and groundwater sources. Additionally, this regulatory compliance would reduce potential water quality impacts of developing the Development Sites to less than significant levels so no programmatic or Project-specific mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA Sub-area, including the Development Sites, is completely urbanized and contains no natural drainages. The SPA allows increased building heights but it would not change FAR or total development square footage under the SHSP. Future development under the SPA, and the Development Project, would be required to comply with all applicable federal, state, regional, and local regulations regarding water quality, and would be required to demonstrate they would have no significant impacts on downstream properties from runoff. In these ways, the SPA and the Development Project will not contribute to significant cumulative impacts regarding hydrology or water quality.

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	■	☐

The Project area is highly urbanized with a variety of improved land uses, including existing light industrial buildings on the two Development Sites. New development must not disrupt the surrounding community and be consistent with plans established for the safe and efficient use of land within the City and region. The City of El Segundo's General Plan and Zoning Ordinance govern the land use of the Project site and surroundings; there are no other governmental authorities with land use control over this Project.

a. Would the project physically divide an established community?

Development under the proposed SPA would result in some taller buildings but would still be of the same type and overall locations outlined in the SHSP. There would be no displacement of buildings or residential structures Therefore, the SPA would have no impact regarding existing neighborhoods and no programmatic mitigation is required.

The Development Sites are already developed with buildings and surface parking. Development of the two site parcels would not interfere or divide any existing neighborhoods so there would be no impacts and no mitigation is required.

NO IMPACT

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed SPA would allow for a ten-foot increase in maximum permissible building heights within the SPA Sub-area. However, development under the proposed SPA would still be of the same type and overall locations outlined in the SHSP. The SHSP EIR had already evaluated that implementation of the SHSP would eventually shift land uses from industrial to offices and related uses (DEIR Table 13-2). The SHSP EIR concluded that policies, standards, and regulations outlined in the SHSP were consistent with existing City regulations and would not conflict with existing City General Plan policies. SCAG's RTP/SCS outlines goals for guiding the development of local land uses as "smart growth". The EIR explains how the SHSP meets the SCAG goals (DEIR Table 13-3). Therefore, the SHSPA would have less than significant impacts regarding consistency with local and regional land use-related plans and no mitigation is required.

The Project is a part of the office development planned within the approved SHSP. The Project proposes a total of 90,172 square feet of office development compared to the 517,094 total new square feet proposed under the SHSP. Under the current SHSP, both the South Site and the North Site have a permitted base Floor Area Ratio (FAR) of 1.0 and may exceed the base FAR with approval of a Community Benefits Plan. Under the proposed Project, development of the North Site would result in a total of 65,061 square feet of floor area (FAR=0.95), which is within the permitted base FAR of 1.0:1. Development of the South Site would result in a total of 63,915 square feet of floor area (FAR=1.45), which is permitted with the approval of a Community Benefits Plan. Although the development of the South Site would exceed the permitted base FAR, the Project is still within and consistent with the overall growth limits allowed by the SHSP.

Under the SPA, both the South Site and the North Site have a permitted base building height of 35 feet and may exceed the base building height (up to a maximum of 60 feet) with the approval of a Community Benefits Plan. Under the Proposed Project, both the North Site and the South Site would be developed with three story buildings with a maximum height of 59 feet six inches. Therefore, with the approval of the SPA. the Project would be consistent with the SHSP.

The Project is also consistent with the SCAG goals for the reasons discussed in the SHSP EIR. (See Draft EIR, pp. 13-7 through 13-8.) In addition, Subsection 3.a, Air Quality, demonstrates that the Project is consistent with the growth assumptions of the 2016 Air Quality Management Plan (AQMP).

This analysis demonstrates the proposed Project is consistent with applicable regional and local land use plans and goals. Impacts in this regard are therefore less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA would affect building heights within the SPA Sub-area but would not affect other land use or development characteristics of the SHSP. The Development Project is also consistent with land use and planning guidelines of the SHSP other than building height which is addressed by the SPA. The SPA and Development Project are also consistent with applicable City General Plan goals and policies and the goals of SCAG's regional plans. Therefore, the SPA and the Development Project will have less than significant cumulative impacts related to local and regional land use and planning.

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	■	☐
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	■	☐

As described in the General Plan Conservation Element, the City has been associated with petroleum resource development dating back to its founding in 1911. The City is partially underlain by the El Segundo Oil Field, where over 14 million barrels of oil and condensate were produced locally between 1935 and 1992, but production has steadily declined since 1967. The Project site is not located within the El Segundo Oil Field, which is located on the south side of Mariposa Avenue, as delineated by the California Department of Conservation, Geologic Energy Management Division (CalGEM). The region also contains sand and gravel which is plentiful due to the alluvial nature of the LA Basin in general and the Development Sites in particular. However, extraction of such resources is problematic because the Project area is highly urbanized and such activities can impact surrounding land uses and human activities.

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

(a-b) The City of El Segundo General Plan EIR and the SHSP EIR both state that the entire City was once within the El Segundo Oil Field. From 1935 to 1987, 76 wells were drilled in this field, and produced over 13.6 million barrels of oil. While there are several wells still operating in the City, there are no oil wells currently in operation within the SHSP area. The City is also in the San Fernando Valley Production-Consumption Region and is classified as Mineral Resources Zone 3 (MRZ-3). This classification is defined as “areas containing mineral deposits the significance of which cannot be evaluated from available data”. The SHSP EIR noted that the City is already urbanized and does not have other known mineral resources.

The proposed SPA would modify building heights, however, there are no aspects of the SPA that are related to the presence or absence of any mineral resources within the SHSP. Therefore, the proposed SHSPA would have no impacts relative to mineral resources and no programmatic mitigation is required.

As part of the SHSP area, the Development Sites do not contain oil wells or other identified mineral resources of value or recognized at either at a state level or local level that can be reasonably extracted given existing onsite and surrounding land uses. There are also no land use or zoning designations that relate to properties within the SHSP. Therefore, impacts of the Project regarding mineral resources are less than significant and no mitigation is required

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SHSP EIR concluded that development within the SHSP would have no significant impacts related to mineral resources. The SPA Sub-area, which includes the Development Sites, does not contain any identified mineral resources and are in urban settings which would make new mineral extraction activities problematic. Therefore, the SPA and the Development Project will not make significant contributions to regional cumulative impacts regarding mineral resources.

13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	■	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■

Sound is a disturbance in the air created by a moving or vibrating source and is capable of being detected by the hearing organs. The sound may be thought of as mechanical energy of a moving object transmitted by pressure waves through a medium to a human ear. For traffic or stationary noise, the medium of concern is air. *Noise* is defined as sound that is loud, unpleasant, unexpected, or unwanted. A continuous sound is described by its *frequency* (pitch) and its *amplitude* (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch (bass sounding) and high-frequency sounds are high in pitch (squeak). These oscillations per second (cycles) are commonly referred to as Hertz (Hz). Sound pressure level (SPL or Lp) is used to describe in logarithmic units the ratio of actual sound pressures to a reference pressure squared. These units are called decibels and abbreviated as dB.

In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, (A-weighted scale) and it perceives a sound within that range as being more intense than a sound with a higher or lower frequency with the same magnitude. The A-scale weighing is typically reported in terms of A-weighted decibel (dBA). Typically, the human ear can barely perceive the change in the noise level of 3 dB. A change in 5 dB is readily perceptible, and a change in 10 dB is perceived as being twice or half as loud. Because decibels are a logarithmic scale, a doubling of sound energy results in a 3 dB increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a highway), would result in a barely perceptible change in sound level.

Noise in our daily environment fluctuates over time. Some noise levels occur in regular patterns, others are random. Some noise levels are constant, while others are sporadic. Noise descriptors were created to describe the different time-varying noise levels. The overall noise environment of an area can be characterized by the Community Noise Equivalent Level (CNEL) which carries "penalties" for nighttime noise which is typically considered more intrusive especially in suburban and rural settings*:* The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

Noise levels associated with traffic depends on a variety of factors: (1) volume of traffic, (2) speed of traffic, (3) auto, medium truck (2 – 6 wheels) and heavy truck percentage (3 axles and greater), and sound propagation conditions. The greater the volume of traffic, higher speeds and truck percentages equate to a louder volume of noise. A doubling of the Average Daily Traffic (ADT) along a roadway will increase noise levels by approximately 3 dB.

Noise impacts are most severe on certain individuals or groups of persons such as the young, the old, and the sick. Land uses that house these sensitive persons are referred to as sensitive receptors (e.g., residential uses, hospitals, day care centers, etc.). Noise assessments typically identify the closest sensitive receptor to a project site and then calculate the maximum noise levels at that location (for both construction and operation) as a "worst case" or conservation assessment of potential noise impacts.

Municipal Code Section 7-2-4, Noise Standards, identifies the City's operational noise threshold for commercial and industrial properties as 8 dBA above the ambient noise level. In addition, Municipal Code Section 7-2-10, Exemptions, indicates that noise from construction activities is considered exempt (i.e., less than significant) as long as construction activities do not take place between the hours of six o'clock (6:00) P.M. and seven o'clock (7:00) A.M. Monday through Saturday, or at any time on Sunday or a Federal holiday, and provided the noise level created by such activities does not exceed the noise standard of sixty five (65) dBA plus the limits specified in subsection 7-2-4C of this Chapter as measured on the receptor residential property line and provided any vibration created does not endanger the public health, welfare and safety.

The Project area is completely urbanized and experiences elevated noise level from a variety of human sources, including traffic, air conditioning units, industrial equipment, aircraft, etc. New development must be evaluated to assure that it will neither increase noise or vibration levels beyond accepted standards to protect human health and building integrity (for vibration), nor that its new occupants will be subject to harmful levels of noise from the existing environment.

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The proposed SPA would modify building heights but these changes would not result in any demonstrable increase traffic in and around or activities on individual building sites. This is because the height change[11] would not result in an increase in FAR or overall development

11 increase to 60 feet from the current Tier II maximum of 50 feet only within a specific sub-area of the SHSP Smoky Hollow East area

intensity. Therefore, the overall level of development and therefore overall noise impacts of the SPA would remain equivalent to that of the current SHSP and as identified in the SHSP EIR. Therefore, the proposed SHSPA would have less than significant impacts relative to permanent noise and no programmatic mitigation is required.

A detailed noise assessment was prepared for the proposed Project and the following discussion summarizes the results of that assessment (MIG 2021b). The following sections evaluate the noise sources and levels associated with the temporary construction activities and long-term operations of the proposed Project and compares increased noise levels to the applicable City standards.

Regarding noise thresholds, Section 7-2.10D of the City's Municipal Code indicate that noise and vibration associated with the construction, repair, or remodeling of any real property is exempt from City noise standards provided: 1) Activities do not take place between the hours of 6 PM and 7 AM Monday through Saturday, or any time on Sunday or a Federal holiday; 2) The noise level created by such activities does not exceed 65 dBA as measured at a residential property line (increases in this standard are permitted pursuant to Section 7-2-4C of the Municipal Code); and 3) vibration does not endanger the public health, welfare, and safety. The City's Municipal Code does not establish a specific, numeric noise standard for construction noise at commercial property lines. However, it does establish an "ambient plus 8 dBA standard for commercial/industrial areas. In addition, the City's General Plan Noise Element provides land use compatibility standards for interior and exterior noise. The City's exterior and interior compatibility standard for commercial and industrial activities is 75 DNL

Project – Construction Noise

The proposed Project involves construction activities including demolition, building construction, minor grading and paving, and architectural coating activities in an existing commercial/light industrial area of the City. A detailed noise study was prepared for the Project (MIG 2021b)(Appendix C). Construction activities are anticipated to begin at the North Site in January 2022; from January 2023 to March 2023 at the South Site. Some concurrent activities may include demolition (South Site), building construction (North and South Site), grading (North Site), paving (North Site), and architectural coating (North Site) activities may occur. Total construction activities may last up to 29 months.

Worst case hourly L_{eq} and L_{max} construction equipment noise levels are predicted to be approximately 82 and 85 dBA, respectively, at 50 feet; however, the magnitude of the proposed Project's temporary and periodic increase in ambient noise levels would depend on the nature of the construction activity (i.e., demolition, building construction, grading) and the distance between the construction activity and sensitive receptors/outdoor use areas.

Project construction activities would primarily take place adjacent to Franklin Avenue (North Site), El Segundo Boulevard and Kansas Street (South Site), and at an existing parking garage (both sites). All construction activities would occur at least 600 feet or more from any sensitive residential receptor. At this distance, potential construction noise levels would be less than 65 dBA L_{eq}. Although construction activities could generate noise levels up to approximately 82 dBA at a distance of 50 feet, such noise levels would not disrupt existing light industrial building operations or patronage because these buildings are not considered noise-sensitive and do not include sensitive outdoor use areas. Project construction also would not affect the Chevron Refinery employee park because this park is not considered noise-sensitive since it is within the refinery property and subjected to refinery noise levels. In addition, all anticipated construction will take place during work hour indicated in the Municipal Code (see below).

The proposed Project would not generate construction noise levels that exceed City standards or otherwise result in a substantial temporary increase in ambient noise levels because:

1. Construction activities would be tailored to the proposed building modifications and additions. Building construction activities would not require substantial heavy duty equipment operations, and extensive grading activities are not proposed at either the North Site or the South Site. Worst case noise levels, which would occur during demolition and grading activities, would last approximately two months at each site.
2. Construction equipment contains standard noise suppression devices such as mufflers, engine shields/covers, and engine/mechanical isolators/mounts that typically reduce engine, mechanical, and exhaust noise levels below standard reference noise levels, which are based on older equipment operations.
3. The proposed Project would comply with City of El Segundo Municipal Code Section 7.2.10D, which limits construction activities to the hours of 7 AM to 6 PM Monday through Saturday only. This code requirement generally limits construction activities to daytime hours when people are generally considered to be least sensitive to environmental noise levels.

For the reasons outlined above, the proposed Project's construction activities would not generate a substantial, temporary increase in ambient noise levels at sensitive receptor locations. Impacts would be less than significant and no mitigation is required.

Project – Operational Noise

Once constructed, the proposed Project would generate noise from the same types of sources and activities currently present at the North Site and the South Site, such as on- and off-site vehicle trips, on-site vehicle maneuvering, queueing, and parking, the operation of stationary equipment such as heating, ventilation, and air conditioning (HVAC) equipment, landscaping and maintenance activities, and waste-disposal collection, etc. The North Site also includes a small (less than 800 square feet) coffee kiosk situated next to a small pocket park.

The City's Municipal Code exempts many of these sources from the noise standards described above, including noise levels from real property maintenance, provided the maintenance activities occur between 7 AM and 8 PM Monday through Saturday and 9 AM to 8 PM on Sunday (Municipal Code Section 7-2-10E), and noise levels regulated by state or federal law (e.g., individual motor vehicle noise levels; Municipal Code Section 7-2-10F).

The proposed Project would increase the amount of vehicle trips currently accessing the North and South Site, as well as the adjacent parking garage. On-site vehicle activity would increase by a factor of approximately four (4x) most of which would occur in the existing parking garage. The noise assessment determined the proposed Project would not involve substantial on-site equipment or activities at either the North Site or the South Site that could generate noise levels that exceed City standards or otherwise result in a substantial increase in ambient noise levels.

The proposed Project would also include rooftop-mounted HVAC units that can produce noise levels up to 76 dBA at a distance of 3 feet. Based on distance attenuation, HVAC noise levels would reach 50 dBA at a distance of 60 feet. The noise assessment determined that HVAC equipment would not generate substantial noise levels at adjacent commercial

property line locations or result in more than 1 dBA change in overall ambient noise levels in the vicinity of the Project Site.

Ambient noise levels at and near the North and South Sites are dominated by traffic on E. Franklin Avenue (North Site), E. El Segundo Boulevard (South Site), the Chevron Refinery (South Site), and other local commercial/light industrial buildings (both sites). The proposed Project would generate traffic that would be distributed onto the local roadway system and potentially increase noise levels along local travel routes. Caltrans considers a doubling of total traffic volume to result in a three (3) dBA increase in traffic-related noise levels (Caltrans, 2013). If the proposed Project does not result in a doubling of traffic volumes on the local roadway system, it would not result in a substantial permanent increase in traffic-related noise levels. The proposed Project would generate 490 net new trips from the North Site (on East Franklin Avenue) and 511 net new trips from the South Site (on El Segundo Boulevard), for a total of approximately 1,000 net new trips on a daily basis (Kimley-Horn, 2021). The average daily traffic (ADT) on the segments of East Franklin Avenue and East El Segundo Boulevard that run adjacent to the North and South Site are at least 832 and 20,946, respectively (City of El Segundo, 2018, Table 15-7). The proposed Project's trip generation on East Franklin Avenue (490 net new daily trips) and East El Segundo Boulevard (up to 1,000 new net trips) would be far less than either of those roadway volumes and would result in substantially less than a doubling of daily traffic volumes on roadways used to access the site.

The noise assessment concluded that construction and operation of the proposed Project, including all stationary and mobile sources, would not result in a substantial, permanent increase in noise levels along the roadways used to access the proposed Project as compared to existing (2021) or future conditions. This impact would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures. The types of construction vibration impact include human annoyance and building/property damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between the vibration source and the receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The following analyzes the potential vibration impacts associated with the construction and operations of the proposed Project.

The proposed SPA would modify building heights. These changes may incrementally increase traffic or other activities on individual building sites which may generate vibration. However, the overall vibration from development under the SHSP would be less than significant and no programmatic mitigation is required.

The noise assessment for the Project also included an evaluation of vibration impacts. The proposed Project would not include substantial construction or operational activities that could generate sustained groundborne vibration levels at existing commercial or residential buildings that could result in building damage or sustained human annoyance. The largest equipment operations (during grading) would occur at least 50 feet from the closest structures (parking garage, adjacent light industrial buildings). Standard construction equipment (e.g., bulldozers, trucks, jackhammers, etc.) generally does not cause vibration that could cause structural or cosmetic damage, but may be felt by nearby receptors.

The closest structure is approximately 50 feet away from potential work areas at both the North Site and the South Site. At this distance, equipment would not generate ground-borne vibration that has the potential to damage the structural integrity of any buildings near work areas. For reference, Caltrans recommends a damage threshold for modern industrial and commercial buildings of 0.5 inches/second (Caltrans 2020). The noise assessment determined that the maximum predicted groundborne vibration level at 50 feet for typical equipment is 0.042 inches/second which is substantially less than the Caltrans threshold.

Once operational, the proposed Project would not have any large equipment that would generate vibration.

For the reasons outlined above, the proposed Project would not generate excessive ground-borne vibration or noise levels during either construction or operation, and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people be residing or working in the project area to excessive noise levels?

In compliance with legislative requirements, the Los Angeles County Airport Land Use Commission (ALUC) prepared the Los Angeles County Airport Land Use Plan (ALUP) last revised on December 1, 2004. The ALUP provides for the orderly expansion of Los Angeles County's public use airports and the areas surrounding them. It is also intended to provide for the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards. In formulating the ALUP, the Los Angeles County ALUC established provisions for safety, noise insulation, and the regulation of building height in areas adjacent to each of the county's public airports.

The SPA could affect building heights within the SHSP. However, the SHSP is outside the LAX Airport Influence Area (AIA) and is not addressed in its CLUP, and there are also no private airstrips within two miles of the SHSP area. Therefore, the SHSPA would not be impacted by airport noise so there are no impacts and no programmatic mitigation is required.

The proposed Project is located approximately 1.2 miles south of LAX. According to the LAX Airport Influence Area Map, the Project is not located within LAX's planning boundaries (LAWA 2021). The next closest airport, Hawthorne Municipal Airport (HMA), is located approximately 3.1 miles to the east. The Project Site is not located within the HMA planning

boundaries (Los Angeles County ALUC, 2003). Thus, the proposed Project would not expose people working in or visiting the Project area to excessive airport-related noise levels. Impacts will be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA would only affect building heights in the SPA Sub-area which would increase noise levels from future development. In addition, the noise study for the Development Project concludes it will have less than significant short- and long-term noise impacts. Therefore, the SPA and Development Project will not have significant cumulative noise impacts,

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	■	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	■	☐

The Project Site is part of the LA Basin which supports millions of residents and employees in homes and businesses. New development must be evaluated to assure it will not introduce levels of growth that are unplanned and beyond the service capabilities of local jurisdictions.

The proposed Project is consistent with the City of El Segundo General Plan land use policies and the Smoky Hollow Specific Plan which designate the Project site for office uses. No housing units would be developed as part of the Project, and no new or expanded urban infrastructure would be constructed that could foster increased development intensity onsite or at surrounding properties. Similar to other construction projects in the region, the Project construction workers would be expected to be drawn from the large, available regional labor force, who would commute to the Project site during the construction stages.

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The SPA only addresses maximum building height and does not allow any additional caretaker units over that currently allowed in the SHSP. Therefore, the SPA would have no influence on population growth in the City. The SPA would be no impacts and no programmatic mitigation is required.

By comparison, the SHSP EIR stated the only new residential dwellings allowed in the SHSP would be a total of up to six new caretaker units which would only generate 18 new residents in the City. This small amount of population growth is readily accommodated under both the SCAG 2040 population and growth projection and City General Plan Buildout forecast. Implementation of the SHSP would also generate an estimated 951 additional jobs which could result in an increase in population within the City and adjoining areas as future employees and their families relocate to areas closer to their jobs. The SHSP EIR examined the potential impacts to the City-wide housing stock and indicated there were sufficient

vacant homes or multi-family units such that the SHSP would not have significant impacts on housing in the City. Since it is not residential in nature, the EIR determined the SHSP would have less than significant impacts on the City's future population and housing growth and no mitigation was required.

The Project proposes the two parcels to be used as offices with no caretaker units so there will be minimal direct growth impacts related to population or housing. The additional 90,172 square feet of office uses and 120 new employees to be developed by the Project is greater than the permitted base FAR under the SHSP (but allowed with approval of a CPB) and may result in some indirect or induced housing and/or population growth to the degree that the estimated 120 new project employees[12] choose to buy a house or rent an apartment and move into the City. The Project is not expected to result in the displacement of any existing City residents (population) or housing by its development. Therefore, potential impacts are considered to be less than significant, and no mitigation is required

LESS THAN SIGNIFICANT IMPACT

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

There is no existing housing on the Project site so construction and renovation of the proposed buildings would therefore not displace any people or housing.

Even with the SPA, the SHSP would still only propose non-residential development so it would not have any significant direct impact on population or housing in the City. The increased building height allowed under the SPA may incrementally increase the amount of development on particular sites in the future, but the SPA would not increase the overall amount of development anticipated within the SHSP and would not displace any existing residential units. Therefore, the SHSPA will not displace any existing residents or housing in the City or require the construction of replacement housing. Impacts will be less than significant and no programmatic mitigation is required.

Since the Project is part of the SHSP, and will also not add any residential uses, similar conclusions regarding the lack of displacement of persons or housing would apply as well.

The additional 90,172 square feet of office uses to be developed on the Project parcels may result in some amount of indirect or induced housing and/or population growth to the degree that some 120 new project employees[13] may choose to buy a house or rent an apartment and move into the City from some other jurisdiction. However, the Project is not expected to result in any displacement of existing City residents (population) or housing by its development. Therefore, potential impacts are considered to be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA and Development Project deal with non-residential land uses so they will have only less than significant indirect and no direct or cumulative impacts relative to population or housing.

[12] Assumes 750 square feet/office employee (90,172 square feet divided by 750 square feet/employee = 120 employees)
[13] Up to 120 new employees assuming 750 square feet/office employee and 90,172 square feet of new office uses

15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1. Fire protection?	☐	☐	■	☐
2. Police protection?	☐	☐	■	☐
3. Schools?	☐	☐	■	☐
4. Parks?	☐	☐	■	☐
5. Other public facilities?	☐	☐	■	☐

The Project Site is part of the larger LA Basin whose residents and employees require a variety of public services including police, fire, schools, parks, etc. New development must be evaluated to assure it is within the service capabilities of local jurisdictions.

*a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered **fire protection** facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The SPA would increase the maximum permissible building heights for future development within the SPA Sub-area by ten feet. This could allow more intensive development on certain sites than under the current SHSP. This increased height of development could result in incremental increases in the need for fire protective services or specialized equipment. However, the increased development intensity on individual sites will still not exceed the overall growth expected for buildout within the SHSP. In 2018 the ratio for operational protection/EMS personnel was one fire fighter per 1,026 population. The SHSP EIR concluded the SHSP would increase the population by 18 persons which would cause a 0.1 percent increase in the service ratio. The EIR also concluded that demand for protection/EMS personnel or equipment from the SHSP would not exceed the current CFD

operation standards. The EIR also concluded that demand for protection/EMS personnel or equipment from the SHSP would not exceed the current CFD operation standards.

Similar to the impacts identified in the SHSP EIR, impacts of the SPA related to fire protection would be less than significant and no programmatic mitigation is required.

The additional office space proposed by the Project would increase office square footage and number of employees on the Development Sites and would incrementally increase in fire protection services. The El Segundo Fire Department (ESFD) provides fire protection and emergency medical services to the Project area. The City is divided into two districts (i.e., Stations) for fire response. Station 1 responds to calls west of Pacific Coast Highway and Station 2 responds east of Pacific Coast Highway. Depending on the nature or size of the alarm, units may cross over into the other district and coordinate resources to assist. When an alarm to any address with serious consequences to life or property exists, all units in the City respond (City of El Segundo Fire Department, n.d.). The Project is located in the fire response district for Station 1 which is location at 314 Main Street which is approximately 1.1 mile northwest of the Development Sites (ESFD 2021). At an average speed of 35 miles per hour, the response time from this station for an emergency call would be approximately 1.6 minutes.

The Project would be required to obtain approval from ESFD to verify that the Project complies with the 2019 California Fire Code, local amendments, and El Segundo Fire Department Regulations all applicable Fire Code requirements. In addition, adequate access for emergency vehicles to the proposed multifamily units would be provided by the proposed new road. It should be noted the El Segundo Fire Department (ESFD) has already reviewed the proposed Development Project site plans regarding fire protection and emergency access and approved them subject t to compliance with their standard conditions of approval.

Title 15 Chapter 27A of the ESMC allows for the City to impose Development Impact Fees on applicants seeking to construct development projects. The purpose of these fees is for applicants for development projects to pay their fair share of the costs of providing public services and public facilities, including fire protection services. The amount of each impact fee is calculated based upon the gross square footage of nonresidential development, number of residential dwelling units, type or density or intensity of use, vehicle trip generation, or other appropriate methodology which ensures that the fee is roughly proportional to the impacts of new development on public facilities (ESMC 15-27A-1). Therefore, the Project is not anticipated to affect fire protection demands to the extent that new or physically altered fire facilities would be required and impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

*a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered **police protection** facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The SPA would increase the maximum permissible building heights for future development within the SPA Sub-area by ten feet. This increased height of development could result in an incremental increase in the need for police protection within the SHSP. However, the increased development height on individual sites will still not exceed the overall growth

expected for buildout within the SHSP. Similar to the impacts identified in the SHSP EIR, impacts of the SHSPA related to police protection would be less than significant and no programmatic mitigation is required.

In 2018 the ratio for operational protection personnel was one sworn officer per 241 population. The SHSP EIR concluded the SHSP would incrementally increase the population but also increase the number of employees in the City which would incrementally increase in the CPD service ratio. The EIR also concluded that demand for police protection personnel or equipment from the SHSP would not exceed the current CPD operation standards.

The additional office space proposed by the Project would require an incremental increase in police protection services. The El Segundo Police Department (ESPD) provides police protection in the City. The ESPD's headquarters are located at 348 Main Street at the Civic Center Complex, approximately 1.1 mile northwest of the Project site. The City is divided into two geographic areas bisected by Pacific Coast Highway. The area west of Pacific Coast Highway is designated the West Command and the area east of Pacific Coast Highway is designated the East Command. The Project site would be located within the ESPD West Command.

In addition, Title 15 Chapter 27A of the ESMC allows for the City to impose Development Impact Fees on applicants seeking to construct development projects. The purpose of these fees is for applicants for development projects to pay their fair share of the costs of providing public services and public facilities, including law enforcement. The amount of each impact fee is calculated based upon the gross square footage of nonresidential development, number of residential dwelling units, type or density or intensity of use, vehicle trip generation, or other appropriate methodology which ensures that the fee is roughly proportional to the impacts of new development on public facilities (ESMC 15-27A-1). Therefore, the Project is not anticipated to affect police protection demands to the extent that new or physically altered police facilities would be required. Impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

*a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered **schools**, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

The SPA would increase the maximum permissible building heights within the SPA Sub-area by ten feet. The additional non-residential development that could be built within the SHSP would not be expected to generate any significant number of additional students that would need to be served by the El Segundo Unified School District. There is a potential for new SHSP employees to move into the City who may have children, and state law allows students to attend schools in the districts in which their parents work. However, it is not anticipated that the SHSP would significantly affect existing school services or facilities. Future development within the SHSP would be required to pay applicable school/developer impact fees so impacts would be less than significant and no programmatic mitigation is required.

The additional office space proposed by the Project would not be expected to generate any significant number of additional students that would be served by local schools within the El

Segundo Unified School District. The SHSP EIR noted the SHSP would result in intensified commercial and industrial uses. No schools are located within the Smoky Hollow Specific Plan area boundaries. Residential uses within SHSP area are limited and the only new residential type uses allowed would be caretaker units, permitted as an accessory use only. Under state law, the payment of school impact fees is considered full project mitigation under CEQA. The EIR concluded that construction of new schools or alteration to existing school facilities would not result from with implementation of the SHSP.

The proposed Project does not include the construction of any residential dwelling units, including caretaker units or accessory dwelling units (ADUs). There is a potential for the employees to move within the vicinity of the Projects who may have children, and state law allows students to attend schools within the districts in which their parents work. However, it is not anticipated that the Project would significantly affect existing school services or facilities. The proposed Project would pay all applicable local school developer impact fees. Therefore, impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

*a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered **parks**, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

The SPA would increase the maximum permissible building heights within the SPS Sub-area by ten feet. The additional non-residential development that could be built within the SHSP under the SPA would not be expected to generate any additional population or residents and thus no increased need for park facilities or programs. Therefore, impacts of the SPA on parks would be less than significant and no programmatic mitigation is required.

The Project will provide a 5,000-square foot public park (0.11-acre) within the North Site along with seating and a coffee café as a community benefit. The Project does not include any residential uses which would typically generate an increased need for additional park facilities and programs.

In addition, Title 15 Chapter 27A of the ESMC allows for the City to impose Development Impact Fees on applicants seeking to construct development projects. The purpose of these fees is for applicants for development projects to pay their fair share of the costs of providing public services and public facilities, including parks. The amount of each impact fee is calculated based upon the gross square footage of non-residential development or other appropriate methodology which ensures that the fee is roughly proportional to the impacts of new development on public facilities (ESMC 15-27A-1). Therefore, the Project is not anticipated to affect park demands to the extent that new or physically altered park facilities would be required. Impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

*a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered **public facilities**, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The SPA concerns maximum allowable building heights. The additional non-residential development that could be built under the SHSP, including if the SPA is adopted, would not be expected to generate any significant number of additional population or residents, so there would be no increased need for other public facilities. Therefore, impacts would be less than significant and no programmatic mitigation is required.

The Project does not include any residential uses which would typically generate increased population/residents or additional need for other public facilities. The SHSP EIR did not anticipate significant additional impacts on other public facilities, including the El Segundo Public Library, due to the nature of the SHSP (i.e., non-residential). The eventual adaptive reuse of existing structures and intensifying land uses could eventually lead to an increase in the local daytime (employee) population some of whom may use library services.

It should also be noted that non-residential development is not subject to the City of El Segundo Library Service fees because the fee study prepared to establish the library fee did not find a strong link between non-residential development and library service impacts.

Based on this analysis, impacts of the Project on other public facilities will be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA could change building heights but no other design characteristics of new development within the SPA Sub-area. Therefore, the SPA will not affect the provision of public services in the SHSP. With approval of the SPA, the Development Project will be consistent with the SHSP and would not require levels of public services beyond what were anticipated in the SHSP and analyzed in the EIR. Therefore, the SPA and Development Project will not make significant contributions to any cumulative impacts relative to public services in the region.

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	■	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	■	☐

Residents and employees in the Project area require park facilities and services for living within an urban area. New development must be evaluated to assure it is within the recreational and parkland service capabilities of local jurisdictions. There are four City parks within a mile of the Development Sites, all to the northwest, including Wyle Park, Hilltop Park, the large El Segundo Parks and Recreation complex, and Library Park, as well as Freedom Park a mile to the northeast.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The SPA would increase maximum permissible building heights within the SPA Sub-area by ten feet. The additional non-residential development that could be built within the SHSP under the SPA would not be expected to generate any additional population or residents (which are typically associated with new housing/residential development). The SPA addresses only building height and so would not result in an increased need for park facilities or programs. Therefore, impacts would be less than significant and no programmatic mitigation is required.

In addition, Title 15 Chapter 27A of the ESMC allows for the City to impose Development Impact Fees on applicants seeking to construct development projects which represent a project's fair share costs to the City for public services and facilities, including parks. The amount of each impact fee is calculated based upon the gross square footage of non-residential development or other appropriate methodology which ensures that the fee is roughly proportional to the impacts of new development on public facilities (ESMC 15-27A-1).

The Project is part of the SHSP and proposes to construct new office uses which would only result in an incremental increase in the need for regional or local parks and recreational services. The Project will provide a 5,000-square foot public park (0.11-acre) within the North Site along with seating and a coffee café as a community benefit. The Project does not include any residential uses which would typically generate new residents who would

have increased needs for additional park facilities and programs. Therefore, the Project is not anticipated to affect park demands to the extent that new or physically altered park facilities would be required, or that substantial physical deterioration of a recreational facility would occur or be accelerated. Impacts would be less than significant and no mitigation is required

LESS THAN SIGNIFICANT IMPACT

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The SPA would increase maximum permissible building heights within the SPA Sub-area by ten feet. The additional non-residential development that could be built within the SHSP under the SPA would not be expected to generate any increased need for the construction of park facilities. Therefore, impacts would be less than significant and no programmatic mitigation is required.

Title 15 Chapter 27A of the El Segundo Municipal Code allows the City to impose Development Impact Fees on applicants seeking to construct development projects. The fees represent a project's fair contribution to the City's increased costs for public services and facilities, including parks. The amount of each impact fee is calculated based upon the gross square footage of non-residential development or other appropriate methodology which ensures that the fee is roughly proportional to the impacts of new development on public facilities (ESMC 15-27A-1).

Therefore, the Project will have not require the construction or expansion of new City recreational facilities that could have unanticipated environmental impacts. However, the proposed Project will construct new office uses which would only result in a slight incremental increase in the use of regional or local parks generated by new employees. In addition, the Project will construct a 5,000-square foot (0.11-acre) public park. Therefore, any impacts will be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA and Development Project propose non-residential land uses so they will have less than significant direct or cumulative impacts relative to recreation facilities or programs.

17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	■	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	■	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
d. Result in inadequate emergency access?	☐	☐	■	☐

A number of transportation modes are needed as an integral part of living and working in an urban environment. CEQA requires an evaluation of new development to determine if it will contribute to or at least not conflict with the provision of non-vehicular methods of transportation (i.e., pedestrians, bicyclists, transit riders). It must also demonstrate it will not interfere with emergency vehicle access or will create unsafe road or intersection conditions. Finally, new development must be consistent with state and local plans to reduce the number of vehicle miles traveled on a regional basis to improve the quality of life for all residents.

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The SPA concerns maximum building height which would not increase the FAR, overall intensity, or total square footage of development on particular development sites within the SBA Sub-area. As of July 2020, CEQA documents were no longer required to analyze traffic impacts related to Level of Service (LOS) which is a measure of street and intersection congestion but rather impacts based on vehicle miles traveled (VMT). Increased building heights may have a programmatic effect on VMT for specific projects, but the City's development review process requires an assessment of potential VMT impacts for new projects using the City's draft VMT guidelines. This is considered regulatory compliance and not mitigation under CEQA.

It should be noted the SHSP EIR stated that, without the SHSP and any improvements, LOS impacts (i.e., congestion) at two area intersections along Pacific Coast Highway

(previously Sepulveda Boulevard) at both El Segundo Blvd. and Grand Ave. would approach or exceed City standard (LOS D or better during peak periods (DEIR Table 18-8). The SHSP proposed various road improvements to El Segundo Blvd., Franklin Ave., Grand Ave., and a number of roads and alleys to improve overall area circulation. In addition, the traffic study and SHSP EIR recommended Mitigation Measures 18-1 and 18-2 to reduce local traffic congestion impacts. However, LOS is no longer a consideration of traffic impacts under CEQA but can still be considered for planning and engineering purposes (as well as public safety). Therefore, the two "measures" 18-1 and 18-2 are no longer considered "mitigation" and are not carried forward as environmental issues in this CEQA document but will be included as conditions of approval for planning and engineering purposes.

Regarding non-vehicular transportation, the SHSP EIR determined the SHSP would not affect or impede the two transit lines (the Lunchtime Shuttle and Beach Cities Line 109) that traverse Grand Avenue since no physical changes were proposed to Grand Avenue. Additional growth that would result from SHSP implementation would likely increase ridership along these lines over time. In addition, the SHSP includes a system of bike-friendly streets that would link to other bike routes and paths currently proposed in the City as well as provide sidewalk improvements and other enhanced pedestrian facilities. Since the EIR determined impacts in this regard were less than significant for the SHSP, therefore impacts of the SPA would also be less than significant and no programmatic mitigation is required.

Development of the Project would not affect or impede the two transit lines (the Lunchtime Shuttle and Beach Cities Line 109) that traverse Grand Avenue since no physical changes are proposed to Grand Avenue. Additional growth that would result from SHSP implementation, including the proposed Project, would likely increase ridership along these lines over time. In addition, the SHSP includes a system of bike-friendly streets that would ultimately link to other bike routes and paths currently in or proposed in the City, as well as provide sidewalk improvements and other enhanced pedestrian facilities.

Therefore, the Project will not conflict with a program, plan, ordinance or policy addressing the City of SHSP circulation system. Impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

SB 743 was approved by the California legislature in September 2013 and requires changes to CEQA to use an alternative metric for transportation impacts. The old metric was based on vehicular "level of service" (LOS) which measures congestion of local intersections and roadways. As of July 2020, the new CEQA metric for transportation projects will be Vehicle Miles Traveled (VMT). The SHSP EIR was adopted in 2018 and did not include a quantitative analysis of the SHSP's potential VMT impacts.

The SPA concerns maximum permissible building height which would not increase the FAR, overall intensity, or total square footage of development on particular development sites within the SPA Sub-area. The SPA may incrementally increase development intensity on certain site within the SPA Sub-area, which would only have indirect or incremental impacts on VMT conditions. The issue of VMT impacts only arises for specific developments

proposed on specific sites. The City's development review process requires an assessment of potential VMT impacts for new (specific) projects using the City's adopted VMT guidelines. This is considered regulatory compliance and not mitigation under CEQA. Therefore, program-level VMT impacts of the SPA itself will be less than significant and no programmatic mitigation is required.

A VMT Analysis was prepared for the proposed Project by Translutions Inc. in August 2021 (Appendix D) based on the Draft SB 743 Implementation Guidelines (City of El Segundo, September 16, 2020). The City recommends using Work VMT per employee for office and employment projects. Based on the Guidelines, the City has set an impact threshold based on 15% below the Southern California Association of Governments (SCAG) regional Work VMT. The 15% reduction is based on the OPR technical advisory. Therefore, a project would result in a significant VMT impact if the project's Work VMT/Employee is greater than 85% of the existing SCAG regional VMT. Therefore, an office project would have a significant impact if the project work VMT per employee is greater than 17.0 VMT/Employee (see Table 7).

The VMT analysis used the 2016 SCAG Regional Transportation Plan (RTP) model with 2020 Socio-Economic Data (SED). This is the latest model available at this time and is the same model used for the City's guidelines. The Development Sites are located in traffic analysis zone (TAZ) 21125100. Consistent with standard modeling practice to isolate project VMT, the existing land uses in the TAZ were moved to the adjacent TAZ (21125200). The Project land uses were converted to employees using a factor of 471 square feet per employee based on the SCAG Employment Densities Study.

Table 7, Project VMT Impacts, demonstrates that the Project VMT/employee is 19.3 miles, which is greater than the threshold of 17.0 miles. Therefore, the Project is required to reduce its VMT/employee to 17.0 (i.e., by 11.7%) to have a less than significant impact.

Table 7: Project VMT Impacts

Base Year Characteristics	Project Characteristics
Total Employment	209
Total Homebased Work VMT	3,910
Project VMT per Employee	**19.3**
City Threshold	**17.0**
Significant Impact?	Yes
Percentage Over Threshold	13.3%
Mitigation Reduction Required	11.7%

Source: Table A, VMT Memorandum, Standard Works Project, Translutions 2021

The VMT Assessment noted the Project's VMT is expected to be up to 35% lower than estimated in the City's model because the Project is significantly more dense than the existing TAZ and the default parameters included in the ITE Trip Generation rates. However, as a worst case condition the assessment gave the Project no "credit" for this reduction due to the Project's design.

The City's guidelines states that if a significant transportation impact is identified, feasible mitigation measures to avoid or reduce the impact must be identified. The Governors' Office of Planning and Research (OPR) provides a list of potential measures to reduce VMT but gives the lead agency full discretion in the selection of mitigation measures. **Mitigation Measures VMT-1 through MM VMT-6** are generally from the California Air Pollution Control Officers Association (CAPCOA) recommendations found in the publication Quantifying Greenhouse Gas Mitigation Measures (2010).

Mitigation Measures. The CAPCOA document provides maximum VMT reductions from various mitigation measures. Mitigation Measures MM VMT-1 through VMT-6 outlined below are recommended for the proposed Project with implementation to be documented prior to receiving a certificate of occupancy:

MM VMT-1 **Unbundle Parking Cost.** This measure implements workplace parking pricing and unbundles the cost of parking from the lease. The Project shall include parking in the access-controlled parking structure. The property owner shall include language in the lease agreement which provides reduced lease rates if parking is not required by the tenant. The developer shall implement a monthly cost for parking spaces by charging a parking fee per access card. The range of VMT reduction from this measure is between 2.6% and 13%. **Based on the calculations, a $50 per month/employee parking cost will result in a VMT reduction of 5.1%.**

MM VMT-2 **Parking Management Strategies.** Strategies to encourage efficiency in parking facilities and improve the quality of service to parking users results in reduction of VMT. This includes signage and directions, providing preferential carpool/vanpool parking spaces closer to the building entrance to and from the destination, etc. This encourages carpooling/vanpooling and also reduces the amount of time patrons drive around to find the best parking area to minimize walking. **The maximum reduction from this measure is 3%.**

MM VMT-3 **Mandatory Travel Behavior Change Program, Promotions & Marketing.** This involves the development of a travel behavior change program that targets individuals' attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The project shall provide a web site that allows employees to research other modes of transportation for commuting. If a website is planned for the development, links to Google Transit, and/or local bus operators should be provided on the website. If a website is not planned, QR Codes could be provided in the parking structure and the building lobbies to enable users an easy way to access information about transit routes. **The maximum reduction due to this measure is 1%.**

MM VMT-4 **Implement Commute Trip Reduction Marketing.** This involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices with passive educational and promotional materials. The project shall implement marketing strategies to reduce commute trips. The project will implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip reduction strategies. Implementing commute trip reduction strategies without a

complementary marketing strategy will result in lower VMT reductions. Marketing strategies may include new employee orientation of trip reduction and alternative mode options, event promotions, and printed material. CAPCOA states that the range of reduction is between 0.8% to 4%, but states that in some literature, the VMT reduction has been as much as 15%, especially for urban areas. **For this project, a conservative reduction of 3% has been assumed.**

MM VMT-5 **Include Bike Parking in Excess of City Code.** This implements short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations. Based on discussion with the applicant, bike parking in excess of City code shall be provided. The City's code requires a minimum of 4 spaces for non-residential buildings up to 15,000 square feet, plus a minimum of 5 percent of the required vehicle spaces for the portion above 15,000 square feet. The maximum number of bicycle parking required under City code is 25 spaces. For the project, the number of bicycle parking spaces required under code is 17 spaces, and therefore, it is recommended that the project provide at least 18 spaces. **This results in a VMT reduction of 0.625%.**

MM VMT-6 **Include Secure Bike Parking and Showers.** This implements additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel. Based on discussion with the applicant, each building shall include shower facilities and secure bike parking facilities shall be provided. **This results in a VMT reduction of 0.625%.**

The VMT Assessment determined that implementation of Mitigation Measures MM VMT-1 through MM VMT-6 will reduce Project VMT by 13.35% or to a total of 16.85 miles which is less than the City's threshold of 17.0 miles (Table B, Translutions 2021). With implementation of the recommended mitigation, the Project is consistent with CEQA Guidelines Section 15064.3, subdivision (b) regarding VMT impacts.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Regarding the SPA, the SHSP has a standard grid pattern of streets with a hierarchy of major, collector, and local streets, and local police and fire facilities are just west of the SHSP area. The SPA addresses building heights and has no effect on street design. The SPA deals only with maximum permissible building heights and would not increase total square footage of development, so it will not increase anticipated traffic from the SPA Sub-area. Therefore, the SPA will have less than significant impacts relative to design hazards or incompatible uses and no programmatic mitigation is required.

The proposed Project is part of the SHSP grid pattern of streets and is located along one major street (El Segundo Boulevard) and three secondary streets (E. Franklin Street, Kansas Street, and Oregon Street). The Project site plans (Exhibits 8 and 9) show the proposes buildings are on major or secondary streets and have immediate and adequate access to those streets. The site plans also show the immediate surrounding area has no identified road or intersection design hazards. In addition, the proposed office uses of the Project are consistent with planned uses under the SHSP and surrounding land uses. The

SHSP EIR stated that future development within the SHSP (like the proposed Project) would not create any localized traffic hazards due to the type and layout of planned land uses within a standard grid street system. All designs and alterations would be performed in accordance with all applicable standards relating to motorized vehicle, bicycle, and pedestrian safety.

Therefore, the Project will have less than significant traffic impacts relative to road, intersection, or site plan design hazards or incompatible uses. Impacts will be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

The SHSP has a standard grid pattern of streets with a hierarchy of major, collector, and local streets, and local police and fire facilities are just west of the SHSP area. The SPA would not increase total square footage of development, so it will not increase anticipated traffic from the SPA Sub-area or change the need for emergency access. Therefore, the SHSPA will have less than significant impacts relative to emergency access and no programmatic mitigation is required.

The SHSP area has a grid pattern of streets with a hierarchy roadways. The proposed Project is part of the SHSP grid pattern of streets and is located along one major street (El Segundo Boulevard) and three secondary streets (E. Franklin Street, Kansas Street, and Oregon Street) which provide emergency access to both of the Development Sites. It should be noted the Project is not changing the overall onsite or offsite access to the Development Sites. The SHSP EIR stated that implementation of future projects under the SHSP (like the proposed Project) would be reviewed to ensure new development would not create barriers to emergency response vehicles. In addition, the proposed Project is not changing any public roadways or overall vehicular access to the two sites, so long-term emergency access to the site will not be affected by Project development. It should be noted the El Segundo Fire Department (ESFD) has already reviewed the proposed Development Project site plans regarding fire protection and emergency access and approved them subject to compliance with their standard conditions of approval.

For these reasons, the Project will have less than significant traffic impacts relative to emergency access and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impacts. The SPA would increase building heights within the SPA Sub-area but would not affect FAR or overall building square footages of new development beyond that allowed in the SHSP and evaluated in the SHSP EIR. Therefore, the SPA will not affect VMT of future development projects. The VMT study for the proposed Development Proiect indicates it will have less than significant VMT impacts with implementation of the recommended mitigation. Therefore, the SPA and Development Project will make less than significant contributions to cumulatively considerable regional VMT impacts.

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	■	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐

The LA Basin has been inhabited for thousands of years by various Native American tribes. CEQA requires coordination between the tribes and local governments to assure that tribal cultural resources are not being significantly impacted by new development.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence,

to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

(a-b) The proposed SPA would increase the maximum allowable building heights on individual development sites within the SPA Sub-area by ten feet. However, future development would still be required to comply with CEQA, federal and state laws regarding archaeological and/or tribal resources, including consultation, and the City's development review process. Therefore, the SHSPA will have less than significant impacts regarding tribal cultural resources and no programmatic mitigation is required.

The City's General Plan (EIR indicates that the Tongva and Chumash Native American tribes inhabited this area for thousands of years, but it is likely that prior development has likely destroyed any artifacts if they were present. The SHSP EIR indicates the SHSP and surrounding areas have not been identified as containing significant tribal resources or are part of a cultural landscape by any local tribes. However, there is a potential for discovery of Native American tribal resources during grading and contact with such resources during construction activities could result in significant impacts. The SHSP EIR concluded that implementation of **Mitigation Measures CUL MM 8-2 and CUL MM 8-3** (in sub-section 5.b) would reduce these potential impacts to less than significant levels.

Regarding the Development Sites, AB 52 requires consultation with Native American tribes that are traditionally and culturally affiliated to the geographic area where a project is located for any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015. In order to participate in AB 52 tribal consultation, a tribe must request, in writing, to be notified by lead agencies through formal notification of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated.

SB 18 requires that, prior to the adoption or amendment of a city or county's general plan, the city or county conduct consultations with California Native American tribes for the purpose of preserving specified places, features, and objects that are located within the city's jurisdiction. SB 18 requires the city to send a letter to each contact on the SB 18 list, extending an invitation for consultation. Native American tribes then have 90 days from receipt of the letter to request consultation. The city must also send a notice to all contacts 45 days prior to adopting an amended General Plan, as well as a third notice 10 days prior to any public hearing regarding a General Plan amendment.

The environmental document for the Project is an IS/MND. In addition, the Project includes an amendment to the SHSP and Site Plan Review. The Project would also require public hearings before both the City of El Segundo Planning Commission and City Council prior to Project approval.

One California Native American tribe, the Gabrieleño Band of Mission Indians–Kizh Nation, has notified the City of El Segundo with a request to be notified of pending projects that are being reviewed in accordance with the City's local CEQA implementation procedures. A formal notification regarding this Project proposal and the City's environmental review process was sent to the Kizh Nation on January 27, 2021, and the Kizh Nation subsequently submitted correspondence requesting further consultation.

On March 24, 2021, the City participated in a conference call with Andy Salas and Matt Teutimez, representatives of the Kizh Nation, to commence the tribal consultation process. Mr. Salas and Mr. Teutimez stated that significant tribal cultural resources have been

previously unearthed in the broader Project area and that this area was historically utilized as significant Native American trade route and community gathering place in the region. The tribal consultation is currently ongoing.

In addition, the City consulted with Robert Dorame, Tribal Chairman of the Gabrielino Tongva Indians of California (GTIC) on September 17, 2021 in compliance with AB-52 and SB-18.

As a result of the consultation with the Kizh Nation and the GTIC, **MM-TCR-1** is being proposed in the event of any discovery of unknown tribal cultural resources during earthwork. This mitigation measure can be updated prior to concluding tribal consultation with the Gabrieleño Band of Mission Indians - Kizh Nation and the Gabrielino Tongva Indians of California as appropriate.

Mitigation Measures. SHSP EIR **CUL MM 8-2 and CUL MM 8-3**, as outlined in sub-section 5.b, Cultural Resources, are applicable to development of the Development Sites, in addition, the following Mitigation Measure TCR-1 addresses impacts related to Tribal Cultural Resources:

MM-TCR-1 **Native American Monitoring.** Prior to the commencement of any ground disturbing activity at the Project site, the Project applicant shall retain Native American Monitors approved by the Gabrieleño Band of Mission Indians-Kizh Nation and the Gabrielino Tongva Indians of California, the tribe that consulted on this Project pursuant to AB 52 and SB 18 (the "Tribes" or the "Consulting Tribes"). Copies of the executed contracts shall be submitted to the City of El Segundo Development Services Department prior to the issuance of any permit necessary to commence a ground-disturbing activity.

The Tribal monitors shall only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribes as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitors shall complete daily monitoring logs that will provide descriptions of the day's grading and related earth-disturbing activities, including type and extent of construction activities, location of work, soil and any cultural materials identified, or other items potentially related to cultural resources. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Tribal Representatives and Tribal Monitors have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by Project activities shall be evaluated by the Consulting Tribes approved Tribal monitors. If the resources are Native American in origin, the Consulting Tribes will retain it/them in the form and/or manner the Tribes deem appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and

(2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]).

With the implementation of Mitigation Measures CUL MM 8-2, CULMM 8-3, and TCR-1, potential impacts to tribal cultural resources would be reduced to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Cumulative Impacts. The SPA addresses only building heights within the SPA Sub-area and will not increase FAR, new building footprints, or total allowable building area of new development. Therefore, it will have no impact on construction activities that could disturb previously unknown tribal cultural resources. In addition, the Development Project proposes no increase in FAR or overall square footage of development which could disturb tribal cultural resources. Therefore, the SPA and Development Project will not contribute to any cumulative impacts regarding tribal cultural resources, including the discovery of any Native American human remains.

19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	■	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	■	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	■	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	■	☐

Residents and employees in the Project area require a variety of utility services including water, sewer, and solid waste. New development must be evaluated to assure it is within the service capabilities of local companies and jurisdictions that provide these utilities.

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The SPA would increase maximum permissible building heights for future development within the SPA Sub-area by ten feet, but would not allow for more intensive development or more total overall square footage than under the current SHSP. This increased height of development would not result in a substantial increase in water consumed and wastewater and solid waste generated in the SHSP. The development on individual sites will still not exceed the overall growth expected for buildout within the SHSP. Impacts would be less than significant and no programmatic mitigation is required.

The Project is part of the SHSP and will construct a net of 90,172 square feet of new office uses within the SHSP area. These uses will generate approximately 120 new employees who will consume additional water and generate additional wastewater and solid waste. Specific estimates for additional water consumed, wastewater generated, and solid waste generated are provided in sub-sections 17.b, 17.c, and 17.d respectively.

The EIR estimated the SHSP would develop over 517,000 square feet of new commercial, industrial, office, and other uses and generate a total of 951 additional employees and up to 18 additional residents (max. 3 persons per caretaker unit). The office development proposed for the Project is well within the growth estimates for the SHSP as a whole, representing 18.1 percent of the new building square footage planned within the SHSP.

Since the proposed Project is part of the SHSP, it is also expected to have less than significant impacts regarding the existing storm drain system. In addition, neither the SHSP or the Project will substantially increase the need or infrastructure to provide electricity, natural gas, or telecommunications. Impacts for all utility systems are expected to be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The SPA would increase maximum permissible building heights for future development within the SPA Sub-area by ten feet, which would not allow for higher FAR, more intensive development, or more total square footage on sites than under the current SHSP. This increased height of development could result in incremental increases in water consumed in the SHSP. However, the increased development height on individual sites will still not exceed the overall growth expected for buildout within the SHSP. Impacts would be less than significant and no programmatic mitigation is required.

The SHSP EIR indicated the City's projected water supply for 2035 was 17,750 Acre-Feet Per Year (AFY) and the current (then 2018) projected demand for water supply in 2035 during a single dry year was 17,250 AFY, as shown in DEIR Table 19-4. A 500 AFY surplus was anticipated based on the projected water demands for a single dry year in 2035. Projections indicate that supply and demand from 2020 to 2035 vary and the City imports all water supplies to meet its water demands. The SHSP EIR determined the SHSP would result in a net increase in water demand of 118.38 AFY but sufficient water supplies were available to serve buildout of the SHSP area.

The proposed Project is part of the SHSP and will construct a net of 90,172 square feet of new office uses within the SHSP area which will consume approximately 12,000 gallons of water per day or 13.4 acre-feet of water per year. The Project will make connections and improvements as necessary to provide adequate water service for the 120 future Project

employees[14]. By comparison, the SHSP EIR estimated the entire SHSP would develop over 517,000 square feet of new commercial, industrial, office, and other uses and generate a total of 951 additional employees. Therefore, the development proposed for the Project is well within the growth estimates for the SHSP as a whole, representing a maximum of 18.1 percent of the new building square footage planned under the SHSP (90,172 vs. 517,000). The Project will also make connections and improvements as necessary to provide adequate utility service for the future employees.

Future development within the SHSP would have to comply with the City's Municipal Code water conservation measures such as drought-tolerant landscaping, water conservation measures to minimize water consumption, and use of recycled water which would decrease the projected water demand needs for the City. The EIR concluded that implementation of the SHSP would not increase system demands to require new facilities or result in infrastructure improvements beyond those projected by the City Public Works Department.

Based on this analysis, potential impacts of the Project on water supplies will be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The SPA would increase maximum permissible building heights for future development within the SPA Sub-area by ten feet, but would not allow for higher FAR, more intensive development, or more total square footage on sites than under the current SHSP. This increased height of development would not result in incremental increases in water consumed and wastewater and solid waste generated in the SHSP. The increased development height on individual sites will still not exceed the overall growth expected for buildout within the SHSP. Impacts would be less than significant and no programmatic mitigation is required.

The Project is part of the SHSP and will construct a net of 90,172 square feet of new office uses within the SHSP area which will generate approximately 6,000 gallons pf wastewater per day. The Project will make connections and improvements as necessary to provide adequate wastewater service for the 120 future Project employees[15].

The SHSP EIR stated that implementation of the SHSP would result in an additional net wastewater generation of 42,951.2 gallons per day, which would remain consistent with the capacity of existing facilities. In 2018 the City's sewer flow was 2.66 million gallons per day (mgd) of which 1.17 mgd was conveyed to the Hyperion Plant with the remaining volume conveyed to other facilities of the Sanitation District of Los Angeles County (SDLAC). The City's capacity was 2.75 mgd so the remaining capacity on the system was 0.9 mgd. Therefore, the EIR concluded that implementation of the SHSP would not result in the need for construction of new water or wastewater facilities, or expansion of existing facilities.

Therefore, impacts with respect to projected wastewater generation and infrastructure needs would be less than significant and no mitigation is required.

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[14] 90,172 square feet of office uses divided by 750 square feet per office employee equals new 120 employees times 100 gallons per person per day of water consumed equals 12,000 gallons per day of water which equals 13.4 acre-feet.

[15] 90,172 square feet of office uses divided by 750 square feet per office employee equals new 120 employees times 50 gallons per person per day equals 6,000 gallons per day of wastewater.

LESS THAN SIGNIFICANT IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Solid Waste Infrastructure. The EIR estimated the total solid waste generated by occupants (not residents) and employees by implementation of the SHSP would be 2,216.17 cubic yards (CY) per year. Current disposal facilities include the Chiquita Canyon, Scholl Canyon, and Sunshine Canyon landfills which will continue to remain in operation. In 2018, the EIR indicated the Scholl Canyon landfill had a remaining capacity of 9.9 million CY, Sunshine Canyon landfill had a remaining capacity of 96.8 million CY, and the Chiquita Canyon landfill had a remaining capacity of 8.6 million CY. The EIR concluded the landfills serving the SHSP area had sufficient capacity to accommodate the additional solid wastes generated by the SHSP. Therefore, impacts would be less than significant and no mitigation was required assuming compliance with the City's waste reduction programs.

The SPA would increase maximum permissible building heights for future development within the SPA Sub-area by ten feet, but would not allow for higher FAR, more intensive development, or more total square footage on sites than under the current SHSP. This increased height of development would not result in increased solid wastes generated in the SHSP or the ability of the County to dispose of the additional generated wastes. Impacts would be less than significant and no programmatic mitigation is required.

The Project will construct 90,172 square feet of new office uses within the SHSP area which will generate additional solid waste. The additional 120 employees of the Project will generate approximately 1,200 pounds or 0.6 tons of solid waste per day assuming 10 pounds per person per day (CIWMB 2021). By comparison, the SHSP EIR estimated the SHSP would develop over 517,000 square feet of new commercial, industrial, office, and other uses and generate a total of 951 additional employees. The development proposed for the Project is well within the growth estimates for the SHSP as a whole, representing 18.1 percent of the total new building square footage planned under the SHSP.

Based on the preceding analysis, impacts of the Project relative to solid waste disposal will be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

f. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

New development on sites within the SHSP would still be required to comply with the City's recycling and source reduction programs. Impacts would be less than significant and no programmatic mitigation is required.

Regarding the Project, Sub-section 19.e above indicates the Project is part of the SHSP and would generate additional solid waste, but it will not create additional non-residential development to the degree that the available landfill capacity would be exceeded. The Project will be required to be consistent with existing solid waste regulations implemented by the City.

The Project would be required to comply with state regulations pertaining to solid waste as managed by the City. Therefore, the Project's impacts with respect to federal, state, and local statutes and regulations related to solid waste would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

Cumulative Impact. The SPA would increase buildings heights within the SPA Sub-area but would not affect FAR or total building square footage of new development. Therefore, the SPA would not increase utility demand over that identified in the SHSP EIR and would have less than significant impacts on local water, sewer, and other utility systems and services. The Development Project would increase demand for utility services above current levels due to the increased amount of development proposed for the two sites. However, this Initial Study indicates that anticipated utililty demands can be met without significant impacts to utility infrastructure. Therefore, the SPA and Developent Project will incrementally increase the demand for utility services but will not contribute to regionally significant cumulative impacts on utilities or service systems.

20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	■
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	■
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

Due to many physical conditions, the Los Angeles Basin, which includes the proposed Project area, has a significant risk of wildfires in areas with extensive natural vegetation and at the urban/wildland interface. CEQA new requires an assessment of new development to determine if it will exacerbate wildland fire risks or interfere with the ability to provide effective fire protection services to these areas.

a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

(a-d) The SHSP EIR stated there were no wildland areas in or adjacent to the SHSP. In addition, there are no state responsibility areas in the SHSP or the City. Therefore, there were no impacts to or from future development within the SHSP related to wildland fires (i.e., wildfires) and no programmatic mitigation is required.

Future buildings under the SHSPA may be taller than currently allowed, but there are no wildland areas in or adjacent to the SHSP. The City is a highly urbanized area and no part lies within a Very High Fire Hazard Severity Zone.

The two Development Sites are within the SHSP area and the SHSP EIR indicates the Specific Plan is not within a wildland fire risk area or a high or very high fire hazard severity zone. Therefore, the Project would have no impacts related to high fire zones and no mitigation required.

NO IMPACT

Cumulative Impacts. The SPA Sub-area, which includes the two Development Sites, is in a highly urbanized area with no open space or vacant land or areas of native vegetation nearby. Therefore, both the SPA and the Development Project would not contribute to any regional cumulative impacts related to wildfires.

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	☐
e. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	■	☐	☐
f. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

CEQA requires an evaluation of a number of topics referred to as "mandatory findings" including: (1) impacts to listed or otherwise protected species of plants, animals, or their habitat, or important and irreplaceable historical or archaeological resources; (2) impacts that may be individually limited but significant on a cumulative basis; and (3) impacts that would significantly harm human health or safety.

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The SPA concerns maximum building heights within the SPA Sub-area and the preceding analyses (Subsections 4 and 5) determined the SPA would have no or less than significant impacts on cultural or biological resources and no programmatic mitigation was proposed.

The Project is located within a highly urbanized area with no natural habitat. The preceding analyses (Subsections 4 and 5) determined that Project impacts to the natural habitat of a fish or wildlife species will be less than significant with implementation of **Mitigation Measures BIO MM 7-1 and BIO MM 7-2** to protect nesting birds. In addition, potential adverse impacts to archaeological resources, paleontological resources, or human remains will remain less than significant with implementation of **Mitigation Measures CUL MM 8-1 through CUL MM 8-3 and MM TCR-1** to monitor grading for possible cultural or fossil materials. Although the two onsite buildings are over 50 years in age, the Development Sites and their buildings were determined not to have any association with an important example of California's history or prehistory.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

The SPA concerns maximum building heights within the SPA Sub-area and the preceding analyses (Subsections 1-20) determined the SPA would have no significant individual or ay regional cumulative impacts and no programmatic mitigation is proposed.

The Project is within the SHSP and there are no residential uses or sensitive receptors adjacent to either of the Development Sites. For the Project, the preceding analyses (Subsections 1-20) did identify mitigation measures, either from the SHSP EIR or recommended in this document, for the following potential impact areas:

Biological Resources (**BIO MM 7-1 and 7-2**)

Cultural Resources (**CUL MM 8-1 through 8-3**)

Greenhouse Gas Emissions (**EECAP 4.1 and EECAP 5.2**)

Hazardous and Hazardous Materials (**MM HAZ-1 to HAZ-3**)

Geology and Soils (**MM GEO-1**)

Transportation (**MM VMT-1 to VMT-6**)

Tribal Cultural Resources (**MM TCR-1**).

However, the analyses also determined the Project would not make any significant contributions to cumulatively considerable regional impacts for any of the environmental issues evaluated, including air quality and greenhouse gas emissions, with implementation of these measures.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The SPA concerns maximum building heights within the SPA Sub-area and the preceding analysis determined the SPA would have no or less than significant impacts related to air quality, health risks, greenhouse gas emissions, hazardous materials or other hazards, or geology or soils and no programmatic mitigation is proposed for the SPA.

The Project is within the SHSP and there are no residential uses or sensitive receptors adjacent to either of the Development Sites. The preceding analyses (Subsections 3, 7-9,13, and 20) addressed the following environmental effects which have the potential to cause substantial adverse effects on human beings, either directly or indirectly:

Air Quality and Health Risks – Subsection 3 – Less Than Significant

Geology (groundshaking) – Subsection 7 – Less Than Significant with Mitigation Measure **MM GEO-1**

Hazards and Hazardous Materials – Subsection 8 – Less Than Significant with Mitigation Measures **MM HAZ-1 through HAZ-3**

Hydrology (flooding) – Sect 9 – Less Than Significant

Noise – Subsection 13- Less Than Significant

Wildfire – Subsection 20 – No Impact

The preceding analyses determined all of these potential impacts could be reduced to less than significant levels with the recommended mitigation measures.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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Summary of Mitigation Measures

* denotes measure is from the Smoky Hollow Specific Plan EIR

Biological Resources

BIO MM 7-1* To avoid impacts to nesting birds, construction activities and construction noise should occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occurs within the avian nesting season (during the period from February 1 to September 1), areas within 100 feet of a development site shall be thoroughly surveyed for the presence of nests by a qualified biologist no more than five days before commencement of any vegetation removal. If it is determined that the Project Site is occupied by nesting birds covered under the Migratory Bird Treaty Act, mitigation measure 7-2 shall apply.

BIO MM 7-2* If pre-construction nesting bird surveys result in the location of active nests, no grading, vegetation removal, or heavy equipment activity shall take place within an appropriate setback from occupied nests as determined by a qualified biologist. Protective measures (e.g., established setbacks) shall be required to ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code requirements. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts occur. A report of the findings, prepared by a qualified biologist, shall be submitted to the CDFW prior to construction-related activities that have the potential to disturb any active nests during the nesting season.

Cultural Resources

CUL MM 8-2* Prior to the commencement of grading or demolition of subsurface structures, a professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards, shall conduct a brief archaeological and paleontological informational session for construction personnel. The training session may consist of an in-person meeting or a written handout describing: (1) how to identify archaeological and paleontological resources that may be encountered during earth-moving activities and (2) the procedures to be followed in such an event, including

contact information for the appropriate entities if archaeological or paleontological resources are discovered.

CUL MM 8-3* In the event that archaeological or paleontological resources are unearthed during ground-disturbing activities, the ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find, where construction activities will not be allowed to continue until a qualified archaeologist or paleontologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Work shall be allowed to continue outside the buffer area. If the archaeologist identifies the find as a tribal cultural resource or suspects it to be a tribal cultural resource, the City will contact the Native American Heritage Commission (NAHC) to report the discovery, and will contact local Native American tribal representatives as directed by the NAHC. Should the newly discovered artifact(s) be determined to be a tribal cultural resource, Native American construction monitoring will be initiated. The City shall coordinate with the archaeologist and tribal representative(s) to develop an appropriate treatment plan for the resources.

CUL MM 8-4 If human remains are uncovered during Project grading, work must be halted in the immediate area of the find and the County Coroner notified in accordance with Health and Safety Code Section 7050.5. The Coroner must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of a Native American, they must contact the Native American Heritage Commission for further investigations and proper recovery of such remains, if necessary. Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "most likely descendant". The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Human remains from other ethnic/cultural groups with recognized historical associations to the area shall also be subject to consultation between appropriate representatives from that group and the local jurisdiction/lead agency involved. This measure shall be implemented to the satisfaction of the City Planning Department.

Geology and Soils

MM GEO-1 Prior to issuance of any grading or building permits, the applicant shall demonstrate that all improvements and construction-related activities comply with the recommendations outlined in the Project geotechnical report (CWI 2017). This measure applies to all potential geologic and soil constraints that could affect one or both sites, including but not limited to seismic ground failure, strong seismic shaking, differential settlement, liquefaction, lateral spreading, and subsidence, and landslides/slope stability as appropriate. This measure shall be implemented to the satisfaction of the City Engineer.

Greenhouse Gas Emissions

EECAP 4.1* *Encourage or Require Energy Efficiency Standards Exceeding Title 24.* This measure will develop City staff to be resources in encouraging and implementing energy efficiency beyond that required by current Title 24 Standards.

EECAP 5.2* *Promote Water Efficiency Standards Exceeding SB X7-7.* In addition to SB X7-7, more actions are being studied or have been taken to exceed water efficiency standards. These efforts include education and outreach practices that could be combined with residential and commercial EECAP actions that emphasize the reuse of recycled/gray water and promote harvesting rainwater.

Hazards and Hazardous Materials

MM HAZ-1 Prior to issuance of a Certificate of Occupancy for the North Site (1330 E. Franklin Street), the applicant shall remove and properly decommission the vertical and lateral well network of the former vapor extraction system including abandonment of any groundwater monitoring wells and semi-permanent vapor probes on the property. This measure shall be implemented to the satisfaction of the City with input and regulatory oversight and written signoff by DTSC.

MM HAZ-2 Prior to issuance of a grading permit for the North Site (1330 E. Franklin Street), the applicant shall prepare and process a Soils Management Plan through the state Department of Toxic Substances Control (DTSC) for review and approval. Prior to issuance of a building permit, the applicant shall provide written confirmation from DTSC to the City that the Soil Management Plan has been implemented as approved.

MM HAZ-3 Prior to issuance of any demolition or building permits for South Site (1475 E. El Segundo Boulevard) or North Site (1330 E. Franklin Street), the applicant shall identify and effectively remediate any asbestos-containing materials (ACMs) associated with the onsite buildings. This remediation may be accomplished by either in-place encapsulation or removal as appropriate. The applicant shall retain a qualified asbestos contractor to conduct this work and shall provide the City with a final report within 45 days of completion of all remediation activities, including appropriate documentation of disposal of any onsite ACMs at an approved landfill. This measure shall be implemented to the satisfaction of the City Planning Department.

Transportation (VMT)

MM VMT-1 **Unbundle Parking Cost.** This measure implements workplace parking pricing and unbundles the cost of parking from the lease. The Project shall include parking in the access-controlled parking structure. The property owner shall include language in the lease agreement which provides reduced lease rates if parking is not required by the tenant. The developer shall implement a monthly cost for parking spaces by charging a parking fee per access card. The range of VMT reduction from this measure is between 2.6% and 13%. **Based on the calculations, a $50 per month/employee parking cost will result in a VMT reduction of 5.1%.**

MM VMT-2 **Parking Management Strategies.** Strategies to encourage efficiency in parking facilities and improve the quality of service to parking users results in

reduction of VMT. This includes signage and directions, providing preferential carpool/vanpool parking spaces closer to the building entrance to and from the destination, etc. This encourages carpooling/vanpooling and also reduces the amount of time patrons drive around to find the best parking area to minimize walking. **The maximum reduction from this measure is 3%.**

MM VMT-3 **Mandatory Travel Behavior Change Program, Promotions & Marketing.** This involves the development of a travel behavior change program that targets individuals' attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The project shall provide a web site that allows employees to research other modes of transportation for commuting. If a website is planned for the development, links to Google Transit, and/or local bus operators should be provided on the website. If a website is not planned, QR Codes could be provided in the parking structure and the building lobbies to enable users an easy way to access information about transit routes. **The maximum reduction due to this measure is 1%.**

MM VMT-4 **Implement Commute Trip Reduction Marketing.** This involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices with passive educational and promotional materials. The project shall implement marketing strategies to reduce commute trips. The project will implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip reduction strategies. Implementing commute trip reduction strategies without a complementary marketing strategy will result in lower VMT reductions. Marketing strategies may include new employee orientation of trip reduction and alternative mode options, event promotions, and printed material. CAPCOA states that the range of reduction is between 0.8% to 4%, but states that in some literature, the VMT reduction has been as much as 15%, especially for urban areas. **For this project, a conservative reduction of 3% has been assumed.**

MM VMT-5 **Include Bike Parking in Excess of City Code.** This implements short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations. Based on discussion with the applicant, bike parking in excess of City code shall be provided. The City's code requires a minimum of 4 spaces for non-residential buildings up to 15,000 square feet, plus a minimum of 5 percent of the required vehicle spaces for the portion above 15,000 square feet. The maximum number of bicycle parking required under City code is 25 spaces. For the project, the number of bicycle parking spaces required under code is 17 spaces, and therefore, it is recommended that the project provide at least 18 spaces. **This results in a VMT reduction of 0.625%.**

MM VMT-6 **Include Secure Bike Parking and Showers.** This implements additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel. Based on discussion with the applicant, each building shall include shower facilities and secure bike parking facilities shall be provided. **This results in a VMT reduction of 0.625%.**

Tribal Cultural Resources

MM-TCR-1 **Native American Monitoring.** Prior to the commencement of any ground disturbing activity at the Project site, the Project applicant shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation and the Gabrielino Tongva Indians of California, the tribes that consulted on this Project pursuant to AB 52 and SB 18 (the "Tribes" or the "Consulting Tribes"). Copies of the executed contracts shall be submitted to the City of El Segundo Development Services Department prior to the issuance of any permit necessary to commence a ground-disturbing activity.

The Tribal monitors shall only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribes as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitors shall complete daily monitoring logs that will provide descriptions of the day's grading and related earth-disturbing activities, including type and extent of construction activities, location of work, soil and any cultural materials identified, or other items potentially related to cultural resources. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Tribal Representatives and Tribal Monitors have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by Project activities shall be evaluated by the Consulting Tribes approved Tribal monitors. If the resources are Native American in origin, the Consulting Tribes shall retain it/them in the form and/or manner the Tribes deem appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]).