Environmental Assessment No. EA-971, Revision A

Public Review Initial Study/ Mitigated Negative Declaration

444 North Nash Street Data Center Project

November 2022

Lead Agency:

City of El Segundo
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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

This Initial Study has been conducted in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.). Pursuant to State CEQA Guidelines §15063, this Initial Study has been conducted to determine if the proposed 444 North Nash Street Data Center Project (Environmental Assessment No. EA-971, Revision A) ("Project") would have a significant effect on the environment.

The Project site comprises approximately 0.50-acre at the northern portion of an existing approximately 6.14-acre multi-tenant data center. The Applicant seeks approval of one entitlement - to amend Environmental Assessment No. EA-971 (a 2012 discretionary City approval for the existing data center and up to 14 emergency backup diesel generators) (generators) to increase the total number of allowable generators from 14 to 15. Prior operators have obtained South Coast Air Quality Management District (SCAQMD) permits to install 8 of the 15 generators. Therefore, this IS/MND evaluates up to seven additional generators for a total allowable of up to 15 generators for SCAQMD permitting purposes. Specifically, the Project proposes to install up to seven generators at the property's northeast corner - three at ground level and four on platforms. No change in land use or expansion in building floor area is proposed. These seven additional generators would support previously constructed interior electrical/equipment modifications, which would incrementally increase utility demand and result in up to five additional employees.[1]

Pursuant to State CEQA Guidelines §15063(c), the purposes of an Initial Study are to:

- Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a ND;
- Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND;
- Assist in the preparation of an EIR, if one is required;
- Facilitate environmental assessment early in the design of a project;
- Provide documentation of the factual basis for the finding in a ND that a project will not have a significant effect on the environment;
- Eliminate unnecessary EIRs; and
- Determine whether a previously prepared EIR could be used with the project.

This Initial Study is intended to be used as a decision-making tool for the Lead Agency and responsible agencies in considering and acting on the proposed Project. Responsible agencies

[1] Pursuant to Building Permit C0260-22.

would comply with CEQA by considering this environmental analysis for discretionary actions associated with Project implementation, if any.

State CEQA Guidelines §15063(g) specifies that as soon as a Lead Agency has determined that an Initial Study will be required for a project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain their recommendations as to whether an EIR, Mitigated Negative Declaration (MND), or ND should be prepared.

1.2 Summary of Findings

Pursuant to State CEQA Guidelines §15367, the City, as Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. This Initial Study has evaluated the environmental issues outlined in **Section 3.2: Environmental Factors Potentially Affected**. It provides decision-makers and the public with information concerning the Project's potential environmental effects and recommended mitigation measures, if any.

Based on the Environmental Checklist Form and supporting environmental analysis, the Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated:

- Air Quality
- Noise and Vibration
- Tribal Cultural Resources

As set forth in State CEQA Guidelines §15070, an Initial Study leading to a Mitigated Negative Declaration (IS/MND) can be prepared when the Initial Study identifies potentially significant effects, but: Project revisions would avoid or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment.

1.3 Initial Study Public Review Process

The Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration has been provided to the Clerk of the County of Los Angeles and mailed to responsible and trustee agencies concerned with the Project and other public agencies with jurisdiction by law over resources affected by the Project. A 20-day public review period has been established for the IS/MND in accordance with State CEQA Guidelines §15073. During the public review period, the IS/MND, including the Technical Appendices, was made available for review on the City website, at https://www.elsegundo.org/government/departments/development-services/planning-division/active-projects.

In reviewing the IS/MND, affected public agencies and the interested public should focus on the document's adequacy in identifying and analyzing the potential environmental impacts and the ways in which the Project's potentially significant effects can be avoided or mitigated.

Written comments on this IS/MND may be sent to:

Eduardo Schonborn, Planning Manager
City of El Segundo, Community Development Department
350 Main Street,
El Segundo, CA 90245
Email: eschonborn@elsegundo.org

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation may be required. If not or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND will be considered for adoption and the Project for approval.

1.4 Incorporation by Reference

Pursuant to State CEQA Guidelines §15150, an MND may incorporate by reference all, or portions of, another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the MND's text.

The references outlined below, which were utilized during preparation of this Initial Study, are available for review on the City's website, at:

- https://www.elsegundo.org/government/departments/development-services/planning-division/general-plan
- https://codelibrary.amlegal.com/codes/elsegundoca/latest/overview

El Segundo General Plan (City of El Segundo, 1992). The City adopted its comprehensive El Segundo General Plan ("General Plan") in 1992. Since adopting the General Plan, the Circulation Element was adopted in September 2004 and the 2021-2029 Housing Element (6th Cycle) was adopted in February 2022. The General Plan outlines the City's goals, plans, and objectives for land use within the City's jurisdiction. The General Plan was used throughout this IS/MND as a source of baseline data and City policy requirements.

City of El Segundo Final General Plan Environmental Impact Report (EIP Associates) (SCH No. 1991041092). The City of El Segundo Final General Plan Environmental Impact Report ("General Plan EIR") was certified December 1, 1992 by Ordinance No. 1189. The General Plan EIR analyzed the potential environmental impacts that would result from General Plan implementation. The General Plan EIR was used throughout this IS/MND as a source of baseline data and mitigation requirements.

El Segundo Municipal Code. The El Segundo Municipal Code (ESMC) regulates municipal affairs within the City's jurisdiction including, without limitation, the building and zoning regulations (i.e., ESMC Title 13, *Building Regulations* and Title 15, *Zoning Regulations*). ESMC Titles 13 and 15 are the primary tools for implementing the General Plan and coordinating and controlling the

development and use of real property throughout the City. The ESMC is referenced throughout this IS/MND to establish the Project's baseline regulatory requirements.

T5 Data Center Expansion Project EA 971 444 N. Nash Street Initial Study/Mitigated Negative Declaration *(2012 IS/MND) (RBF Consulting, December 3, 2012).* The 2012 IS/MND evaluated a 63,666-SF expansion to an existing 116,756-SF data center. The project evaluated in the IS/MND included construction of a two-story building addition along the property's northern portion, and partial demolition of a building and construction of a two-story building addition along the property's western portion. The data center's floor area would total 180,422 SF at completion, representing a net increase in floor area of 63,666 SF. The IS/MND also evaluated up to four new generators, resulting in up to eight total generators. The 2012 IS/MND concluded the proposed project would result in no impact or less than significant impact for all resource areas studied, except the following, which were concluded to be less than significant with mitigation incorporated:

- Air Quality
- Noise and Vibration
- Tribal Cultural Resources

1.5 Report Organization

This document is organized into the following sections:

Section 1.0: Introduction provides a Project introduction and overview, cites the State CEQA Guidelines to which the proposed Project is subject, and summarizes the IS' conclusions.

Section 2.0: Project Description details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This Section also identifies the IS' intended uses, including a list of anticipated permits and other approvals.

Section 3.0: Environmental Checklist Form provides the Project background and an overview of potential impacts that may or may not result from Project implementation.

Section 4.0: Evaluation of Environmental Impacts provides an analysis of environmental impacts identified in the environmental checklist.

Section 5.0: References identifies resources used to prepare the IS.

Section 6.0: Inventory of Mitigation Measures provides an inventory of mitigation measures.

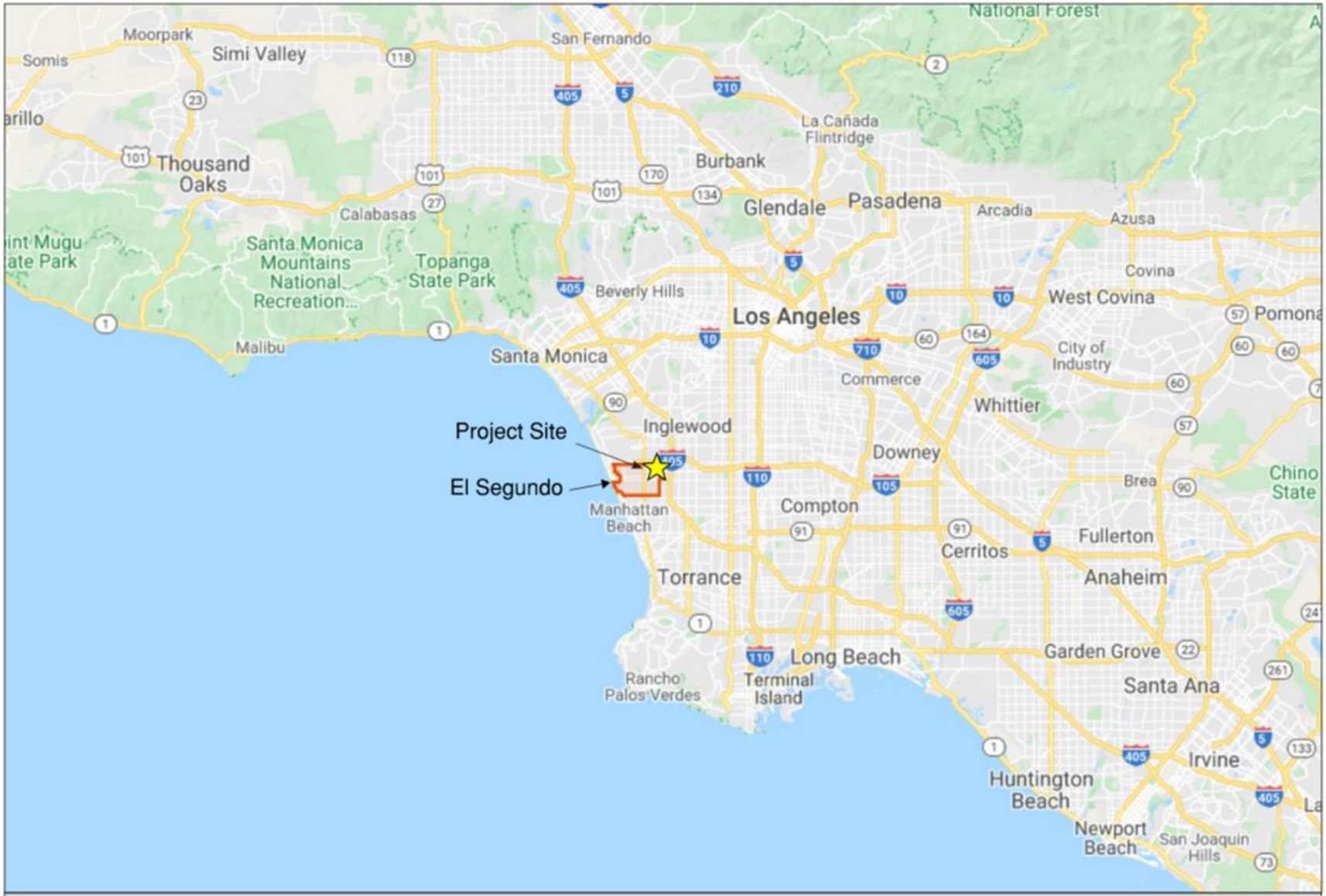

EXHIBIT 1: Regional Vicinity Map
Nash Street Data Center Generator Project

NOT TO SCALE

Kimley»Horn

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2.0 PROJECT DESCRIPTION

2.1 Location

The Project site is located in the northeast quadrant of the City of El Segundo (City or El Segundo), in the County of Los Angeles (County), approximately 18-miles southwest of downtown Los Angeles. It is approximately 0.5 mile south of Los Angeles International Airport (LAX); see **Exhibit 2-1: Regional Vicinity Map**. Regional access to the site is provided via the San Diego Freeway (Interstate 405) located approximately 1.0 mile to the east, Interstate 105 approximately one mile to the north, and El Segundo Boulevard approximately 0.3 mile to the south. Additionally, Sepulveda Boulevard (Highway 1) is approximately 0.5 mile west of the Project site.

The Project site is comprised of a 0.5-acre portion of an approximately 6.14-acre property (Assessor's Parcel Number 4138-003-007[2]), located at 444 North Nash Street; see **Exhibit 2-2: Local Vicinity Map**.

2.2 Environmental Setting

2.2.1 ON-SITE CONDITIONS

The Project site is relatively level, with elevations ranging from 98 to 105 feet above sea level (amsl). As depicted on **Exhibit 2-3: Aerial Map**, the Project site is occupied by equipment concrete pads/footings, gravel and base, and stairs.

As also depicted on **Exhibit 2-3**, the overall data center property is fully developed and occupied by an approximately 116,756-SF data center with 70 surface parking spaces. Three emergency backup diesel generators and a Southern California Edison substation are situated at the property's southeast corner. One additional emergency backup diesel generator is on the roof of the building.

Site access to the data center is provided via two driveways off of North Nash Street. Vehicle access is restricted by a gate on the north driveway, while the south driveway is not gated. Pedestrian access is provided by sidewalks off of North Nash Street.

As discussed below in **Section 2.2: Background and History**, in 2012, the data center building was proposed to be expanded from 116,756-SF to 180,422-SF. This expansion was approved in 2013. The proposed improvements were constructed (i.e., installation of additional generators, and pad preparation for future generators), except an approximately 38,861-SF two-story building expansion on the north side of the data center (the "northerly building expansion") and replacement of the one-story annex with a two-story building on the west side of the data center. As of this writing, four additional generators are currently being installed (resulting in eight in total). Construction of the northerly building expansion (not a part of this Project) is anticipated to occur in late 2022.

[2] County of Los Angeles, Office of the Assessor, *Property Assessment Information System.* https://maps.assessor.lacounty.gov/m/, Accessed December 13, 2021.

State CEQA Guidelines §15125(a)(1) specifies that where existing conditions change over time, and where necessary to provide the most accurate picture practically possible of a project's impacts, a lead agency may define existing conditions by referencing conditions expected when the project becomes operational. Additionally, CEQA specifies that a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record. Therefore, given the northerly building expansion and additional generators are expected to be in place when the proposed Project becomes operational, the environmental analyses contained herein consider two baselines (existing conditions and projected future conditions), where appropriate, as follows:

1) Existing Conditions: This baseline is the physical environmental conditions as they exist at the time this environmental analysis commenced in January 2022. Under this condition, the northerly building expansion and four additional generators are not assumed to be constructed.

2) Projected Future Conditions: This baseline is the projected future conditions that are expected to be in place when the proposed Project becomes operational. Under this condition, the northerly building expansion and four additional generators are assumed to be constructed and operational, as analyzed in the 2012 IS/MND.

Exhibit 2-1: Regional Vicinity Map

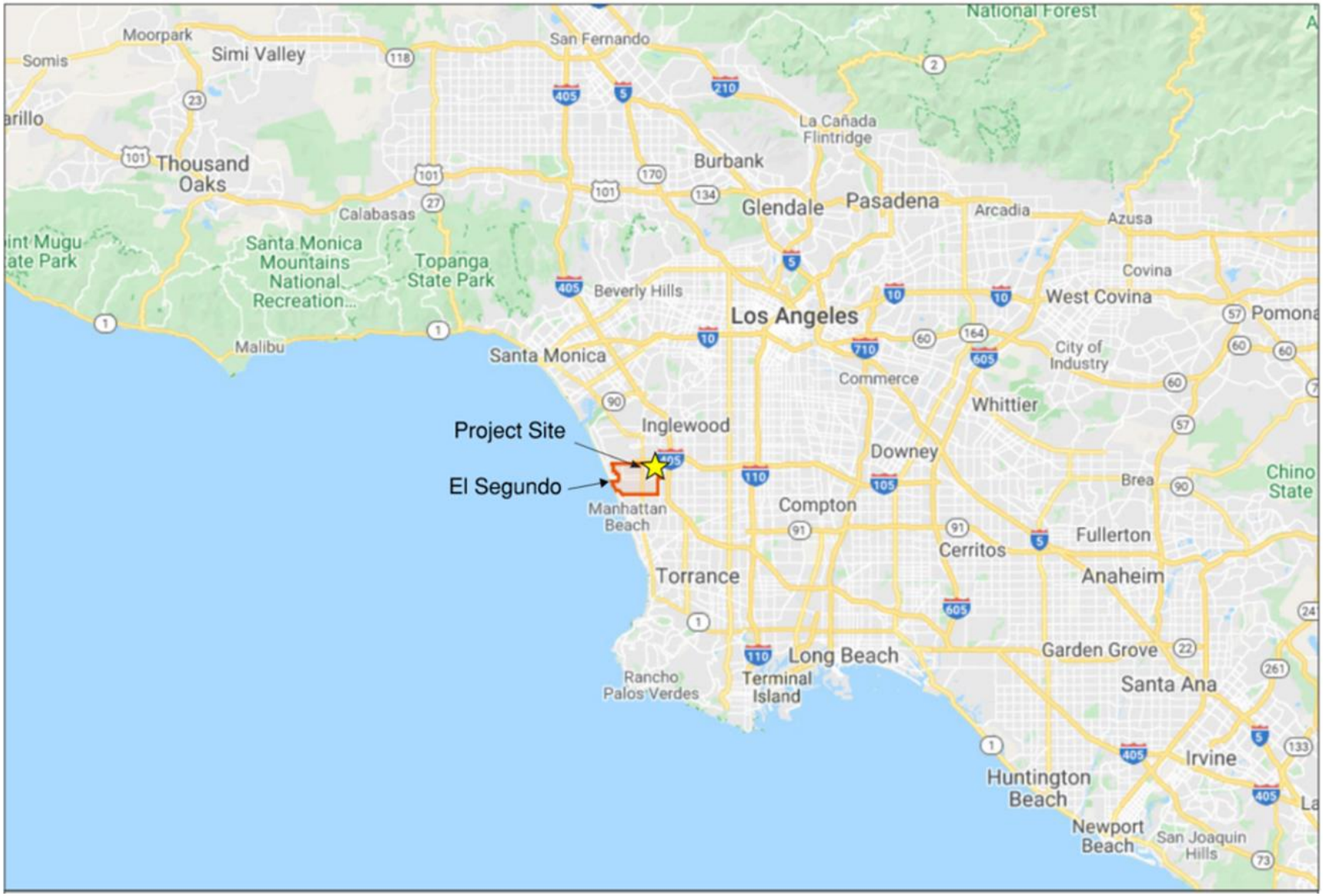

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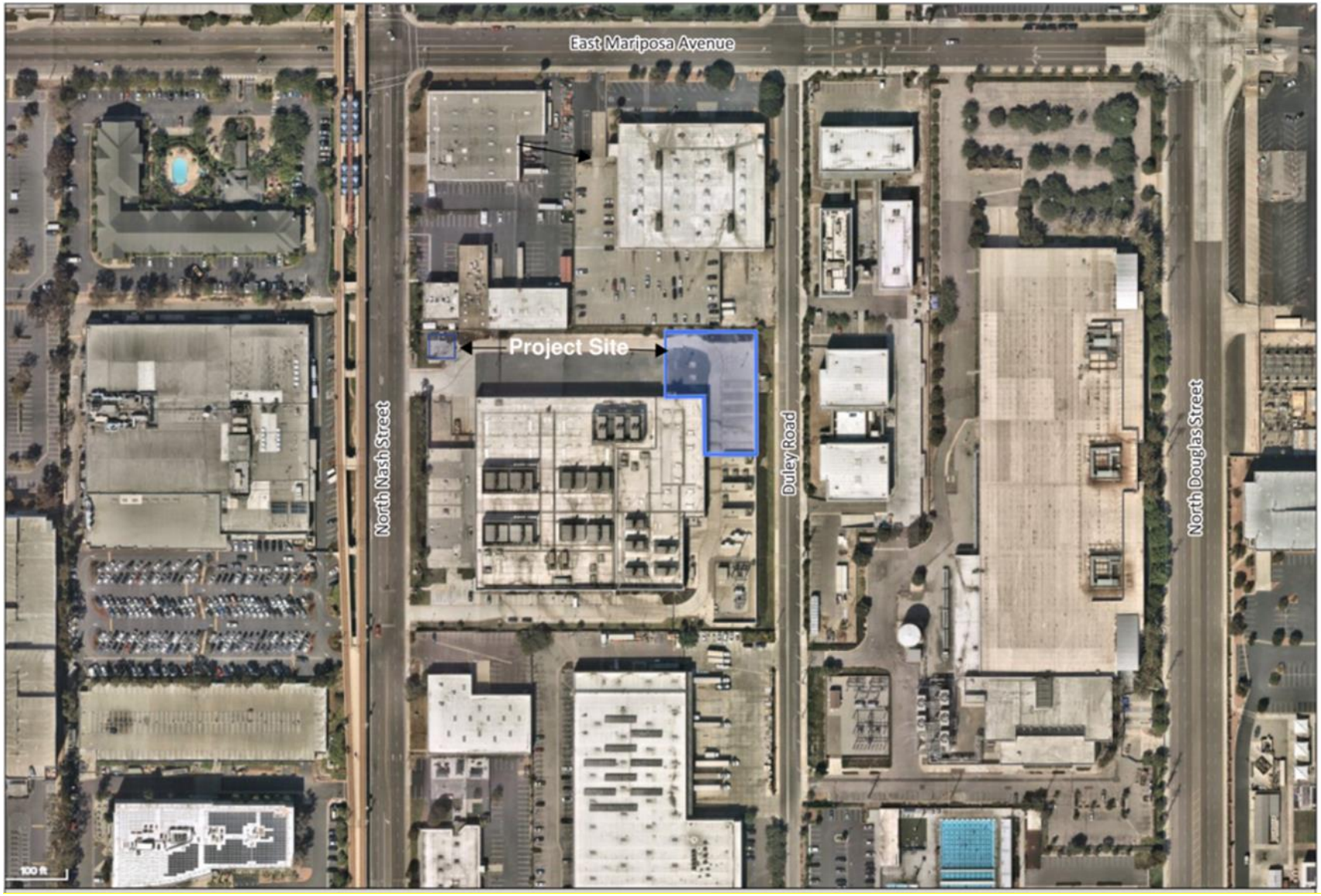
Exhibit 2-2: Local Vicinity Map



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2.2.2 GENERAL PLAN AND ZONING

The Project site's General Plan land use designation is Urban Mixed Use North,[3] which is intended to permit a mixture of office, research and development, retail, and hotel uses. Under this designation, light industrial uses conducted within a fully enclosed building must be permitted if approved with a discretionary application. The maximum floor area ratio (FAR) is 1.3.

The Project site is zoned Urban Mixed Use North (MU-N).[4] The MU-N Zone is intended to provide area(s) where a mixture of compatible commercial, office, research and development, retail, and hotel uses can locate and develop in a mutually beneficial manner.

2.2.3 SURROUNDING LAND USES

Onsite and surrounding land uses and zoning are summarized in **Table 2-1: Onsite and Surrounding Land Uses** and depicted on **Exhibit 2-2**.

Table 2-1: Onsite and Surrounding Land Uses

Description	Existing On-the-Ground	Zoning[1]
Project Site	Equipment concrete pads/footings, gravel and base, stairs, landscaping, and emergency backup generators	Urban Mixed Use North (MU-N)
North	Industrial/manufacturing, United States Post Office, Los Angeles International Airport	
South	On data center property, the existing data center and associated equipment and generators. Further south, beyond the data center, industrial and commercial uses	
East	Commercial uses and associated parking	
West	Light rail line, LA Kings Hockey Club, commercial uses	

Note:
Source: Google Earth Pro, 2022.

2.3 Background and History

A portion of the existing building was originally constructed as a warehouse and office building in the 1950's. Modifications to the property later occurred in 2008 and 2011. In 2012, the data center building was proposed to be expanded from 116,756-SF to 180,422-SF. Additions to the data center were to include a new 38,861-SF two-story building on the north side of the existing building (northerly building expansion), replacement of the one-story annex with a two-story building on the west side of the data center, and an additional vehicle access point.[5] On-site parking would remain unchanged. These improvements were addressed in the 2012 IS/MND discussed above in **Section 1.4: Incorporation by Reference**. The 2012 proposed improvements were constructed, except the approximately 38,861-SF northerly building expansion, which is

[3] City of El Segundo. (1992). *Land Use Map*. https://www.elsegundo.org/home/showpublisheddocument/362/637110574435030000. Accessed December 13, 2021.
[4] City of El Segundo. (2021). *City of El Segundo Planning & Building Safety Web Map*. https://elsegundo.maps.arcgis.com/apps/webappviewer/index.html?id=f9f2069afe54421f883b291148a10eb9. Accessed December 13, 2021.
[5] City of El Segundo. (2013). Resolution No. 2728: *A resolution approving a 63,666 square-foot expansion to an existing 116,756 square-foot data center building located at 444 North Nash Street*.

anticipated to occur in late 2022, and replacement of the one-story annex with a two-story building on the west side of the data center.

Table 2-2: Summary of Existing and Permitted Generators, details the quantity and size of generators installed prior to 2022, and those units which, as of this writing, were under construction and are expected to be operational prior to the start of Project construction. The eight generators listed on **Table 2-2** are, for the purposes of this analysis, considered the future baseline condition applicable to the proposed Project.

Table 2-2: Summary of Existing and Permitted Generators

Generator Size	Number of Units		
	Existing	CEQA Cleared/Permitted	Total
2,500 kW each	3	4	7
550 kW each	1		1
Total	*4*	*4*	*8*

On March 30, 2022, the City received an application from the Project Applicant to amend Environmental Assessment No EA 971 to allow up to 15 generators.

2.4 Project Characteristics

2.4.1 Project Overview

The Applicant proposes to install up to seven additional emergency backup diesel generators on the Project site, resulting in a total of 15 backup diesel generators. These seven additional generators would support previously constructed interior electrical/equipment modifications, which would result in increased electrical demand and up to five additional employees. Of the seven additional backup generators, four would be installed on platforms on top of existing generators. The platform generators would be shielded from view from the west by a proposed screen wall on the Project site's western side, and partially shielded from view from the east by the existing perimeter block wall on the property's eastern side. The remaining three at-grade generators would be built on concrete foundations. Supporting electrical equipment would be enclosed within electrical room containers (ERCs) located on separate foundations adjacent to the generators; see **Exhibit 2-3** for generator and ERC locations. No change in land use or increased building floor area is proposed as part of this Project. Additionally, no change in site access, landscaping, or parking is proposed. No new utility or service system (i.e., water, sewer, electrical, natural gas, communication) connections are proposed.

Existing drainage patterns would be maintained by matching the existing grades. Drainage would be accomplished through installing a drywell on the Project site's northwestern corner to satisfy City Low Impact Development (LID) requirements.

2.4.2 Site Plan

Generators are proposed on the building's northeastern side, as depicted on **Exhibit 2-3: Conceptual Site Plan**. **Table 2-3: Summary of Existing and Proposed Generators**, inventories the number and size of existing and proposed future generators upon Project implementation. It is

noted that three proposed generators would be stacked on top of another proposed generator, as denoted on **Exhibit 2-3**.

Table 2-3: Summary of Existing and Proposed Generators

Generator Size	Number of Generator Units		
	Existing[1]	Project Proposed	Total
2,500 kW each	7	5	12
550 kW each	1		1
1,250 kW		*2*	*2*
Total	***8***	***7***	***15***

Note:
1. As explained in **Section 2.3** above, at the time the Project analysis began, on or about February 2022, active construction to install generators 5 through 8 was underway, and expected to be completed by June 2022. Therefore, the appropriate baseline for the proposed Project is the projected future condition with eight onsite generators.

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Exhibit 2-3: Conceptual Site Plan

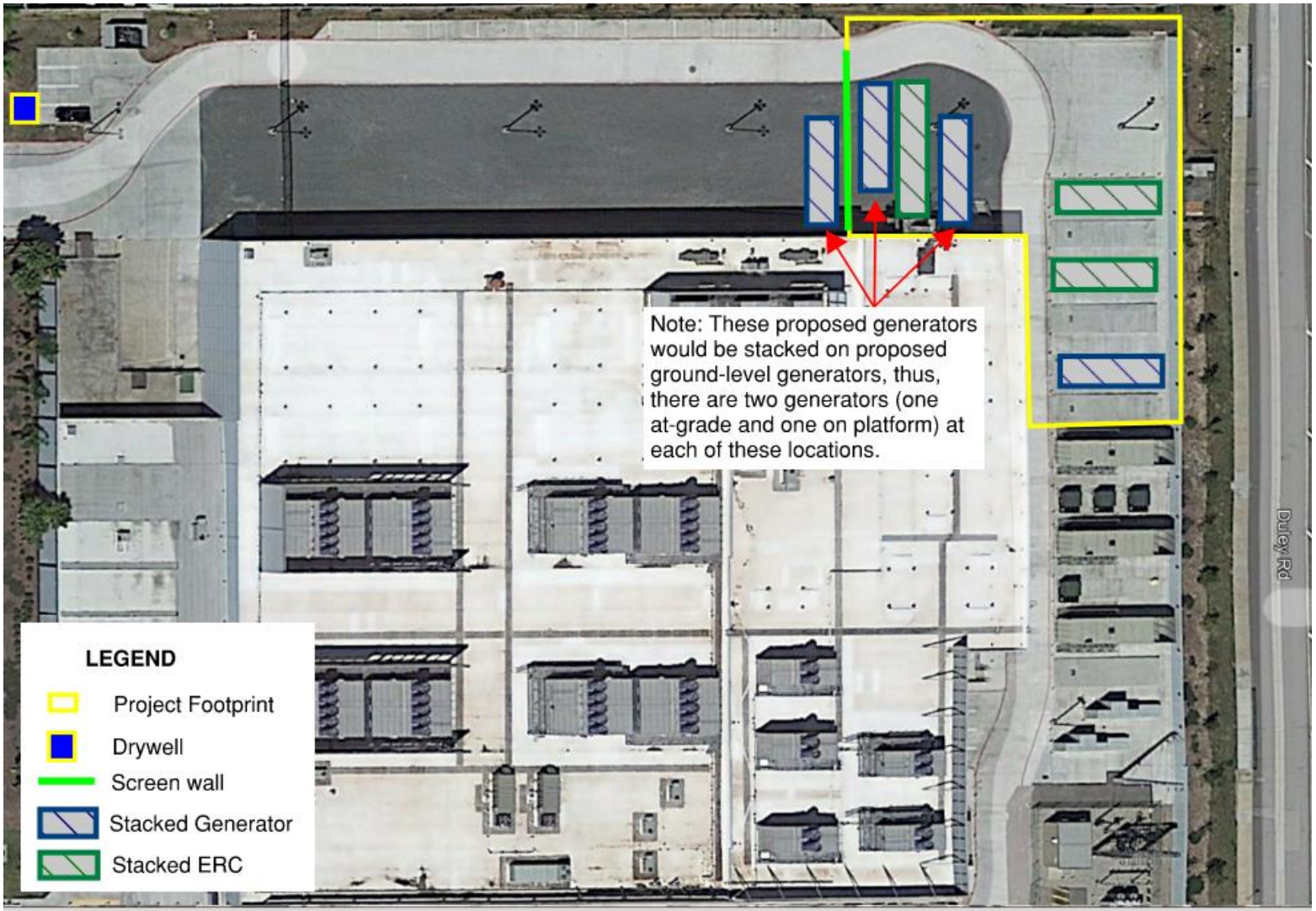

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Exhibit 2-4: Existing Building Elevation (from Duley Road, Looking Northwest)

Exhibit 2-5: Proposed Building Elevation (from Duley Road, Looking Northwest)

Exhibit 2-6: Existing Building Elevation (from North Nash Street, Looking East)

Exhibit 2-7: Proposed Building Elevation (from North Nash Street, Looking East)

Note that, because the drywell would be subsurface and have no vertical components, it is not visible in **Exhibit 2-7**. Additionally, the screen wall will be designed to architecturally match the existing data center, thus, is not readily distinguished in **Exhibit 2-7**. The screen wall is shown left (north) of the building.

2.4.3 Generators and Equipment

All backup generators would include housing for mechanical equipment to attenuate noise and protect the equipment from outdoor conditions. The Project's elevations are depicted in **Exhibit 2-5: Building Elevation (from Duley Road, Looking Northwest),** and **Exhibit 2-7: Building Elevation (from North Nash Street, Looking East)**.

The three ground level generators would be placed on concrete pads resulting in a total height of approximately 12 feet. The four platform generators would be placed on platforms resulting in a total height of approximately 30 feet.

An approximately 35-foot high equipment screen wall is proposed along the western Project site boundary to shield views of the platform generators from Nash Street to the west.

2.4.4 Utilities and Infrastructure

The City of El Segundo's Water Division and the City's Sewer Division are responsible for water and sewer services to the Project site. The Project does not propose new water or sewer utility connections.

Existing drainage patterns would be maintained by matching existing grades. Drainage would be accomplished through installing an approximately 30-foot deep drywell at the property's northwestern corner to satisfy City LID requirements. The drywell would collect stormwater runoff from on-site and, after treating within the drywell, percolate the water into the groundwater basin.

No new utility or service system (i.e., water, sewer, electrical, natural gas, communication) connections are proposed.

2.5 Project Construction Activities and Phasing

Project construction is anticipated to occur over one phase, lasting approximately two months, beginning mid-2022 and ending in late 2022. Construction would occur consistent with City noise policies, as presented in ESMC Title 2: Noise and Vibration. Specifically, construction would occur Monday through Saturday from 7:00 AM to 6:00 PM, consistent with the City noise policies specified in ESMC §7-2-10(D): Construction Noise. Project construction is anticipated to occur in the following sequence:

- Demolition (concrete removal),
- Site preparation, and
- Construction.

Site preparation for the Project would require cutting and removal of approximately 7,860 square feet of concrete and approximately 125 cubic yards of soil export. Final grading plans would be approved by the City, as applicable.

2.6 Project Operations

Upon installation of the additional generators, the Applicant expects future tenants to require on-site staff to occupy the existing office building space. It is anticipated that up to five employees over the baseline number of employees could result from Project implementation. Generators would only operate during emergency situations, commonly defined as "…whenever the primary energy supply is disrupted or discontinued during power outages or natural disasters that are beyond the control of the owner or operator of a facility" and for certain non-emergency situations, including"[6]…training of personnel under simulated emergency conditions, as part of emergency demand response procedures, or for standard performance testing procedures as required by law or by the generator manufacturer…"[7] The training and standard performance testing would occur weekdays, between 7 AM and 10 PM, and would total up to 50 hours per year per unit.

2.7 Agreements, Permits, and Approvals

The City, as Lead Agency, has discretionary authority over the proposed Project. Other agencies in addition to the City are expected to use this IS/MND in their decision-making process. To implement this Project, at a minimum, the following discretionary permits/approvals must be granted by the City and others:

- Environmental Assessment No. EA-971, Revision A, amending the total number of allowable generators from 14 to 15, and
- SCAQMD Authority to Construct/Permit to Operate.

[6] United States Environmental Protection Agency, https://www3.epa.gov/carbon-footprint-calculator/tool/definitions/emergency-generator.html; Accessed June 30, 2022.
[7] Ibid.

2.8 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a "Potentially Significant Impact" or “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

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

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3.0 LEAD AGENCY DETERMINATION

On the basis of 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 in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	X
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 or a potentially significant unless mitigated 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. An 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 potentially 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.	

CITY OF EL SEGUNDO

Eduardo Schönborn

Eduardo Schonborn, AICP
Planning Manager

October 28, 2022
Date

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4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after State CEQA Guidelines Appendix G**.** An explanation is provided for all responses except "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: on- and off-site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below-established thresholds that are considered to be significant.
- **Less Than Significant With Mitigation Incorporated.** The Project would have the potential to generate impacts, which may be considered as a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics could reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts, which may be considered significant, and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to more fully analyze the Project's impacts and identify mitigation.

4.1 Aesthetics

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code §21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?				X
c) If in a non-urbanized area, 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 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

Impact Analysis

4.1a Would the project have a substantial adverse effect on a scenic vista?

No Impact. Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly-valued landscape for the public's benefit. The City's General Plan does not identify any officially designated scenic vistas within the City boundaries. Although the City's western boundary includes 0.8-mile of Pacific Ocean shoreline, the Project site is approximately 2.65-miles east of the City's western boundary. Additionally, the intervening commercial and other uses block any view of the Pacific Ocean from the Project site and surrounding properties. Therefore, the Project would have no adverse effect on a scenic vista. No impact would occur in this regard and no mitigation is required.

4.1b Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?

No Impact. There are no State- or County-designated scenic highways in the City.[8] Further, there are no trees, rock outcroppings, or historic buildings on or adjacent to the Project site. Therefore, the Project would not damage scenic resources within a State scenic highway. No impact would occur in this regard and no mitigation is required.

[8] California Department of Transportation. (2018). *California Scenic Highway.* Retrieved from https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed on December 14, 2021.

4.1c If in a non-urbanized area, would the project 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 publicly accessible vantage point). If in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. Onsite and surrounding land uses and zoning are summarized in **Table 2-1: Onsite and Surrounding Land Uses** and depicted on **Exhibit 2-2**. The Project site is in an urbanized area and is fully developed. All surrounding land is fully developed and zoned Urban Mixed Use North (MU-N). The ESMC regulations pertaining to the MU-N zone are found in ESMC §15-5E-7 through §15-5E-10.

The Project proposes to install up to seven emergency generators at the property's northeast corner–three at ground level and four on platforms. The three ground level generators would be placed on concrete pads resulting in a total height of approximately 12 feet. The four platform generators would be placed on platforms resulting in a total height of approximately 30 feet. An approximately 30-foot-high equipment screen wall is proposed along the western Project site boundary to shield views of the platform generators from Nash street to the west. As shown on **Exhibit 2-4**, the proposed generators would be partially shielded by existing containers, landscaping, and the perimeter wall along Duley Street. The proposed generators would be shielded by a proposed screen wall on the Project site's western portion. Upon completion of the northerly building expansion, generators would be further shielded from views on Nash Street by the expansion's building façade, which would be in front of the screening wall shown on **Exhibit 2-7**. Also, a drywell is proposed at the Project site's northwestern corner. Because the drywell would not have above ground elements, the drywell would not be visible; see **Exhibit 2-7**.

Through the Site Plan review process, the City would verify the proposed Project's consistency with the zoning regulations that govern visual and scenic quality, which are found in ESMC §15-5E-7, *Site Development Standards*. The proposed generators would be a continuation of the existing data center, and visually compatible with the surrounding MU-N zone land uses. Concerning building height, the MU-N zone allows building heights up to 175 feet; see ESMC §15-5E-7, *Site Development Standards*. The Project's proposed screen wall and platform generators would be a maximum of 35 feet tall, in compliance with the MU-N zone's allowable building height. Therefore, following compliance with City standards, the proposed Project would result in a less than significant impact concerning regulations governing scenic quality and no mitigation is required.

4.1d Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. Existing outdoor lighting at and near the Project site is associated with industrial and street lighting along North Nash Street and Duley Road typical of urbanized areas. The Project does not propose to install any new lighting. Therefore, the Project would not create a new source of light or glare. No impact would occur in this regard and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.2 Agricultural and Forestry Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Impact Analysis

4.2a Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

4.2b Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

4.2c Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?

4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

4.2e 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?

No Impact. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in the City.[9] Further, according to the Williamson Act Status Report (2018-2019) Los Angeles County is a Non-Participating County.[10] Therefore, the Project would not conflict with any existing Williamson Act contract. Additionally, the Project site is zoned Urban Mixed Use North (MU-N). No agricultural, forest land, or timberland zoning exists in the City. [11] Therefore, no impact concerning mapped farmlands, Williamson Act contracts, or agricultural, forest, or timber land zoning would occur, and no mitigation is required.

[9] California Department of Conservation. (2016). *California Important Farmland Finder.* Retrieved from https://maps.conservation.ca.gov/dlrp/ciff/. Accessed on December 14, 2021.

[10] California Department of Conservation. (2020) *The Williamson Act Status Report 2018-2019*. Retrieved from https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2020%20WA%20Status%20Report.pdf. Accessed on December 14, 2021.

[11] City of El Segundo. (2021). *Zoning Map*. Retrieved from https://www.arcgis.com/apps/webappviewer/index.html?id=bf31cc23239f4504bf078ce36373fe2d. Accessed on December 14, 2021.

4.3 Air Quality

This Section is based on the *Air Quality Assessment* (Kimley-Horn, October 2022) and Health Risk Assessment (October 2022), which are included in their entirety as **Appendix A: Air Quality and Greenhouse Gas Technical Memorandum** and **Appendix D: Health Risk Assessment Technical Memorandum,** respectively.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		X		

South Coast Air Quality Management District (SCAQMD) Thresholds

Mass Emissions Thresholds

The SCAQMD CEQA Air Quality Handbook provides significance thresholds for volatile organic compounds (VOC) (also referred to as reactive organic gases [ROG]), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter 10 microns or less in diameter (PM10), and particulate matter 2.5 microns or less in diameter (PM2.5). The thresholds apply to both project construction and operation within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result. See **Table 4.3-1: South Coast Air Quality Management District Emissions Thresholds** for SCAQMD's construction and operational emissions thresholds**.**

Table 4.3-1: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors (Regional)	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Nitrogen Oxides (NO_X)	100	55
Volatile Organic Compounds (VOC)[1]	75	55
Particulate Matter 10 Microns and smaller in diameter (PM_{10})	150	150
Particulate Matter 2.5 Microns and smaller in diameter ($PM_{2.5}$)	55	55

Table 4.3-1: South Coast Air Quality Management District Emissions Thresholds		
Criteria Air Pollutants and Precursors (Regional)	**Mass Daily Thresholds (pounds per day)**	
	Construction	**Operations**
Sulfur Oxides (SO_X)	150	150
Carbon Monoxide (CO)	550	550
Notes: 1. VOCs and reactive organic gases (ROGs) are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.		
Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, April 2019.		

Localized Carbon Monoxide

In addition to the daily thresholds listed above, the proposed Project would be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 ppm
- 8-hour = 9 ppm

The significance of localized impacts depends on whether ambient CO levels near the Project site exceed State and federal CO standards. The South Coast Air Basin (SCAB) has been designated as attainment under the 1-hour and 8-hour standards.

Localized Significance Thresholds

In addition to the CO hotspot analysis, the SCAQMD developed Local Significance Thresholds ("LSTs") for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contribute to an exceedance of the most stringent federal ambient air quality standard (FAAQS) or State ambient air quality standards (CAAQS). LSTs are based on the ambient concentrations of that pollutant within the Project Source Receptor Area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. The Project's appropriate SRA for the localized significance thresholds is the Southwest Coastal Los Angeles (SRA 3) area since this area includes the Project site. LST analysis for construction is applicable for all projects that disturb 5.0 acres or less on a single day. **Table 4.3-2: Local Significance Thresholds (Construction/Operations)** provides the LSTs for a 1.0-acre, 2.0-acre, and 5.0-acre project site in SRA 3 with sensitive receptors located within 25 meters of a project site. The Project site totals approximately 0.50 acre, thus, the 1.0-acre threshold is used for Project analysis.

Table 4.3-2: Local Significance Thresholds (Construction/Operations)				
Project Size	**Nitrogen Oxide (NO_x) (lbs per day)**	**Carbon Monoxide (CO) (lbs per day)**	**Coarse Particulates (PM_{10}) (lbs per day)**	**Fine Particulates ($PM_{2.5}$) (lbs per day)**
1.0 Acre:				
Construction	91	674	5	3
Operations	91	674	1	1
2.0 Acres:				
Construction	131	982	8	5
Operations	131	982	2	1
5.0 Acres:				
Construction	197	1,823	15	8
Operations	197	1,823	4	2
Source: South Coast Air Quality Management District. (July 2008). *Localized Significance Threshold Methodology.*				

Health Risk Analysis Thresholds

Project health risks are determined by examining the types and levels of air toxics generated and the associated impacts on factors that affect air quality. While the final determination of significance thresholds is within the Lead Agency's purview pursuant to State CEQA Guidelines, the SCAQMD recommends that the air pollution thresholds presented below be used by lead agencies in determining whether a project's impacts are significant. If the lead agency finds that the project has the potential to exceed the air pollution thresholds, the project should be considered significant. A project's impacts would be considered significant with respect to toxic air contaminant emissions if the project would:

- **Cancer Risk:** Emit contaminants that exceed the maximum individual cancer risk of 10 in one million.
- **Cancer Burden**: Emit contaminants resulting in a cancer burden greater than 0.5 excess cancer cases (in areas with individual cancer risk greater than 1 in 1 million)
- **Non-Cancer Risk:** Emit contaminants that exceed the maximum hazard quotient of 1 in one million.

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incremental increase in lifetime cancer risk of 10 in one million due to DPM exposure. This threshold serves to determine whether or not a project has a potentially significant development-specific and cumulative impact. The 10 in one million standard is a health-protective significance threshold. This risk would be an excess cancer that is in addition to any cancer risk borne by a person not exposed to these air toxics. To put this risk in perspective, the risk of contracting cancer from all air toxics in the SCAB is 420 in a million which is 42 times more than the SCAQMD's threshold of 10 in one million.[12]

Because the proposed generators are subject to SCAQMD rules and regulations, additional thresholds of significance apply. Specifically, Rule 1401 *New Source Review of Toxic Air*

[12] South Coast Air Quality Management District, *MATES V Estimated Risk*, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A315&views=view_38%2Cview_1, Accessed February 2, 2022.

Contaminants establishes limits for maximum individual cancer risk (MICR), cancer burden,[13] and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units which emit applicable toxic air contaminants. DPM is a substance listed in Rule 1401 Table 1.[14] Therefore, the requirements to allow construction and use of the proposed generators are as follows:

1. **MICR and Cancer Burden:** The cumulative increase in MICR, which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated, or modified permit unit, will not result in any of the following:

   (A) An increased MICR greater than one in one million (1.0 x 10-6) at any receptor location, if the permit unit is constructed without T-BACT;

   (B) An increased MICR greater than ten in one million (10 x 10-6) at any receptor location, if the permit unit is constructed with T-BACT;

   (C) A cancer burden greater than 0.5.

2. **Chronic Hazard Index:** The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated, or modified permit unit owned or operated by the Applicant for which applications were deemed complete on or after the date when the risk value for the compound is finalized by the State Office of Environmental Health Hazard Assessment (OEHHA) will not exceed 1.0 at any receptor location.

3. **Acute Hazard Index:** The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated, or modified permit unit owned or operated by the Applicant for which applications were deemed complete on or after the date when the risk value for the compound is finalized by OEHHA will not exceed 1.0 at any receptor location.

SCAQMD Rule 1402 *Control of Toxic Air Contaminants From Existing Sources* reduces the health risk associated with TAC emissions from existing sources by specifying notification risk levels, action risk levels, and significant risk levels (see **Table 4.3-3: Facility-Wide Risk Levels**) for MICR, cancer burden, and non-cancer acute and chronic HI applicable to total facility emissions. The rule establishes requirements to implement Risk Reduction Plans to achieve specified risk limits, as required by the Hot Spots Act and Rule 1402.

Table 4.3-3: Facility-Wide Risk Levels

Indicator	Notification Risk	Action Risk Level	Significant Risk Level
MICR	10 in one million	25 in one million	100 in one million
Cancer burden	N/A	0.5	N/A
Acute HI	1.0	3.0	5.0
Chronic HI	1.0	3.0	5.0

[13] Cancer burden means the estimated increase in the occurrence of cancer cases in a population subject to a MICR of greater than or equal to one in one million (1.0 x 10-6) resulting from exposure to TACs.

[14] SCAQMD. (2017). *Rule 1401*. http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf?sfvrsn=4; page 1401-17; Accessed January 26, 2022.

The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index of less than 1.0 means that adverse health effects are not expected, thus, non-carcinogenic exposures of less than 1.0 are considered less than significant. See **Appendix A** for additional information on modeling.

Methodology

The Project's operations were analyzed for impacts concerning the additional seven generators; see **Appendix A** for model inputs, and see **Table 2-2** for the quantity and engine type of the proposed generators. Cumulative impacts included the existing eight generators plus the additional seven generators, as detailed below.

State CEQA Guidelines §15145, peculation, specifies that, "if, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." There is no basis or available data for what the underlying assumptions an emergency operations analysis/modeling might include. Emergency operations would entirely depend on the nature and duration of emergency (i.e., the number of generators would depend on the power disruption, and operational hours during this time would depend on the duration of the emergency). Therefore, because analysis of the Project's impacts under an emergency operations scenario would be too speculative, emergency operations were not analyzed.

SCAQMD policy and procedures No. EC-02-09 (dated February 24, 2009) establishes that the potential to emit (PTE) for stationary emergency generators be calculated based solely on the annual maintenance hours allowed (50 hours). This analysis is based on the generators operating for certain non-emergency situations, including training of personnel under simulated emergency conditions, as part of emergency demand response procedures, or for standard performance testing procedures as required by law or by the generator manufacturer. Therefore, this analysis assumes the training and standard performance testing would occur up to 50 hours per year per unit, per SCAQMD policy and procedures No. EC-02-09.

Impact Analysis

4.3a Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. As part of its enforcement responsibilities, the United States Environmental Protection Agency (USEPA) requires that each state with nonattainment areas prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the FAAQS and CAAQS. Air quality attainment plans

outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project site is within the SCAB, which is under SCAQMD's jurisdiction. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce criteria pollutant emissions for which SCAB is in non-attainment. To reduce such emissions, the SCAQMD drafted the 2016 Air Quality Management Plan (AQMP), which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, SCAG, and the Environmental Protection Agency (EPA). The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1**: A proposed project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of the AQMP's air quality standards or the interim emissions reductions.
- **Consistency Criterion No. 2**: A proposed project would not exceed the AQMP's assumptions or increments based on the years of the project build-out phase.

Consistency Criterion No. 1 refers to the NAAQS and CAAQS. As indicated in **Table 4.3-4: Construction-Related Emissions (Maximum Pounds Per Day)** and **Table 4.3-5: Operational Emissions (Maximum Pounds Per Day)** below, Project construction would be below SCAQMD's thresholds. Operational emissions would be below SCAQMD thresholds, except for NOx, which would be less than significant with mitigation incorporated; see MM AQ-1. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standard. Thus, the Project would be consistent with Criterion No. 1. A less than significant impact would occur, and no mitigation is required.

Consistency Criterion No. 2 refers to SCAG's growth forecasts and associated assumptions included in the AQMP. The AQMP's projected future air quality levels are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region. Therefore, projects that are consistent with the applicable assumptions used in AQMP development would be consistent with the AQMP's assumed VMT and population growth, thus, not jeopardize attainment of the AQMP's identified air quality levels, even if they exceed the SCAQMD's recommended daily emissions thresholds.

The Project site's General Plan land use designation is Urban Mixed Use North. The Project proposes to install up to seven generators at an existing data center. No change or expansion in land use is proposed. Additionally, the Project would not generate any population growth and

only very nominal VMT from the up to five additional employees. The Project would not conflict with or cause an exceedance of the Urban Mixed Use North designation's intended/assumed land uses for the Project site, which are the basis for the AQMP. Therefore, the Project would be consistent with the AQMP's population and VMT assumptions. It is also noted that the Project's construction air emissions would not exceed the SCAQMD regional thresholds, and operational air emissions would not exceed the SCAQMD regional thresholds with mitigation incorporated. Localized construction and operations emissions would not exceed SCAQMD LST thresholds; see Responses 4.3b and 4.3c below. As such, the Project would be consistent with Criterion No. 2. A less than significant impact would occur and no mitigation is required.

4.3b 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?

Less Than Significant Impact With Mitigation Incorporated.

Construction Emissions

Project construction activities would generate short-term criteria air pollutant emissions. The Project area's criteria air pollutants of primary concern are ozone-precursor pollutants (i.e., ROG and NO_x) and PM_{10} and $PM_{2.5}$. Construction-related emissions are short-term and temporary, lasting only while construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction activities temporarily generate emissions from site grading, motor vehicle exhaust associated with construction equipment and worker trips, and movement of construction equipment, especially on unpaved surfaces. Airborne particulate matter emissions are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the application of water.

For analysis purposes, Project construction is estimated to occur over approximately two months, beginning July 2022. The Project would install seven emergency generators- three at ground level on concrete pads and four on platforms. Project construction-generated emissions were calculated using the CARB-approved CalEEMod, which is designed to model emissions for land use development projects based on typical construction requirements. See **Appendix A** for more information regarding the Project's construction assumptions.

As discussed above, the air quality modeling assumes Project construction would begin in July 2022. However, the current Project construction schedule assumes Project construction would begin September 2022, or two months later than assumed in the air quality modeling. However, the air quality modeling concerning the construction schedule is considered conservative because CalEEMod emissions factors for future years decline given advancements in construction equipment technology and fleet turnover. **Table 4.3-4** provides the Project's estimated maximum daily construction-related emissions and indicates all criteria pollutant emission levels would be below their respective thresholds. In addition, the Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, which prohibit nuisances, require

dust control measures, and limit VOC content in paints, respectively. Compliance with these SCAQMD rules would further reduce construction-related emissions. All criteria pollutant emissions would be below the applicable thresholds; thus, impacts would be less than significant.

Table 4.3-4: Construction-Related Emissions (Maximum Pounds Per Day)

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NOx)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
2022	1.77	17.58	14.26	0.03	8.16	4.38
Maximum Emissions	**1.77**	**17.58**	**14.26**	**0.03**	**8.16**	**4.38**
SCAQMD Threshold	75	100	550	150	150	55
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0, as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.

Source: CalEEMod version 2020.4.0; see **Appendix A: Air Quality and Greenhouse Gas Technical Memorandum** for model outputs.

Operational Emissions

Operational emissions are associated with the emergency generators attributable to the Project. As shown in **Table 4.3-5**, the Project's operational emissions could exceed the SCAQMD threshold for NOx emissions. These operational emissions are mostly attributed to a day in which generator routine testing, staff training, and maintenance could occur simultaneously. The 50 hours per year includes scheduled and unscheduled maintenance. SCAQMD requires the facility to monitor and demonstrate compliance. The scheduled maintenance would be dictated in accordance with manufacturers recommendations, which are currently not available until possessions of units occurs. Additionally, a small amount of Project operational emissions would be attributed to vehicle trips from up to five additional employees. Mitigation Measure AQ-1 requires that generator maintenance and testing be limited on any single day to no more than 110 minutes for the entire facility (up to 15 generators). Therefore, with implementation of Mitigation Measure AQ-1, all criteria pollutants would remain below their respective thresholds and regional operational emissions would result in a less than significant long-term regional air quality impact.

Table 4.3-5: Operational Emissions (Maximum Pounds Per Day)

Source	Emissions (pounds per day)[1]					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Unmitigated Scenarios						
Generators	7.98	412.86	68.74	0.70	5.74	5.74
Project Trips	0.03	0.03	0.52	>0.01	0.19	0.05
Total	8.01	412.89	69.26	0.70	5.93	5.79
SCAQMD Threshold	55.00	55.00	550.00	150.00	150.00	55.00
SCAQMD Threshold Exceeded?	**No**	**Yes**	**No**	**No**	**No**	**No**
Mitigated Scenario[2]						
Generators	0.41	25.19	3.73	0.04	0.34	0.34
Project Trips	0.03	0.03	0.52	>0.01	0.19	0.05
Total	**0.44**	**25.22**	**4.25**	**0.04**	**0.53**	**0.39**
SCAQMD Threshold	*55.00*	*55.00*	*550.00*	*150.00*	*150.00*	*55.00*
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0, as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.
2. Mitigated emissions include compliance with Mitigation Measure AQ-1, which requires that generator maintenance and testing be limited on any single day to no more than 110 minutes for the entire facility (15 generators).
3. Potential to emit (PTE) of an engine is based on the 50 hour per year limit on maintenance and testing operations, in accordance with South Coast AQMD's policy and procedures No. EC-02-09, dated 2/24/2009.

Cumulative Short-Term Emissions

SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for CAAQS and nonattainment for O_3 and $PM_{2.5}$ for NAAQS. As discussed above, the Project's construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants.

Since these thresholds indicate whether individual Project emissions have the potential to affect cumulative regional air quality, it can be expected that the Project-related construction emissions would not be cumulatively considerable. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB, which would include related cumulative projects. As concluded above, the Project's construction-related air quality impacts would be less than significant. Compliance with SCAQMD rules and regulations would further minimize the Project's construction-related emissions. Therefore, Project-related construction emissions, combined with other projects in the area, would not substantially deteriorate the local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to a significant cumulative air quality impact.

Cumulative Long-Term Emissions

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As indicated in **Table 4.3-5**, the Project's operational emissions would not exceed SCAQMD thresholds and the PTE would remain below major source thresholds. Therefore, the Project's operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant.

4.3c Would the Project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Localized Construction Significance Analysis

The sensitive receptor nearest the Project site is an aquatic center located approximately 350 feet (107 meters) to the southeast. According to SCAQMD a recreational facility is a sensitive receptor. To identify impacts to sensitive receptors, the SCAQMD recommends addressing Localized Significance Thresholds (LSTs) for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific level proposed projects.

The Project's appropriate SRA for the localized significance thresholds is the Southwest Coastal Los Angeles (SRA 3) area since this area includes the Project site. LSTs apply to NO_X, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5.0 acres in size. The Project would include minor grading on the 0.5-acre site. However, the LST methodology and daily equipment modeled in CalEEMod do not provide thresholds for disturbance less than 1.0 acre. Therefore, Project construction is assumed to disturb

approximately 1.0 acre in a single day, and the LSTs for a maximum daily disturbance of 1.0 acre were used for this analysis.

The SCAQMD's methodology indicates that "off-site mobile emissions from a project should not be included in the emissions compared to LSTs." Therefore, for purposes of the Project's construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The sensitive receptors nearest the Project site are the swimming facility located approximately 350 feet (107 meters) to the southeast and the soccer field located approximately 475 feet (145 meters) to the north. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, as recommended by the SCAQMD, LSTs for receptors located at 100 meters were utilized in this analysis to conservatively analyze for the nearest sensitive receptor located 107 meters from the Project site.

Table 4.3-6: Significance of Localized Emissions, presents the results of localized construction emissions. **Table 4.3-6** shows that peak day pollutant emissions during construction would not exceed SCAQMD LSTs, thus, would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact concerning LSTs during construction activities.

Table 4.3-6: Significance of Localized Emissions

Source/Activity	Emissions (pounds per day)[1]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction Emissions				
Demolition 2022	16.81	13.19	1.76	0.93
Grading 2022	11.78	6.55	8.73	4.55
Building Construction 2022	14.15	13.90	0.72	0.68
Paving 2022	7.85	9.24	0.39	0.36
SCAQMD Localized Screening Threshold (1 acre of disturbance at 100 meters)	107	1,156	28	9
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Operational Emissions				
On-Site Emissions (Area + Energy Sources)[1]	25.31	4.37	0.54	0.95
SCAQMD Localized Screening Threshold (1 acre of disturbance at 50 meters)	107	1,156	7	3
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. Source: CalEEMod version 2020.4.0. Refer to **Appendix A: Air Quality and Greenhouse Gas Technical Memorandum** for model data outputs.
2. This includes Mitigation Measure AQ-1 which limits maintenance and testing of the emergency generators.

According to the SCAQMD LST methodology, LSTs apply to on-site sources. LSTs for receptors located at 100 meters for SRA 3 were conservatively utilized in this analysis. The 1-acre LST threshold is used for the 0.5-acre Project site. The operational emissions shown in **Table 4.3-6** include all on-site Project-related stationary sources (i.e., area and energy sources). **Table 4.3-6** shows that the Project's maximum daily emissions of these pollutants during operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact concerning LSTs during operational activities.

Construction-Related Diesel Particulate Matter

Project construction would generate DPM emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to toxic air contaminants (TAC) emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment would dissipate rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. The receptor nearest the Project site is the United States Postal Service located approximately 50 feet to the north, and even further from the major Project construction areas. However, the sensitive receptor nearest the Project site is the swimming facility located 350 feet to the southeast.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from diesel particulate matter (DPM). Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction activities would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by Project construction activities, in and of itself, would not expose sensitive receptors to substantial amounts of air toxins and the Project would result in a less than significant impact. No mitigation is required.

Operational Health Risk Analysis

The Project would increase the number of on-site emergency generators from 8 (existing) to 15 (permitted), which would potentially expose nearby sensitive receptors to increased air toxics and resultant health risks. Emergency generator emission rates were calculated using generator specifications.

Based on the AERMOD outputs, expected annual average diesel $PM_{2.5}$ emission concentrations from the Project's emergency generators to the sensitive receptors would be 0.003 µg/m^3 in the opening year. As shown in **Table 4.3-7: Operational Risk Assessment Results**, the Project's highest calculated carcinogenic risk is 4 per million, which is below the lowest threshold of 10 per million. The calculated acute and chronic hazards are also below the Rule 1401 threshold of 1.0 and Rule 1402 threshold of 3.0.

Table 4.3-7: Operational Risk Assessment Results

Emission and Exposure Scenario	Pollutant Concentration ($\mu g/m^3$)	Maximum Cancer Risk (Risk per Million)	Chronic Noncancer Hazard	Acute Noncancer Hazard
Individual Emergency Generator, at nearest offsite worker location	0.0001	0.01	0.00002	0.004
Individual Emergency Generator, at nearest residence	0.0003	0.25	0.0001	0.004
Total Facility (15 Emergency Generators), at nearest offsite (worker location)	0.002	0.10	0.0004	0.058
Total Facility (15 Emergency Generators), at nearest residence	0.005	4.03	0.0009	0.058
Exceed CEQA Threshold?[3]	**No**	**No**	**No**	**No**
Exceed 1401 Threshold?[4]	**No**	**No**	**No**	**No**
Exceed 1402 Threshold?[5]	**No**	**No**	**No**	**No**

1. Refer to **Appendix D: Health Risk Assessment Technical Memorandum**.
2. The maximum cancer for would be experienced at the soccer field northwest of the Project site based on worst-case exposure durations for the Project, 95th percentile breathing rates, and 25-year averaging time for workers. The residents are located east of the Project site.
3. CEQA threshold is expose sensitive receptors to substantial pollutant concentrations (10 in one million cancer risk and 1.0 acute and chronic noncancer risk).
4. SCAQMD 1401 Threshold is 10 in one million cancer risk and 1.0 acute and chronic noncancer risk.
5. SCAQMD 1402 Threshold is 25 in one million cancer risk and 3.0 acute and chronic noncancer risk.

The pollutant concentrations modeled in AERMOD represent the exposure levels outdoors. The analysis conservatively does not include indoor exposure adjustments for residents. However, the typical person spends most of their time indoors rather than remaining outdoors in the same location for 24 hours a day. Therefore, the AERMOD outdoor pollutant concentrations are not necessarily representative of actual exposure at the Project site and tend to overestimate exposure. The risk calculations are based on the pollutant concentration at the worst-case location (approximately 2,200 feet to the east) and conservatively assume no cleaner technology or lower emissions in future years, and 95th percentile breathing rates.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (Sierra Club v. County of Fresno [Friant Ranch, L.P.] [2018] 6 Cal.5th 502). The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the SCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based FAAQS. The FAAQS establish the necessary air quality levels, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts would occur.

NO_X and ROG are precursor emissions that form ozone in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources. Breathing ground-level ozone can result in health effects that include reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily ozone concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that ozone can make asthma symptoms worse and can increase sensitivity to asthma triggers.

According to the SCAQMD's 2016 AQMP, SCAB's ozone, NO_X, and ROG have been decreasing since 1975 and are projected to continue to decrease in the future. Although the SCAB's VMT continue to increase, NO_X and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. The 2016 AQMP demonstrates how the SCAQMD's control strategy to meet the 8-hour ozone standard in 2023 would lead to sufficient NO_X emission reductions to attain the 1-hour ozone standard by 2022. In addition, since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the ozone standards will likewise lead to improved $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.

The SCAQMD's air quality modeling demonstrates that NO_X reductions prove to be much more effective in reducing ozone levels and will also lead to a significant decrease in $PM_{2.5}$ concentrations. NO_X-emitting stationary sources regulated by the SCAQMD include Regional Clean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, etc.), natural gas combustion equipment (e.g., boilers, heaters, engines, burners, flares) and other combustion sources that burn wood or propane. The 2016 AQMP identifies robust NO_X reductions from new regulations on RECLAIM facilities, non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NO_X emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives, such as residential and commercial furnaces, pool heaters, and backup power equipment. The AQMD plans to achieve such replacements through a combination of regulations and incentives. Technology-forcing regulations can drive development and commercialization of clean technologies, with future year requirements for new or existing equipment. Incentives can then accelerate deployment and enhance public acceptability of new technologies.

The 2016 AQMD also emphasized that beginning in 2012, continued implementation of previously adopted regulations will lead to NO_X emission reductions of 68 percent by 2023 and 80 percent by 2031. With the addition of 2016 AQMP proposed regulatory measures, a 30 percent reduction of NO_X from stationary sources is expected in the 15-year period between

2008 and 2023. This is in addition to significant NO_X reductions from stationary sources achieved in the decades prior to 2008.

As previously discussed, the Project's construction-related and operational emissions would not exceed SCAQMD thresholds, thus, would be less than significant with mitigation incorporated; see **Table 4.3-4** and **Table 4.3-5**, respectively. The onsite Project emissions' localized effects on nearby receptors were also found to be less than significant; see **Table 4.3-6** and **Table 4.3-7**. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels more than the health-based ambient air quality standards.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in an intersection's level of service (LOS) from a proposed project could result in exceedances of the NAAQS or CAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, California's CO standard is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An SCAQMD analysis prepared for CO attainment in the SCAB can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP. The SCAB was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP.

The 2003 AQMP is the most recent AQMP that addresses CO concentrations. As part of the SCAQMD CO Hotspot analysis, the Century Boulevard at La Cienega Boulevard intersection, one of the most congested intersections in Southern California, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 3.7 parts per million (ppm), which is well below the 35 ppm federal standard. Further, as part of the SCAQMD CO Hotspot analysis, the Wilshire Boulevard at Veteran Avenue intersection, which accommodates 100,000 daily vehicles, was analyzed and no CO hotspots were identified. Nash Street adjacent to the Project

site has an existing 9,300 average daily trips.[15] As concluded in Response 4.17b, the Project is forecast to generate approximately 18 average daily trips; thus, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections as the Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. Therefore, impacts would be less than significant in this regard.

4.3d Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant

Construction

The Project would result in emissions other than those leading to odors; see Responses 4.3b and 4.3c above.

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

During construction, emissions from construction equipment, such as diesel exhaust and VOCs from architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people, and would disperse rapidly. Therefore, the Project's construction-related impacts concerning odors would be less than significant.

Operations

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as odor sources (i.e., agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding). The Project proposes to install up to seven emergency generators, which would not constantly operate (i.e., they would operate only during maintenance, staff training, testing, and emergency conditions). Additionally, the Project does not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, Project operations would not create objectionable odors and impacts would be less than significant.

Mitigation Measures

MM AQ-1 Generator maintenance, staff training, and testing shall be limited on any single day to no more than 110 minutes for the entire facility (up to 15 generators).

[15] City of El Segundo. (2004). *Circulation Element*. https://www.elsegundo.org/home/showpublisheddocument/1958/637237747168070000 (accessed October 2022).

4.4 Biological Resources

Environmental Issue	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 Game or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
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?				X
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

Impact Analysis

4.4a 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 Game or U.S. Fish and Wildlife Service?

No Impact. According to the El Segundo General Plan Conservation Element, the El Segundo blue butterfly (*Euphilotes battoides allyni*) has been found within the City's boundaries.[16] El Segundo blue butterflies are listed as State and federally endangered. The butterfly's range is recorded to

[16] City of El Segundo. (1992). *Conservation Element*. Retrieved https://www.elsegundo.org/home/showpublisheddocument/370/637110579849570000. Accessed on December 14, 2021.

be on the coast and not known to be found at or near the Project site.[17] Additionally, the Project site is fully developed and devoid of any native vegetation, trees, or sensitive habitats. Therefore, the Project would not have an adverse effect on any species identified as a candidate, sensitive, or special-status species. No impact would occur in this regard and no mitigation is required.

4.4b Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

4.4c 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?

No Impact. No riparian habitats or wetlands are present on or adjacent to the Project site.[18] Therefore, the Project would not have an adverse effect on riparian habitat or other sensitive natural community, or wetlands. No impact would occur in this regard and no mitigation is required.

4.4d Would the project 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?

No Impact. The Project site is fully developed, surrounded by urban development, and not part of an established wildlife corridor. No trees or vegetation are present on the Project site. Additionally, the tree/vegetation nearest the Project site is more than 75 feet to the east. Therefore, the Project would not interfere with the movement of any wildlife species or wildlife corridors. There would be no impact on migratory wildlife or nesting birds and no mitigation is required.

4.4e Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. There are no local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance that are relevant to the Project site. Further, as previously noted, the Project site is devoid of any native vegetation, trees, or sensitive habitat. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources. No impact would occur in this regard and no mitigation is required.

4.4f 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?

No Impact. No areas within the City are located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or

[17] U.S. Fish & Wildlife Service. (Undated). *Environmental Conservation Online System- El Segundo Blue Butterfly*. Retrieved from https://ecos.fws.gov/ecp/species/3135. Accessed on December 14, 2021.
[18] Department of Fish and Wildlife. (2021). *National Wetlands Inventory*. Retrieved from https://www.fws.gov/wetlands/data/mapper.html. Accessed on December 14, 2021.

State habitat conservation plan.[19] Therefore, the Project would result in no conflicts or impacts in this regard and no mitigation is required.

Mitigation Measures

No mitigation is required.

[19] SCAG. (2019). *Data/Map Book- City of El Segundo*. Retrieved from https://scag.ca.gov/sites/main/files/file-attachments/elsegundo.pdf?1604794141. Accessed on December 14, 2021.

4.5 Cultural Resources

This Section considers the *Assembly Bill 52 Communications,* which are included in **Appendix B: Assembly Bill 52 Communications**.

Environmental Issue	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 §15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

Impact Analysis

4.5a Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. ESMC Title 14, *Historic Preservation,*[20] provides for the identification, protection, enhancement, perpetuation and use of historic buildings and structures within the City that reflect special elements of the City's historical heritage. ESMC §15-1-6, *Definitions*, defines a historic site as "any parcel or portion of real property, which has special character or special historical, cultural, architectural, archaeological, community, or aesthetic value." Additionally, in accordance with ESMC §15-14-5, *List of Designated Cultural Resources*, the City maintains a designated cultural resources list. The Project site contains only equipment, concrete pads/footings, gravel and base, and stairs, and the existing adjacent data center (circa 1973) does not embody any distinctive characteristic (i.e., type, period, region, or construction method) with potential historical significance. The Project site and adjacent data center do not contain any historical resources pursuant to ESMC and as defined in State CEQA Guidelines *§15064.5*. Therefore, the Project would not cause an adverse change in the significance of a historical resource. No impact would occur in this regard and no mitigation is required.

4.5b Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. The Project site has already been subject to extensive disruption and contains artificial fill materials.[21] The Project site is underlain by 4.0 to 6.0 feet of artificial fill[22] and would require excavations of only approximately 3.0 feet below the bottom of generator

[20] El Segundo Municipal Code. (2021). *Chapter 14 Historic Preservation*. Retrieved from https://codelibrary.amlegal.com/codes/elsegundoca/latest/elsegundo_ca/0-0-0-12865.
[21] Terracon Consultants, Inc. (2021). Geotechnical Engineering Report.
[22] Ibid.

foundations;[23] thus, no excavations into native soil are anticipated to occur with the Project. Depth of excavation for the proposed equipment would not exceed 5.0 feet, except at the northwest corner where a drywell would be constructed up to 30 feet deep. Due to the extremely narrow width of excavation required for the drywell (approximately 10.0 feet), the drywell is unlikely to encounter archaeological resources. Additionally, only 125 cubic yards of material would be exported during construction of the emergency generators. Given the Project site has already been subject to extensive disruption and contains artificial fill materials, the potential to encounter or impact an as yet unidentified archaeological resource is considered remote. Additionally, the Project site consists of, and is surrounded by, urban/developed land that has been permanently altered due to construction of below and aboveground improvements. Therefore, the Project would result in a less than significant impact concerning the potential to adversely change the significance of an archaeological resource. No mitigation is required.

4.5c Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Given the Project site has already been subject to extensive disruption and contains artificial fill materials, the potential to disturb or impact any human remains is remote. The Project would be constructed on already paved surfaces and would require minimal ground disturbance. Nevertheless, if human remains were found, those remains would require proper treatment in accordance with applicable laws. Public Resources Code §§5097, et seq., and Health and Safety Code §§7050.5-7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. The requirements and procedures set forth in Public Resources Code §5097.98 would be implemented if human remains are discovered, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the "most likely descendant." If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overly adjacent remains until the County Coroner investigates and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains. Compliance with the established regulatory framework would ensure the proper treatment of human remains should they be encountered. Therefore, the Project would result in less than significant impact concerning the potential to disturb any human remains. No mitigation is required.

Mitigation Measures

No mitigation is required.

[23] Ibid.

4.6 Energy

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

Renewable Portfolio Standard

In 2002, California established its Renewable Portfolio Standard program[24] with the goal of increasing the annual percentage of renewable energy in the State's electricity mix by the equivalent of at least 1 percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission subsequently accelerated that goal to 2010 for retail sellers of electricity (*Public Utilities Code* §399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the CARB under its AB 32 authority to enact regulations to help the State meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In September 2010, the CARB adopted its Renewable Electricity Standard regulations, which require all the State's load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation Senate Bill (SB) 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the program's goal to achieve the 50 percent renewable resources target by December 31, 2026 and a 60 percent renewable resources target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Impact Analysis

4.6a Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact.

[24] The Renewable Portfolio Standard is a flexible, market-driven policy to ensure that the public benefits of wind, solar, biomass, and geothermal energy continue to be realized as electricity markets become more competitive. The policy ensures that a minimum amount of renewable energy is included in the portfolio of electricity resources serving a state or country.

Electricity

Southern California Edison (SCE) provides electricity to the Project area. Electricity is currently used by the emergency generators located on the property. Total electricity demand in SCE's service area is forecast to increase by approximately 12,000 GWh—or 12 billion kWh—between 2015 and 2026.[25]

The Project's electrical demand is expected to be served by existing SCE electrical facilities. The Project's construction-related electrical demand is anticipated to be nominal since most construction equipment would be gas- or diesel-powered. The Project's estimated operational electrical demand would total approximately 16,600,000 kWh per year. This would represent 0.13 percent of SCE's forecast 2026 increased demand, thus, would result in a negligible increased demand compared to SCE's overall demand. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the 2019 Building Energy Efficiency Standards. The Project would also be required to comply with CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas to the Project area. Natural gas is currently not used at the Project site.

No construction-related natural gas demand is anticipated for the Project since most construction equipment would be gasoline- or diesel-powered. Additionally, the Project's proposed generators would not use natural gas during operations. Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of natural gas resources.

Fuel

During Project construction, transportation energy use would depend on the type and number of trips, VMT, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be from transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel/gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or construction of new infrastructure. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary fuel consumption.

During Project operations, diesel fuel consumption would be associated with operations of the up to seven proposed emergency generators, which would operate only up to 50 hours per year

[25] California Energy Commission. (2018). *California Energy Demand 2018-2030 Revised Forecast, Figure 49 Historical and Projected Baseline Consumption SCE Planning Area*. Retrieved from https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2017-integrated-energy-policy-report/2017-iepr

per unit. The Project's diesel fuel consumption associated with operation of the proposed emergency generators would be approximately 23,444 gallons per year. The fuel consumption associated with the up to five additional employees resulting from Project implementation would be nominal. The County's annual diesel fuel use in 2021 was 581,646,739 gallons.[26] Estimated Project operational diesel fuel use would represent 0.0004 percent of the County's current diesel use. Thus, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary fuel consumption.

None of the projected energy uses exceed one percent of their corresponding County use. Project operations would not substantially affect existing energy or fuel supplies or resources. Further, the Project would be subject to compliance with applicable energy standards and new capacity would not be required. Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the Project would result in a less than significant impact concerning consumption of energy resources, and no mitigation is required.

4.6b Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Project design and operations would be subject to compliance with State Building Energy Efficiency Standards, appliance efficiency regulations, and CALGreen standards. As concluded in Response 4.6a, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Although the City has not adopted any specific plans that address energy efficiency, the City adopted the *City of El Segundo Climate Action Plan* on December 2017, that has been prepared to help the City comply with the City's GHG emissions reduction goals through implementation of many measures that also result in energy conservation and efficiency. As noted in **Appendix A**, the Project would be consistent with the City's CAP and with the applicable energy efficiency strategies set forth in the CAP. As such, the Project would be designed to meet all applicable State building energy efficiency standards as well as the City's energy efficiency standards. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation would be required.

[26] California Air Resources Board. (2018). *EMFAC2017*.

4.7 Geology and Soils

This Section is based on the *Geotechnical Engineering Report* (Terracon Consultants, Inc., September 2021), which is included in its entirety in **Appendix C: Geotechnical Engineering Report**.

Environmental Issue	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:				
i) 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? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?				X
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?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Impact Analysis

4.7ai Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving the 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? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is 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 (AP) Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. 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). There are no identified Alquist-Priolo Earthquake Fault Zones that traverse the Project site.[27] Additionally, the Project does not propose structures for human occupancy. Therefore, the Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault. No impact would occur in this regard, and no mitigation is required.

4.7aii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. The Project site is within Southern California region, a seismically active area, thus, is exposed to potential risk involving strong seismic ground shaking. The type and magnitude of seismic hazards affecting the Project site would depend upon the distance to causative faults, the intensity, and the magnitude of the seismic event. However, the Project is subject to compliance with the City's regulatory framework (i.e., California Building Code and ESMC §13-1, Building Code), which is intended to minimize potential risk involving seismic ground shaking. Additionally, the Geotechnical Engineering Report concluded "The site appears suitable for the proposed construction based upon geotechnical conditions encountered in the test borings, provided that the recommendations provided in this report are implemented in the design and construction phases of this project."[28] The City would verify compliance with the Geotechnical Engineering Report recommendations through the Project's Building Permit process. Therefore, following compliance with the established regulatory framework and Geotechnical Engineering Report recommendations, the Project would not cause potential substantial adverse effects involving strong seismic ground shaking. A less than significant impact would occur in this regard and no mitigation is required.

[27] California Geological Survey. (2021). *Earthquake Zones of Required Investigation*. Retrieved from https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed on December 14, 2021.
[28] Terracon Consultants, Inc. (2021). *Geotechnical Engineering Report*. page 8

4.7aiii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, three criteria must be met: underlying loose, coarse-grained (sandy) soils, a groundwater depth of approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes.

The Project is not located within a liquefaction zone.[29] Additionally, the Geotechnical Engineering Report concluded, based on California Geological Survey maps and the anticipated depth to groundwater, liquefaction hazard potential at the site is considered low. Other geologic hazards related to liquefaction, such as lateral spreading, are therefore also considered low. Therefore, the Project would not cause potential adverse effects involving seismic-related ground failure, including liquefaction. A less than significant impact would occur in this regard and no mitigation is required.

4.7aiv Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The City and Project site do not lie in a landslide hazard zone.[30] Therefore, the Project would not cause adverse effects involving landslides. No impact would occur in this regard, and no mitigation is required.

4.7b Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project site comprises approximately 0.50-acre, thus, ground disturbances would be nominal with only approximately 125 cubic yards of soil export required (to be backfilled and repaved). ESMC §5-4-9.F requires a project applicant to submit information to the City that the grading will retain sediments onsite, retain construction-related materials and wastes, spills, and residues, prevent discharges to streets and drainage facilities, contain non-stormwater runoff, and contain erosion from slopes and channels through use of BMPs; see **Section 4.10: Hydrology and Water Quality**, for more information regarding LID requirements and implementation. Given the nature and scope of Project construction, and since construction activities would be subject to ESMC standards, the Project would not result in substantial soil erosion or loss of topsoil. A less than significant impact would occur in this regard and no mitigation would be required.

[29] Ibid.
[30] Ibid.

4.7c 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?

No Impact. The Project site would not be subject to seismically-induced liquefaction (see Response 4.7aiii) or landslides (see Response 4.7aiv). The Geotechnical Report concluded the Project site is not within a liquefaction zone, thus, other geological hazards related to liquefaction, such as lateral spreading, are therefore also considered low.[31] Lateral spreading and collapse result from liquefaction and subsidence. Because the site has low liquefaction and subsidence potential, no impact would occur and no mitigation is required.

4.7d 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 risk to life or property?

Less Than Significant Impact. The Uniform Building Code defines expansive soils as soils having an expansion index greater than 20.[32] The Geotechnical Engineering Report concluded existing fill materials are underlain by lean clay soils with expected expansion potential and recommended that such materials not be used in structural areas but may be blended with sandy soils such that the resulting materials conform with the low volume change materials specifications provided in the Report.[33] The Geotechnical Engineering Report further recommends engineered fill extending to a minimum depth of 3.0 feet below the bottom of foundations for the emergency generators, to stabilize the soil. The City would verify compliance with the Geotechnical Engineering Report recommendations through the Project's Building Permit process. Therefore, following compliance with Geotechnical Engineering Report recommendation, the Project would not create substantial risk involving expansive soils. A less than significant impact would occur in this regard and no mitigation is required.

4.7e Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project proposes to install generators, which would not create a demand for wastewater disposal. Further, sewers are available to the existing data center. Therefore, no impact would occur in this regard, and no mitigation is required.

4.7f Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the earth's history and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. The Project site has already been subject to extensive disruption and contains artificial fill materials. The

[31] Ibid.
[32] Uniform Building Code. (1994). *Vol. 2 Structural Engineering Design Provisions*. Retrieved from https://digitalassets.lib.berkeley.edu/ubc/UBC_1994_v2.pdf.
[33] Terracon Consultants, Inc. (2021). *Geotechnical Engineering Report*. Page 11

Project site is underlain by 4.0 to 6.0 feet of artificial fill[34] and would require excavations of only approximately 3.0 feet below the bottom of generator foundations;[35] thus, no excavations into native soil would occur with the Project, except at the northwest corner where a drywell would be constructed up to 30 feet deep. Due to the extremely narrow width of excavation required for the drywell (approximately 10.0 feet), the drywell is unlikely to encounter paleontological resources. Additionally, only 125 cubic yards of material would be exported during construction of the emergency generators. Given the Project site has already been subject to extensive disruption and contains artificial fill materials, the potential to encounter or impact an as yet unidentified paleontological resource is considered remote. Additionally, the Project site consists of, and is surrounded by, urban/developed land that has been permanently altered due to construction of below and aboveground improvements. Therefore, the Project would result in a less than significant impact concerning the potential to destroy a unique paleontological resource directly or indirectly. No mitigation is required.

Mitigation Measures

No mitigation is required.

[34] Ibid.
[35] Ibid.

4.8 Greenhouse Gas Emissions

This Section is based on the Greenhouse Gas Emissions Assessment (Kimley-Horn, October 2022), which is included in its entirety in **Appendix A: Air Quality and Greenhouse Gas Emissions Technical Memorandum**.

Environmental Issue	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?			X	
b) Conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

City of El Segundo Climate Action Plan (CAP)

El Segundo, in addition to 14 other South Bay Cities, have prepared a CAP (2017) to guide the City toward a more sustainable future. The CAP's goal is to reduce the City's GHG emissions. The City's CAP serves as a guide for action by setting GHG emission reduction goals and establishing strategies and policy to achieve desired outcomes over the next 20 years. The CAP outlines various municipal measures that encourage reductions in the following categories: land use and transportation, energy efficiency, solid waste, urban greening, and energy generation and storage.

Table 4.8-1: Description of Greenhouse Gases

Greenhouse Gas	Description
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The Global Warming Potential of N_2O is 298.
Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, approximately 87 percent by volume. Human-related

Table 4.8-1: Description of Greenhouse Gases

Greenhouse Gas	Description
	sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is approximately 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays approximately 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF_6 is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase-out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code §38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a Global Warming Potential of 17,200.

Source: Compiled from: USEPA, *Overview of Greenhouse Gases*, April 11, 2018 (https://www.epa.gov/ghgemissions/overview-greenhouse-gases); USEPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016*, 2018; Intergovernmental Panel on Climate Change, *Climate Change 2007: The Physical Science Basis*, 2007; National Research Council, Advancing the Science of Climate Change, 2010; USEPA, *Methane and Nitrous Oxide Emission from Natural Sources*, April 2010.

South Coast Air Quality Management District Thresholds

The SCAQMD formed a GHG CEQA Significance Threshold Working Group (Working Group) to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This Working Group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and included a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments in the Air Basin, various utilities such as sanitation and power companies throughout the Air Basin, industry groups, and environmental and professional organizations. On December 5, 2008, the SCAQMD Governing Board adopted a 10,000 metric tons of carbon

dioxide equivalent ($MTCO_2e$) industrial threshold for projects where the SCAQMD is the lead agency. However, the SCAQMD has not announced when a GHG threshold for land use projects will be presented to the governing board where the SCAQMD is not the lead agency. The Working Group proposed a 3,000 $MTCO_2e$ threshold for non-industrial projects, but that threshold has not been formally adopted. Nonetheless, the City of Gardena has determined that the 3,000 $MTCO_2e$ is the appropriate threshold to determine the significance of the GHGs arising from the Project's proposed addition of seven generators.

Impact Analysis

4.8a Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.

Short-Term Construction Greenhouse Gas Emissions

The Project would generate greenhouse gas (GHG) emissions directly from construction-related activities. Project construction was assumed to begin July 2022. However, the current Project construction schedule assumes Project construction would begin September 2022, or two months later than assumed in the GHG modeling. However, the GHG modeling concerning the construction schedule is considered conservative because CalEEMod emissions factors for future years decline given advancements in construction equipment technology and fleet turnover.

Table 4.8-2: Construction-Related Greenhouse Gas Emissions provides the approximate daily GHG emissions generated by construction equipment utilized to build the Project. As indicated in **Table 4.8-2**, Project construction-related activities would generate approximately 79 metric tons of carbon dioxide equivalent ($MTCO_2e$)[36] over the course of construction. Consistent with SCAQMD guidance, construction emissions will be amortized over the Project's life, defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold.[37] The amortized Project construction emissions would be approximately 2.6 $MTCO_2e$ per year.

Table 4.8-2: Construction-Related Greenhouse Gas Emissions

Construction	$MTCO_2e$ per Year
Total Construction	79
Amortized over 30 Years	2.6

Source: CalEEMod version 2020.4.0; see **Appendix A: Air Quality and Greenhouse Gas Technical Memorandum** for model outputs.

[36] Metric tons of carbon dioxide equivalent or MTCO2e is the unit of measurement used. The unit " CO_2e" represents an amount of a GHG whose atmospheric impact has been standardized to that of one-unit mass of carbon dioxide (CO_2), based on the gas' global warming potential (GWP). Tool formulas convert standard metrics for electricity, green energy, fuel use, chemical use, water use, and materials management into $MTCO_2e$.

[37] SCAQMD. (2008*). Staff Report for Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008*, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2; page 5.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions would occur over the proposed Project's life. The Project's operational GHG emissions would result from direct emissions such as consumption of fossil fuels in the new generators and new employee trips. **Table 4.8-3: Project Greenhouse Gas Emissions** provides the Project's long-term operational GHG emissions and indicates the Project would generate approximately 663 $MTCO_2e$/year. The Project would not result in an increase in GHG emissions that would exceed the SCAQMD's proposed screening threshold of 3,000 $MTCO_2e$ per year.[38] Therefore, Project-related GHG emissions would be less than significant and no mitigation is required.

Table 4.8-3: Project Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ per Year
Construction Amortized Over 30 Years	2.60
New Generators	635
New Employee Trips	25
Total Project Emissions	**663**
SCAQMD Project Threshold	3,000
Threshold Exceeded?	**No**

Source: CalEEMod version 2020.4.0; see **Appendix A: Air Quality and Greenhouse Gas Technical Memorandum** for model outputs.

4.8b Would the project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

In 2015, the City adopted the Energy Efficiency Climate Action Plan (EECAP) to improve energy efficiency and reduce GHG emissions. The City also adopted a CAP in 2017, with the EECAP serving as a supporting appendix. To develop this EECAP, a GHG emissions inventory was conducted to determine baseline GHG emissions from the community and from municipal operations for calendar year 2005 and 2012. A forecast was made of business-as-usual emissions in the absence of any emissions reduction actions. This forecast was then adjusted to account for the emissions reduction expected from Statewide policies. The 2017 CAP uses the same inventories and reduction targets. To meet the City's GHG reductions target, the City would implement the additional local energy efficiency and GHG reduction measures described in the EECAP and CAP. Reaching the emissions reduction goals requires that residents, businesses, and City government work together.

The proposed Project would be subject to compliance with all building codes in effect at the time of construction, which include energy efficiency measures mandated by the 2019 Building Energy Efficiency Standards. CCR Title 24, Part 6 standards indirectly regulate and reduce GHG emissions

[38] On September 28, 2010, air quality experts serving on the SCAQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level numeric bright-line threshold of 3,000 metric tons of CO_2e annually. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and was composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, and various city and county planning departments. The numeric bright line and efficiency-based thresholds, which were developed for consistency with CEQA requirements for developing significance thresholds, are supported by substantial evidence and provide guidance to CEQA practitioners and lead agencies for determining whether GHG emissions from a proposed project are significant.

because they require energy efficiency features in new construction (e.g., high-efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water-conserving plumbing fixtures). California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 Building Energy Efficiency Standards improved upon the 2016 Standards for new construction of, and additions and alterations to, residential, commercial, and industrial buildings.

The Project proposes to install up to seven additional emergency backup diesel generators on the Project site to support internal electrical/equipment modifications within the existing data center. The Project does not propose a change in land use or increased building floor area to the existing data center. The data center is an existing permitted land use. Given its nature and scope, the proposed Project would not conflict with EECAP/CAP goals, measures, and emission reduction targets and would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, and SB 32. Therefore, Project impacts would be less than significant.

Cumulative Setting

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe.

Cumulative Impacts and Mitigation Measures

It is generally the case that an individual project of the proposed Project's scale and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHG emissions would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the proposed Project, as well as other cumulative related projects, would be subject to all applicable regulatory requirements, which would further reduce GHG emissions. As indicated in **Table 4.8-3**, the proposed Project's GHG emissions would be less than significant. Additionally, as discussed above, the Project would be consistent with the City's EECAP and CAP. As a result, the Project would not conflict with any GHG reduction plan. Therefore, the Project's cumulative contribution of GHG emissions would not be cumulatively considerable and the Project's cumulative GHG impacts would also be less than significant. No mitigation is required.

4.9 Hazards and Hazardous Materials

Environmental Issue	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?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
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?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Impact Analysis

4.9a Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Routine construction activities would involve the transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. The use of these materials during Project construction would be short-term and would occur in accordance with standard construction practices, as well as with applicable federal, State, and local regulations, including the following:

Federal

- Resource Conservation and Recovery Act (42 U.S.C. § 6901 et seq.)

- Clean Water Act, National Pollutant Discharge Elimination System (Section 402[p]) (33 U.S.C. § 1342(p))
- Toxic Substances Control Act (15 U.S.C. § 2601 et seq.)
- Hazardous Materials Transportation Act (49 U.S.C. § 5101 et seq. and 49 C.F.R. Parts 101, 106, 107, and 171–180)
- Hazardous Materials Transportation Uniform Safety Act of 1990 (Public Law 101-615)

State

- Hazardous Materials Release Response Plans and Inventory Law (Cal. Health and Safety Code, § 25500 et seq.)
- Transportation of Hazardous Materials and Wastes (Cal. Code of Regs tit. 26)
- Senate Bill 1082, which created the Certified Unified Program Agency (CUPA)

Local

The City of El Segundo Fire Department is a CUPA, which regulates and oversees:

- Hazardous materials business plans
- California accidental release prevention plans or federal risk management plans
- The operation of underground storage tanks and aboveground storage tanks
- Universal waste and hazardous waste generators and handlers
- Onsite hazardous waste treatment
- Inspections, permitting, and enforcement
- Proposition 65 reporting
- Emergency response

Beyond the statewide regulations, CUPAs administer policies and regulations found in various local and regional plans (i.e., the City's General Plan and Municipal Code) that address hazards and hazardous materials. Policies and regulations are intended as guides for the appropriate use of potentially hazardous materials, the cleanup of contaminated sites, and the preparation of emergency response plans.

Potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Examples of such activities include fueling and servicing construction equipment and applying paints and other coatings. Project construction would be temporary, and on-site activities would be governed by existing regulations of several agencies. Construction activities would be subject to compliance with relevant regulatory requirements and restrictions concerning the transport, use, or disposal to prevent a significant hazard to the public or

environment. The primary regulatory requirements include SCAQMD Rules 1166 (volatile organic compound emissions) and 1466 (fugitive dust-toxic air contaminants).

The Project proposes to install up to seven emergency generators, which would require routine maintenance that would involve diesel fuel, oil, and lubricants. As under existing conditions, these materials would continue to be delivered by qualified vendors who are trained in these substances' transportation requirements, and because the generators are in enclosed containers, any spills would be contained in these areas. The primary hazardous material at the Project site would be diesel fuel associated with the backup generators. Diesel fuel delivery and fueling would be subject to individual vendors and could change over time. However, all activities would be required to comply with the above regulatory framework, and these maintenance activities would be a continuation of the same types of maintenance activities that occur at the data center's existing generators.

Therefore, continued compliance with the regulatory requirements, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant in this regard, and no mitigation is required.

4.9b 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?

Less Than Significant Impact. Project construction would require digging and excavation that could result in the accidental release of hazardous materials, however it is unlikely hazardous materials would be found on the Project site.

Given the proposed Project's nature, the emergency generators would not be used on a consistent basis. Diesel leaks are unlikely, but should they occur, they would be contained within the enclosed generator housing, which is installed on a concrete pad, thus, any spilled diesel fuel could be cleaned up without significant hazard to the public or environment.

The CUPA administers inspections of businesses that use hazardous materials or generate hazardous waste and ensures compliance with federal and state regulations listed in Response 4.9a. Facilities that store, handle, or transport hazardous materials are required to procure business plans and adhere to strict procedures enforced by agencies with jurisdiction over businesses or areas that routinely use or handle hazardous materials. Project operations would comply with all CUPA, U.S. Environmental Protection Agency, and DTSC standards.

Routine maintenance would require diesel fuel for each generator, as discussed above in **Section 4.6: Energy**. Project operations are not expected to release any hazardous materials as a result of foreseeable upset and accident conditions. It is assumed that the use and storage of such materials would continue to occur in compliance with applicable standards and regulations, and would not pose significant hazards. It is anticipated that the use of such hazardous materials would not create a significant hazard associated with a risk of upset or accident conditions involving the release of hazardous materials during Project operations. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.9c Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The Project site is within 500 feet of the City of El Segundo Wiseburn School District Aquatics Center and within 0.3-mile of the main school building located at 201 North Douglas Street, El Segundo. However, the Project proposes emergency backup generators, which would not emit significant quantities of hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Project operations would result in diesel fuel usage and associated DPM; however, the Project's operational DPM emissions would be far below all health risk thresholds; see **Table 4.3-7: Operational Health Risk**. Further would operate only under emergency conditions or during routine maintenance. Therefore, the Project would result in a less than significant in this regard, and no mitigation is required.

4.9d Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks (USTs) having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. A regulatory agency database search was conducted and determined that no Cortese sites were identified as on the Project site.[39] Therefore, no impact would occur in this regard, and no mitigation is required.

4.9e 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?

No Impact. The Los Angeles International Airport (LAX) is located 0.5-mile north of the Project site. However, the Project site is not within the Airport Noise Contour or the Noise Contour Map boundary shown in LAX Part 150 Noise Exposure Map Update Report, Exhibit 5-2.[40] Also, the Project site is not within the Airport Influence Area pursuant to the Los Angeles County Airport Land Use Commission's *GIS Interactive Map* (A-NET).[41] Therefore, the Project would not result in

[39] CalEnviroStor. (2022). *EnviroStor Database*. Retrieved from https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=444+north+nash+street. Accessed on January 11, 2022. California Waterboards. (2022). *GeoTracker*. Retrieved from https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Sacramento. Accessed April 21, 2022.

[40] Los Angeles International Airport. (2016). *LAX Part 150 Noise Exposure Map Update Report*. Retrieved from https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/lax-part-150-noise-exposure-map-update/nem-update-documents. Accessed on January 11, 2022.

[41] Los Angeles County. (2016). *A-NET*. Retrieved from https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a. Accessed April 21, 2022.

an airport-related safety hazard or excessive noise for people working in the Project area. No impact would occur in this regard, and no mitigation is required.

4.9f Would the project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?

No Impact. The Project site totals only 0.50 acre and is located in the northeast portion of the property, where adequate circulation and access is provided to facilitate emergency response. The nearest disaster route is Sepulveda Boulevard, 0.4-mile west of the Project site.[42] Construction activities are expected to be contained within the Project site boundaries and would not obstruct the adjacent roadway to the west (Nash Street). Therefore, the Project would not impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan. No impact would occur in this regard, and no mitigation is required.

4.9g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project site is in a fully urbanized area and it is not adjacent to any wildland. Additionally, the Project site is not within a very high fire severity zone (VHFSZ); see **Section 4.20: Wildfire**. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires. No impact would occur, and no mitigation is required.

[42] County of Los Angeles Department of Public Works. (June 25, 2008). *Disaster Route Maps (by City), City of El Segundo*.

4.10 Hydrology and Water Quality

This Section is based on the Low Impact Development (LID) Report (Kimley-Horn and Associates, Inc. September 2021), which is included in its entirety in **Appendix E: Low Impact Development Plan.**

Environmental Issue	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 groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?			X	
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.			X	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(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			X	
iv) Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Impact Analysis

4.10a Would the project violate water quality or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The Project's construction-related activities would include nominal excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Construction-related erosion effects

would be addressed through compliance with ESMC Title 5, *Storm Water and Urban Runoff Pollution Controls*, which specifies development requirements to reduce pollutants in stormwater and urban runoff to the maximum extent practicable. Following compliance with ESMC §5-4-9 requirements, construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

The Los Angeles County Flood Control District (LACFCD), the County, and the City along with 83 other incorporated cities therein (Permittees) discharge pollutants from their municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in Order No. R4-2012-0175[43] (NPDES Permit No. CAS004001), *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*, which was adopted November 8, 2012.[44] The MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Los Angeles County watersheds, which includes the City. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its Low Impact Development (LID) Ordinance to require projects to comply with NPDES MS4 Permit water quality requirements.

The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 SF or greater impervious surface area. The Project is a redevelopment project which would replace 10,000 SF or more of impervious surface area; as such, the Project is subject to Los Angeles County's LID Ordinance. Additionally, ESMC §5-4-8: *Best Management Practices Required*, specifies that new development and redevelopment projects are subject to the MS4. LID controls effectively reduce the amount of impervious area of a completed project site and promote the use of infiltration and other controls that reduce runoff. Source control BMPs prevent runoff contact with pollutant materials that would otherwise be discharged to the MS4. Specific structural controls are also required to address pollutant discharges from certain uses including but not limited to housing developments, parking lots, and new streets, among others.

Infiltration is Los Angeles County's first option when screening potentially feasible LID BMPs. Infiltration systems collect stormwater runoff and conduct it into permeable soils beneath the site; effectively reducing pollution, reducing runoff and flooding, and recharging groundwater. The Project would treat site runoff in accordance with the Los Angeles County Low Impact Development Manual, 2014. To do so, the Project proposes a 30-foot-deep drywell in order to achieve this. The drywell system would have the capacity to process up to 2,277 cubic feet (CF)

[43] State of California Water Quality Control Board. (undated). *Order No. R4-2012-0175 NPDES Permit NO. CAS004001*. Los Angeles, CA: State of California Water Quality Control Board.
[44] Ibid.

of water per day, which is a 1,538 CF improvement in runoff capacity over existing conditions. The drywell would also include a Bio Clean Screening Filter that would pre-treat captured water before its return to the wastewater system. The Project would not only comply with existing wastewater regulations, but would improve the site's current drainage and water processing conditions.

Following compliance with NPDES and ESMC requirements, Project operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, the Project would result in a less than significant in this regard, and no mitigation is required.

4.10b 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?

Less Than Significant Impact. Basin recharge occurs through percolation of precipitation and artificial recharge activities at spreading grounds, among other sources. The Project site was previously developed and the proposed Project would maintain the site's 100 percent effective impervious area. The Project would not interfere with groundwater recharge given the Project proposes a 30-foot-deep drywell, which would increase the Project site's capacity to process runoff by 1,538 cubic feet (CF). This would allow a greater volume of stormwater to infiltrate into the groundwater after being treated, improving groundwater recharge rates. Additionally, although the Project would generate a nominal water demand (approximately 1,535 gallons per day (GPD), see Response 4.19b), the City does not use groundwater as a potable water source. Therefore, the Project's water demands would not decrease groundwater supplies. Finally, as concluded in Response 4.10e, most run-off would occur from natural rain events and the maintenance of landscaping that is not directly connected to the Project. The Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

4.10c Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of 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?

Less Than Significant Impact. The Project site is within Zone X of the applicable FEMA flood map, corresponding to an Area of Minimal Flood Hazard.[45] In the current condition, the runoff from the Project site flows northeasterly and southeasterly towards Duley Road where the water travels through gutters into catch basins untreated. The proposed Project would maintain the site's 100 percent impervious surface coverage and therefore would not change the site' surface run-off volumes. Additionally, the Project would include a 30-foot drywell that would improve site drainage and redirect flows, which would minimize potential flooding and allow the Project site to treat a greater volume of run-off. With the proposed drywell, the site's existing runoff capacity (i.e., the volume of run-off that can be treated onsite) would increase by 1,538 CF. By increasing the site's run-off capacity while maintaining the same amount of impervious area, the Project would enable treatment of run-off from greater rain events. By improving the site's drainage, the potential for flooding would be further minimized. Additionally, the Project site is not located in any geologically hazardous or flooding areas that would increase the likelihood of erosion or flooding on-site; see **Section 4.7: Geology and Soils** and Response 4.10d. The system would also prevent the exceedance of stormwater drainage systems in the area and would treat run off before leaving the site. While the new drywell would slightly redirect flows, drainage and water treatment would be improved. Therefore, the Project would result in a less than significant effect concerning alterations to drainage and surface runoff volumes/flooding, and no mitigation is required.

4.10d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. The Project site is in an area of minimal flood hazard as noted above.[46] Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water that can occur in response to ground shaking. The Project site is approximately 2.65 miles east of the Pacific Ocean and there are no nearby bodies of standing water. Tsunamis and seiches do not pose hazards due to the Project site's inland location and lack of nearby bodies of standing water. Additionally, the Project site is not within a tsunami zone according to the Department of Conservation.[47] The Project proposes the installation of up to seven emergency generators that would involve the use of materials associated with routine maintenance, such diesel and other products associated with machinery maintenance. The Project is not within a flood hazard, tsunami, or seiche zone and would not risk the release of pollutants. Therefore, potential impacts associated with inundation by flood hazard, tsunami, or seiche would be less than significant, and no mitigation is required.

[45] Federal Emergency Management Agency. (2022). *National Flood Hazard Layer FIRMette.* Retrieved from https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.41035951785176,33.91329149209945,-118.36881746462802,33.93109698617504.

[46] Ibid.

[47] Department of Conservation. (2021). *Tsunami Risk Zone*. Retrieved from https://www.conservation.ca.gov/cgs/tsunami/maps. Accessed on January 10, 2022.

4.10e Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Project site is within the West Coast Groundwater Basin. Groundwater levels are managed within a safe basin operating range to protect the LA Basin's long-term sustainability and to protect against land subsidence. The Southwest System is supplied by two active, Golden State Water Company (GSWC)-owned wells in the Central Basin and 12 active, GSWC-owned wells in the West Coast Basin. The Southwest System has a total normal year active well capacity of 10,865 gpm (17,525 AFY), of which 8,715 gpm (14,057 AFY) is in the West Coast Basin, and 2,150 gpm (3,468 AFY) is in the Central Basin. The Central Basin's groundwater storage capacity is approximately 13.8 million AF. The storage capacity of the West Coast Basin's primary water producing aquifer, the Silverado aquifer, is estimated to be 6.5 million AF.

The Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline.

The SGMA requires local Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or to develop Alternatives to GSPs. GSPs provide a roadmap for how groundwater basins will reach long-term sustainability.

The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The Project site is located in a very low priority basin,[48] therefore, there is no GSP available/required for the Project area. Additionally, the City's water use in 2020 (most recent UWMP) was 307 gallons per capita per day (GPCD), well below the SBX7-7 2020 target of 411 GPCD.[49] As discussed in Response 4.19b, the Project would result in only a nominal increase in water demand (approximately 1,535 GPD) and the City does not use groundwater as a potable water source. Therefore, the Project's water demands would not decrease groundwater supplies. Also, the Project would not interfere with groundwater recharge given the Project proposes a 30-foot deep drywell, which would increase the Project site's capacity to process runoff, allowing a greater volume of stormwater to infiltrate into the groundwater after being treated, improving groundwater recharge rates. Further, the City would continue to comply with SBX7-7 requirements. Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant in this regard, and no mitigation is required.

[48] California Department of Water Resources. (2020). *Basin Prioritization Dashboard*. Retrieved from https://gis.water.ca.gov/app/bp-dashboard/final/.

[49] City of El Segundo. (2021). *2020 Urban Water Management Plan*. Retrieved from https://wuedata.water.ca.gov/public/uwmp_attachments/7228116691/ElSegundo.2020UWMP.FINAL.pdf.

4.11 Land Use Planning

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
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?				X

Impact Analysis

4.11a Would the project physically divide an established community?

No Impact. Examples of projects that could physically divide an established community include a new freeway or highway that traverses an established neighborhood. There are no established communities in the Project area; see **Table 2-1: Onsite and Surrounding Land Uses**. The Project proposes to install up to seven emergency generators. No new streets or other physical barriers which could physically divide an established community are proposed. Therefore, the Project would not physically divide an established community. No impact would occur in this regard, and no mitigation is required.

4.11b 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?

Less Than Significant Impact.

General Plan

The Project site's land use designation is Urban Mixed Use North.[50] The Urban Mixed Use North land use designation is intended to allow a range of uses including offices, hotels, and retail as well as light industrial, with a discretionary permit. The Project proposes to install up to seven emergency generators in continuation of an existing data center, which already operates eight emergency generators. The proposed Project would not conflict with the Urban Mixed Use North designation's intended uses as described above. Additionally, the Project would not expand or alter floor area.

Zoning

The Project site is zoned Urban Mixed Use North (MU-N), which is intended to provide area(s) where a mixture of compatible commercial, office, research and development, retail and hotel uses can locate and develop in a mutually beneficial manner. As previously noted, the Project proposes to install up to seven emergency generators in continuation of an existing light

[50] City of El Segundo. (2010). *Land Use Map Revised 2010.* Available https://www.elsegundo.org/home/showpublisheddocument/362/637110574435030000.

industrial use (i.e., a data center), which already contains eight emergency generators. The proposed improvements would be subject to compliance with the MU-N development standards specified in ESMC §15-5E-7, which would be verified through the City's site review process outlined in ESMC §15-25. The proposed Project would not conflict with the MU-N North designation's intended uses as described above.

The Applicant seeks approval of one entitlement - to amend Environmental Assessment No. EA-971, a 2012 discretionary City approval for the existing data center. As discussed in **Section 2.2: Background and History**, in 2012, the data center building was proposed to be expanded from 116,756-SF to 180,422-SF. The *T5 Data Center Expansion Project EA 971 444 N. Nash Street Initial Study/Mitigated Negative Declaration* (RBF Consulting, December 3, 2012) was prepared to evaluate the environmental impacts of the proposed data center expansion, which was approved in 2013.

Therefore, no conflict with the General Plan or ESMC, or significant environmental impact due to a conflict, would occur. A less than significant impact would occur in this regard, and no mitigation is required.

4.12 Mineral Resources

Environmental Issue	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?				X
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?				X

Impact Analysis

4.12a 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?

4.12b 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?

No Impact. There are no mineral resources or recovery sites present on the Project site, as the property is an existing data center with approximately 4.0 to 6.0 feet of artificial fill.[51] Therefore, the Project would not result in the loss of availability of a known mineral resource or a locally-important mineral resource recovery site. No impact would occur in this regard, and no mitigation is required.

[51] Terracon Consultants, Inc. (2021). Geotechnical Engineering Report.

4.13 Noise

This Section is based on the Noise Analysis Memorandum (Kimley-Horn & Associates, Inc., October 2022), which is included in its entirety in **Appendix F: Noise Analysis Technical Memorandum.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate 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?		X		
b) Generate of excessive ground borne vibration or groundborne noise levels?			X	
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?			X	

Sound and Environmental Noise

Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or annoying sound. In acoustics, the fundamental model consists of a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of a base of steady background noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micropascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a

practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

Noise Descriptors

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the noise's effect on people is largely dependent on the noise's total acoustical energy content, as well as the time when the noise occurs. The equivalent noise level (L_{eq}) is the average noise level averaged over the measurement period, while the day-night noise level (L_{dn}) and Community Equivalent Noise Level (CNEL) are measures of energy average during a 24-hour period, with dB weighted sound levels from 7:00 PM to 7:00 AM. Most commonly, environmental sounds are described in terms of an average level (L_{eq}) that has the same acoustical energy as the summation of all the time-varying events.

A-Weighted Decibels

The perceived loudness of sounds is dependent on many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable and can be approximated by dBA values. There is a strong correlation between dBA and the way the human ear perceives sound. For this reason, the dBA has become the standard tool of environmental noise assessment. All noise levels reported in this Section are in terms of dBA, but are expressed as dB, unless otherwise noted.

Addition of Decibels

The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic dB is A-weighted, an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3.0 dBA higher than one source under the same conditions. Under the dB scale, three sources of equal loudness together would produce an increase of 5.0 dBA.

Sound Propagation and Attenuation

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6.0 dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern. Sound levels attenuate at a rate of approximately 3.0 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of

1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of 3.0 dB per doubling of distance is assumed.

Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by approximately 5.0 dBA, while a solid wall or berm reduces noise levels by 5.0 to 10 dBA. The manner in which older homes in California were constructed generally provide a reduction of exterior-to-interior noise levels of approximately 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:

- Except in carefully controlled laboratory experiments, a 1.0-dBA change cannot be perceived by humans.
- Outside the laboratory, a 3.0-dBA change is considered a just-perceivable difference.
- A minimum 5.0-dBA change is required before any noticeable change in community response would be expected. A 5.0-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud

noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over eight hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement concerning these different sources' relative annoyance. A noise level of approximately 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance.

Existing Noise Sources

The City is impacted by various noise sources, including mobile and stationary. Mobile noise sources, especially cars, trucks, and trains are the City's most common and substantial noise sources. Other noise sources throughout the City are the various land uses (i.e., residential, commercial, institutional, and recreational) that generate stationary-source noise.

As previously noted, the Project site comprises approximately 0.5-acre of an existing approximately 6.14-acre data center. The Project site doesn't contain any existing noise generating sources. Land uses surrounding the Project site include the existing data center, commercial, office, and recreational uses.

Mobile Sources. Mobile sources of noise, especially aircraft and cars, are the City's most common and significant noise sources. Compared to other Los Angeles County areas, the City is heavily affected by major noise sources including LAX. The primary mobile noise sources in the Project area are the motor vehicles traveling on North Nash Street and East Mariposa Avenue. LAX, which is north of the Project site, is also a primary mobile noise source in the Project area. However, the Project site is located outside LAX' 65 dBA noise contour; see Response 4.9e.

Stationary Sources. The primary stationary noise sources in the Project vicinity are those associated with the existing data center's generators, vehicles, and heating, ventilation, and air conditioning (HVAC) equipment. Such noise sources include idling vehicles and machinery noise. The noise associated with these sources may represent a single-event noise occurrence or short-term noise.

Noise Measurements

To quantify noise levels in the Project area, three short-term ambient noise measurements were conducted; see **Appendix F**. The average noise levels and sources of noise measured at each location are listed in **Table 4.13-1: Existing Noise Measurements,** and shown on **Exhibit 4.13-1: Noise Measurement Locations**. In addition, two noise measurements were taken to obtain

reference noise levels for the operation of the proposed emergency generators. This data was used to determine impacts from the addition of future similar generators.

Table 4.13-1: Existing Noise Measurements

Site #	Location	Date	Time	Duration	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
1	The northwest corner of the El Segundo Aquatics Center at 2240 East Grand Avenue	12/17/2021	7:28 AM	10 min	65.1	58.6	74.5
2	Approximately 15 feet from Generator 1 at the Project site	12/17/2021	8:09 AM	5 min	60.9	54.8	71.7
3	Approximately 15 feet from Generator 1 at the Project site (reference noise level measurement with generator running).	12/17/2021	8:16 AM	8 min	71.8	60.4	74.2
4	Approximately 35 feet east of the on-site generator area, along Duley Road (reference noise level measurement with generator running).	12/17/2021	8:35 AM	8 min	63.9	57.5	74.5
5	Approximately 35 feet east of the on-site generator area, along Duley Road.	12/17/2021	8:43 AM	10 min	61.2	72.9	72.9

dBA = A-weighted decibel; L_{eq} = Equivalent Noise Level; L_{min} = Minimum Noise Level; L_{max} = Maximum Noise Level

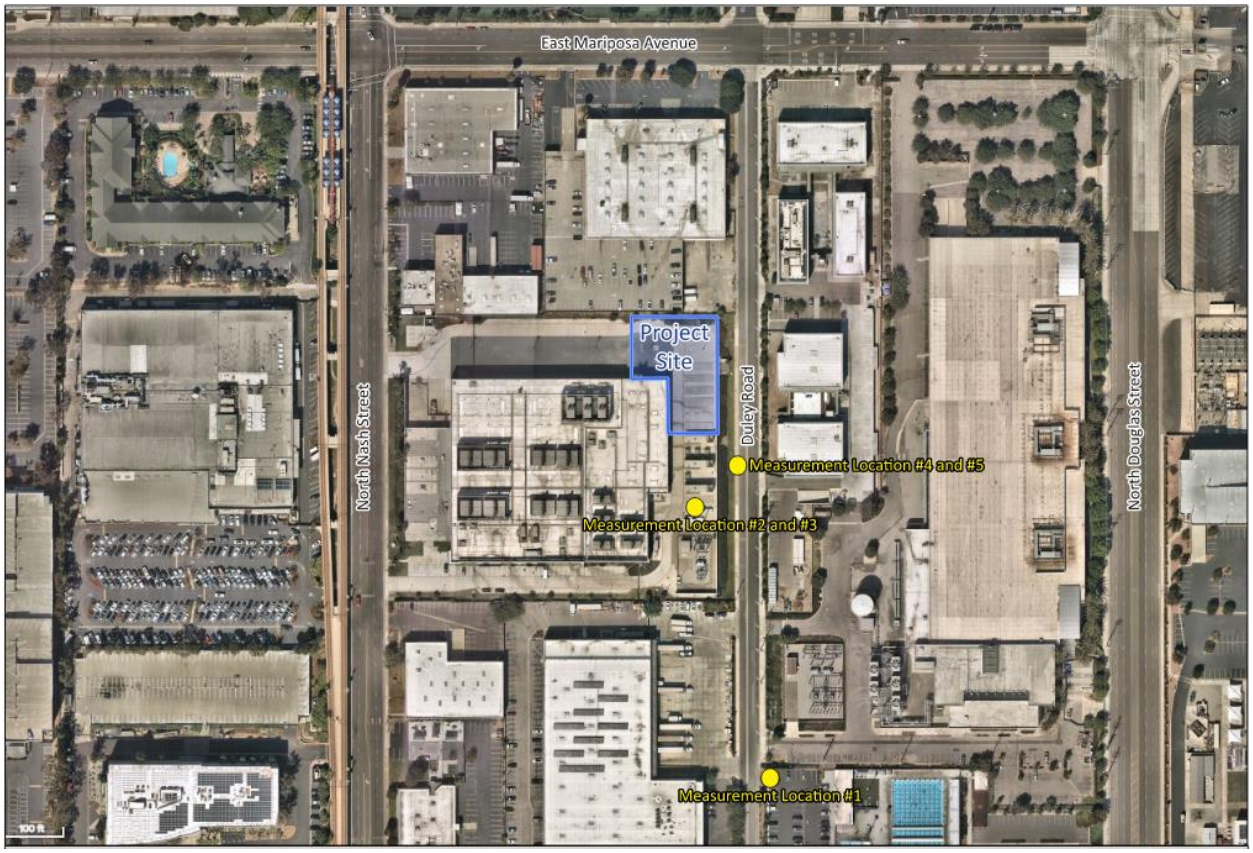
Source: Noise measurements taken by Kimley-Horn on December 17, 2021. See **Appendix F: Noise Analysis Technical Memorandum** for noise measurement results.

Noise-Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance. Noise-sensitive receptors near the Project site consist mostly of recreational uses. However, the nearby commercial uses are included as receptors because of City thresholds. **Table 4.13-2: Noise-Sensitive Receptors**, identifies the noise-sensitive receptors and receptors within the Project vicinity, as well as their distances and directions from the Project site.

Table 4.13-2: Noise Sensitive Receptors			
Description	**Land Use**	**Noise Type**	**Distance and Direction from Project**
United States Postal Service	Commercial	Construction Noise and Vibration	Approximately 50 feet (16 meters) north of Project construction area
		Operational Noise	Approximately 105 feet (32 meters) north of proposed generators
Campus El Segundo Soccer Fields	Recreational	Construction Noise and Vibration	Approximately 475 feet (145 meters) north of Project construction area
		Operational Noise	Approximately 475 feet (145 meters) north of proposed generators
El Segundo Aquatics Center	Recreational	Construction Noise and Vibration	Approximately 670 feet (204 meters) southeast of Project construction area
		Operational Noise	Approximately 350 feet (107 meters) southeast of proposed generators
Commercial/Office Building	Commercial	Construction Vibration and Vibration	Approximately 150 (48 meters) feet east of Project construction area
		Operational Vibration	Approximately 105 feet (32 meters) east of proposed generators

Exhibit 4.13.1: Noise Measurement Locations



Regulatory Setting

City of El Segundo General Plan

The El Segundo General Plan Noise Element (1992), which contains an overview of the City's existing noise conditions, is intended to describe existing noise conditions and provide a statement of goals, policies, and programs designed to minimize existing and foreseeable noise impacts.

City of El Segundo Noise Element

The Noise Element includes the following policy applicable to the proposed Project:

Policy N1-2.1: Require all new projects to meet the City's Noise Ordinance Standards as a condition of building permit approval.

City of El Segundo Municipal Code

The following ESMC sections are applicable to the proposed Project:

ESMC §7-2-1: Declaration of Policy

It is hereby declared to be the policy of the City to prohibit unnecessary, excessive and annoying noises and vibrations from all sources subject to its police power. Therefore, the City Council does ordain and declare that creating, maintaining, causing or allowing to be created, caused or maintained, any noise or vibration in a manner prohibited by or not in conformity with the provisions of this chapter, is a public nuisance as well as an infraction and shall be punishable as such. (Ord. 1242, 1-16-1996).

ESMC §7-2-4: Noise Standards

No person shall, at any location within the City, create any noise, nor shall any person allow the creation of any noise within the person's control on public or private property (hereinafter "noise source"), which causes the noise level when measured on any other property (hereinafter "receptor property"), to exceed the applicable noise standard, except as set forth in subsection C1 of this section.

A. Residential Property: Five (5) dBA above the ambient noise level.

B. Commercial and Industrial Properties: Eight (8) dBA above the ambient noise level.

C. Adjustments:

1. Increases to the noise standards as set forth in subsections A and B of this Section may be permitted in accordance with the following:

Table 4.13-3: Noise Standards Adjustments	
Permitted Increase (dBA)	**Duration of Increase (Minutes)***
0	30
5	15
10	5
15	1
20	Less than 1
*Cumulative minutes during any one hour	

2. *If the receptor property is located on a boundary between two (2) different noise zones, the lower noise level standard applicable to the quieter zone shall apply. (Ord. 1242, 1-16-1996).*

ESMC §7-2-7: Standards; Criteria:

The standards which shall be considered in determining whether a violation of the provisions of Section 7-2-6 of this Chapter exists shall include, but shall not be limited to, the following criteria:

A. The frequency of the noise;

B. The intensity of the noise;

C. Whether the nature of the noise is usual or unusual;

D. The ambient noise level;

E. The proximity of the noise to residential sleeping facilities;

F. The nature and zoning of the area within which the noise emanates;

G. The density of the inhabitation of the area within which the noise emanates;

H. The time of the day or night the noise occurs;

I. The duration of the noise;

J. Whether the noise is recurrent, intermittent or constant; and

K. Whether the noise is produced by a commercial or noncommercial activity. (Ord. 1242, 1-16-1996)

ESMC §7-2-8: Specific Prohibitions

The following acts, and the causing thereof, are declared to be in violation of this Chapter if they occur in such a manner as to disturb the peace, quiet and comfort of any reasonable person of normal sensitivity residing in the area; and occur:

A. Between the Hours Of 10:00 P.M. And 7:00 A.M:

1. *Operating, playing or permitting the operation or playing of any radio, television, phonograph, drum, musical instrument, sound amplifier, or similar device which produces, reproduces or amplifies sound.*

2. *Using or operating any loudspeaker, public address system or similar device.*

3. *Loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans, or similar objects.*

4. *Repairing, building, rebuilding, adjusting or testing any motor vehicle.*

B. *Between The Hours Of 8:00 P.M. And 7:00 A.M:*

1. *Refuse Collection Vehicles:*

a. *Collection of refuse with a collection vehicle in a residential area or within five hundred feet (500') thereof;*

b. *Operation or permitting the operation of the compacting mechanism of any motor vehicle which compacts refuse in a residential area or within five hundred feet (500') thereof.*

2. *Loudspeakers/Public Address Systems: Using or operating for any commercial purpose any loudspeaker, public address system, or similar device on a public right of way or public space.*

3. *Powered Model: Operating or permitting the operation of powered models. (Ord. 1242, 1-16-1996)*

ESMC §7-2-10: Exemptions

The following activities shall be exempted from the provisions of this Chapter:

D. *Construction Noise: Between the Hours Of 10:00 P.M. And 7:00 A.M: Noise sources associated with or vibration created by construction, repair, or remodeling of any real property, provided said 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.*

Impact Analysis

4.13a Would the project result in generation 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?

Less Than Significant Impact With Mitigation Incorporated.

Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high

levels. During construction, exterior noise levels could affect noise-sensitive receptors near the construction site. Construction activities may include demolition, trenching, generator installation, and concrete pouring. Such activities may require concrete/industrial saws, backhoes during demolition, cranes, forklifts, generators, and tractors during generator installation. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than 1 minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical noise levels associated with individual construction equipment are listed in **Table 4.13-4: Typical Construction Noise Levels.**[52]

Table 4.13-4: Typical Construction Noise Levels[1]

Equipment	Typical Noise Level (dBA) at 50 feet from Source[2]
Backhoe	80
Concrete Mixer	85
Crane, Mobile	83
Dozer	85
Generator	82
Concrete Saw	76
Truck	84

Note:
Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018
Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$
Where: dBA_2 = estimated noise level at receptor; dBA_1 = reference noise level; d_1 = reference distance; d_2 = receptor location distance
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018

Following the methodology for quantitative construction noise assessments in the Federal Transit Administration's (FTA's) *Transit Noise and Vibration Impact Assessment Manual* (September 2018) (FTA Noise and Vibration Manual), the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) was used to predict construction noise at the nearest receptors (i.e., the commercial and recreational uses located approximately 80 feet and 670 feet, respectively, from the Project construction area). For the construction noise analysis, the center point of construction activity is used; this differs from the distance to noise sensitive receptors, which is typically calculated property line to property line. **Table 4.13-5: Project Construction Noise Levels** shows the estimated exterior construction noise levels at the nearest noise-sensitive receptors.

[52] This Project will not use a pile driver, thus, typical noise levels for pile drivers are excluded.

Table 4.13-5: Project Construction Noise Levels

Construction Phase	Receptor Location			Worst Case Modeled Exterior Noise Level (dBA L_{eq})[2]	Noise Threshold (dBA L_{eq})[3]	Exceeded?
	Land Use	Direction	Distance (feet)[1]			
Demolition	Commercial	North	80	79.7	85	No
	Recreational	Southeast	670	61.3	85	No
Grading	Commercial	North	80	78.6	85	No
	Recreational	Southeast	670	60.1	85	No
Building Construction	Commercial	North	80	76.7	85	No
	Recreational	Southeast	670	60.1	85	No
Paving	Commercial	North	80	72.6	85	No
	Recreational	Southeast	670	54.1	85	No

Note:
1. Per the methodology described in the FTA Noise and Vibration Manual (September 2018), distances are measured from the nearest receptors to the center of the Project construction site.
2. Assumes a 5 dBA reduction from intervening perimeter walls along the northern and eastern property boundary.
3. The City does not have a quantitative noise threshold for construction noise for commercial uses (they have construction noise standards for residential uses only). Therefore, the construction noise thresholds from the FTA Noise and Vibration Manual (September 2018) are used for this analysis.

Source: Federal Highway Administration, Roadway Construction Noise Model, 2006. Refer to **Appendix F: Noise Analysis Technical Memorandum** for noise modeling results.

As shown in **Table 4.13-5**, the highest anticipated construction noise level of 79.7 dBA (during the demolition phase) would not exceed the FTA noise threshold of 85 dBA for commercial uses. In addition, compliance with ESMC §7-2-10(D) would further minimize impacts from construction noise, as construction would be limited to the hours of 7:00 AM to 6:00 PM Monday through Saturday and is prohibited at any time on Sunday or a Federal holiday. Therefore, because Project construction noise levels would not exceed FTA noise standards and construction activities would be required to comply with ESMC provisions, Project construction would result in a less than significant noise impact. Further, although construction noise levels may exceed the existing ambient levels in the area, construction would be temporary and would not result in a permanent increase in ambient noise levels in the area.

Operational Noise

Project implementation would introduce new stationary noise sources on the Project site. The primary noise sources associated with the Project that could potentially impact nearby noise-sensitive receptors are the emergency generators and associated equipment.

Stationary Noise from Generators

The primary noise sources associated with the Project would consist of the periodic testing of seven new generators, of which five generators (3516C, 2,500 kW) would be located on the data center's north side and two generators (C-32, 1,250 kW) would be located on the data center's east side adjacent to eight existing generators. Of the seven generators, three would be at ground level on concrete pads and four would be on platforms up to approximately 30 feet tall. The seven proposed generators would include housing for mechanical equipment that would reduce noise levels. The generators would operate only during staff training and equipment maintenance/testing (between the hours of 7:00 AM and 10:00 PM) and emergency conditions,

thus, would not operate on a constant basis. In addition, it is noted that periodic generator maintenance/testing would occur sequentially (one at a time), such that no more than one generator is tested at a time; see **MM NOI-1**.

Based on the reference noise levels in **Table 4.13-1**, one generator would produce noise levels up to 63.9 dBA L_{eq} at 35 feet with attenuation from the perimeter wall. The nearest off-site property is a United States Post Office (USPS) facility located approximately 50 feet north of the Project's proposed generators. Noise has a decay rate due to distance attenuation, which is calculated based on the Inverse Square Law of sound propagation. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source. As a result, generator noise would attenuate to approximately 60.8 dBA L_{eq} at the nearest property line to the north. ESMC §7-2-4(B) specifies that the noise standard for commercial and industrial properties is eight (8) dBA over the ambient noise level. Thus, the estimated noise standard for commercial and industrial properties would be 69.2 dBA L_{eq} (i.e., the measured ambient noise level of 61.2 dBA L_{eq} (see **Table 4.13-3**) plus 8 dBA). Therefore, since Project-generated noise levels from periodic generator maintenance/testing (60.8 dBA L_{eq}) would not exceed the 69.2 dBA threshold at the nearest off-site uses, generator noise levels from the Project would comply with ESMC standards and a less than significant impact would occur in this regard.

Mitigation Measure

MM NOI-1 Maintenance/testing for each individual generator shall occur sequentially (one at a time) and during normal daytime hours (i.e., between 7:00 AM and 10:00 PM). Simultaneous generator maintenance/testing of two or more generators shall be prohibited.

4.13b Would the project generate excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Construction

Increases in ground-borne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The FTA has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building 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 vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with

reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage. This analysis uses the FTA architectural damage criterion for continuous vibrations at non-engineered timber and masonry buildings of 0.2 inch-per-second peak particle velocity (PPV) and human annoyance criterion of 0.4 inch-per-second PPV in accordance with Caltrans guidance[53] to evaluate potential construction vibration impacts.

Table 4.13-6: Typical Construction Equipment Vibration Levels, lists vibration levels at 25 feet for typical construction equipment. The nearest off-site building/structure is the industrial building located approximately 150 feet east of the Project construction area. Groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 4.13-6**, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction would range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

Table 4.13-6: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 150 Feet (in/sec)
Large Bulldozer	0.089	0.0061
Loaded Trucks	0.076	0.0052
Jackhammer	0.035	0.0024
Small Bulldozer/Tractors	0.003	0.0002

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

As shown in **Table 4.13-6**, at 150 feet the vibration velocities from construction equipment would not exceed 0.089 in/sec PPV, which would be below the FTA's 0.20 in/sec PPV threshold for building damage and Caltrans' 0.4 in/sec PPV threshold for human annoyance. It is also acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point nearest off-site structures. Therefore, construction vibration impacts associated with the proposed Project would be less than significant and no mitigation is required.

Operations

During operations, the proposed Project would include minimal vibration-generating uses or operations. The nearest off-site structures are located 105 feet from the proposed generator locations and would not be exposed to high vibration levels. Therefore, operational vibration impacts from Project operations would be less than significant and no mitigation is required.

[53] California Department of Transportation. (September 2013). *Transportation and Construction Vibration Guidance Manual, Table 20.*

4.13c Would the project be 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?

Less Than Significant Impact. Refer to Response 4.9e. Additionally, there are no private airstrips located within the Project vicinity. Therefore, the Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels. Impacts would be less than significant in this regard, and no mitigation is required.

Cumulative Noise Impacts

The Project's construction activities would not result in a substantial temporary increase in ambient noise levels. ESMC §7-2-8 and ESMC §7-2-10 which limit construction noise to between the hours of 10:00 PM and 7:00 AM. Noise sources associated with or vibration created by construction, repair, or remodeling of any real property, provided said activities do not take place between the hours of 6:00 PM and 7:00 AM. Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project site and vicinity. Thus, cumulative operational noise impacts from related projects, in conjunction with Project-specific noise impacts, would not be cumulatively significant.

4.14 Population and Housing

Environmental Issue	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 (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Impact Analysis

4.14a 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)?

No Impact. The Project does not propose construction of new homes or businesses or to extend roads or other infrastructure, which have potential to induce substantial unplanned population growth. The Project proposes to construct up to seven emergency generators and increase the onsite jobs by up to five employees.[54] Currently, the City's employee population is approximately 48,300[55] and the residential population is 17,084.[56] The addition of up to five employees is considered nominal considering the City's employee population is approximately 48,300, and the additional employment is not anticipated to result in unplanned population growth in the City. Therefore, no impact would occur in this regard, and no mitigation is required.

4.14b Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. There is no housing on the Project site. Therefore, the Project would not displace existing people or housing, or require construction of replacement housing elsewhere. No impact would occur in this regard, and no mitigation is required.

[54] Email correspondence with Sam Brown, ServerFarm. December 21, 2021.
[55] SCAG. (2020). *Connect SoCal- Demographics and Growth Forecast*. Retrieved from https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.
[56] California Department of Finance. (2022). *E-5 Population and Housing Estimates for Cities, Counties, and the* State, January 2021-2022, with 2020 Benchmark. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/.

4.15 Public Services

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Impact Analysis

4.15a Fire Protection?

Less Than Significant Impact. The City is served by El Segundo Fire Department. There are 14 firefighters on duty at all times. There are two fire stations in the City: Fire Station 1 (314 Main Street) and Fire Station 2 (2261 East Mariposa Avenue).[57] Fire Station 2 is approximately 800 feet northeast of the Project site. Given their scope and nature, the Project's proposed additional generators and employment increase are not anticipated to increase the demand for fire protection services. Diesel transport, fueling, and operations would be subject to compliance with applicable federal, State, and local regulations identified in **Section 4.9: Hazards and Hazardous Materials**. In the event of a fire within a generator, they are located within enclosures, which would in part contain fire. Also, as under existing conditions for the existing data center, fire protection services would continue to be provided to the property. The Project would not require new or physically altered fire protection facilities to maintain acceptable response times, therefore, would not result in adverse physical impacts in this regard. The City has confirmed that a project of this nature would not be subject to developer impact fees.[58] The Project would result in a less than significant impact concerning fire protection services, and no mitigation is required.

4.15b Police Protection?

Less Than Significant Impact. El Segundo Police Department provides police protection services to the City. The Police Department is approximately 1.64-miles southeast of the Project site (348 Main Street). Given their scope and nature, the Project's proposed additional generators and employment increase are not anticipated to increase the demand for police protection services. Also, as under existing conditions for the existing data center, police protection services

[57] El Segundo Fire Department. (Undated). *Operations*. Retrieved from https://www.elsegundofd.org/suppression/operations. Accessed on December 17, 2021.
[58] Email Correspondence with Maria Baldenegro, El Segundo Planning Division. February 1, 2022.

would continue to be provided to the property. The Project would not require new or physically altered police facilities to maintain acceptable response times, therefore, would not result in adverse physical impacts in this regard. The Project would result in a less than significant impact concerning police protection services, and no mitigation is required.

4.15c Schools?

No Impact. As mentioned, the Project would not induce population growth (see **Section 4.14**), thus, would not increase the demand for school services. Given their scope and nature, the Project's proposed generators and employment increase are not anticipated to increase the area's student population. The Project would not require new or physically altered school facilities, therefore, would not result in adverse physical impacts in this regard. The Project would result in no impact concerning school facilities, and no mitigation is required.

4.15d Parks?

No Impact. See Response 4.16 below.

4.15e Other public facilities?

No Impact. The City has one library at 111 West Mariposa Avenue. The Project would not induce population growth, thus, would not increase the demand for public facilities. Given their scope and nature, the Project's proposed additional generators and employment increase are not anticipated to increase the demand for library facilities or resources. The Project would not require new or physically altered library facilities, therefore, would not result in adverse physical impacts in this regard. The Project would result in no impact concerning library facilities, and no mitigation is required.

4.16 Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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?				X
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?				X

Impact Analysis

4.16a 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?

4.16b 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?

No Impact. The recreational facility nearest the Project site is an aquatic center located approximately 350 feet (107 meters) to the southeast. The Project would not induce population growth, thus, is not anticipated to increase the demand for recreational facilities. Given their scope and nature, the Project's proposed additional generators would not increase the use of existing recreational facilities or generate a demand for new recreational facilities. Further, the Project's nominal employment increase is not anticipated to increase the use of existing recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. The Project does not propose or require new or physically altered recreational facilities, therefore, would not result in adverse physical impacts in this regard. No impact would occur, and no mitigation is required.

4.17 Transportation

Environmental Issue	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, bicycles, and pedestrian facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?			X	
d) Result in inadequate emergency access?				X

Impact Analysis

4.17a Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No Impact. Given the proposed Project's scope and nature, the Project does not propose changes to, or increase the demand for the area's circulation system. Additionally, all construction would be within the Project site limits, thus, would not disrupt nearby roadways or site access. Therefore, the Project would not conflict with a program plan, ordinance, or policy addressing the circulation system. The Project would result in no impact in this regard, and no mitigation is required.

4.17b Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Less Than Significant Impact. State CEQA Guidelines §15064.3 codifies the change from level of service to vehicle miles traveled (VMT) as a metric for transportation impact analysis. Pursuant to SB 743, VMT analysis is the primary method for determining CEQA impacts. According to State CEQA Guidelines §15064.3(a), VMT refers to the amount and distance of automobile travel attributable to a project. The City's Draft VMT Guidelines are aligned with the Office of Public Research's (OPR) Technical Advisory. The Draft VMT Guidelines allow screening for non-significant transportation impacts. The purpose of this step is to determine if a presumption of a non-significant transportation impact can be made based on a project's characteristics. Screening for "Small Projects" applies to projects with low trip generation per existing CEQA exemptions. Note that this includes any land use type (residential, office, open space, neighborhood parks, etc.). Projects that generate less than 110 trips per day per the ITE Manual or other acceptable source determined by the City are presumed to cause a less-than-significant transportation impact. The Project would not increase floor area but would increase the onsite jobs by up to five

employees, resulting in approximately 18 average daily trips.[59] Given the Project would generate substantially less than 110 daily trips, the Project is presumed to result in a less than significant transportation impact concerning VMT.

4.17c Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Vehicular access (i.e., left-turn and right-turn ingress/egress turning movements) is currently provided at the two existing property driveways located off of Nash Street. The Project would not alter the site's circulation. The Project does not propose any traffic improvements with potential to increase hazards due to geometric design. The Project proposes to install up to seven additional emergency backup diesel generators at the property's northeast corner to serve the existing data center. The proposed generators would be similar to the eight generators that already exist on the property. Thus, the Project does not propose any improvements with potential to increase hazards due to incompatible uses. The Project would result in a less than significant impact in this regard, and no mitigation is required.

4.17d Would the project result in inadequate emergency access?

No Impact. Primary vehicular access to the Project site is provided via the south driveway off North Nash Street. The northern driveway is gated, however it would continue to be available for use if needed in an emergency. As previously noted, the Project would not affect circulation within or near the Project site as the emergency generators would be installed in areas that would not affect on-site circulation. Therefore, the Project would not result in inadequate emergency access. No impact would occur in this regard, and no mitigation is required.

[59] Based on ITE Trip Generation, 11th Edition. Land Use Code 110 – General Light Industrial, Employees, (3.1 daily trips per employee).

4.18 Tribal Cultural Resources

This Section is based on Assembly Bill 52 (AB 52) communications initiated by the City; see **Appendix B: Assembly Bill 52 Communications**.

Environmental Issue	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 tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, 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				
i) 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 §5020.1(k); or				
ii) 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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

Impact Analysis

4.18ai Cause a substantial adverse change in the significance of a tribal cultural resource, 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 §5020.1(k); or

4.18aii Cause a substantial adverse change in the significance of a tribal cultural resource- 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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation Incorporated. Chapter 532 Statutes of 2014 (i.e., Assembly Bill 52 (AB 52)) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources," which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical

resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource." In compliance with PRC §21080.3.1(b), the City provided formal notification to California Native American tribal representatives identified by the California NAHC. Results of the Sacred Lands File Search conducted with the NAHC were negative, however, Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources, as defined in PRC §21074. The City contacted the tribal representative of the tribe noted below pursuant to AB 52 requirements. Correspondence to and from the tribal representative is included in **Appendix B**.

- **Gabrieleno Band of Mission Indians-Kizh Nation,** Andrew Salas.

Pursuant to AB 52, the City engaged with the Gabrieleno Band of Mission Indians-Kizh Nation in consultation on the Project on June 30, 2022. On May 13, 2022, the Gabrieleno Band of Mission Indians-Kizh Nation responded in writing to the City requesting consultation. Consultation pursuant to AB 52 is deemed complete when:

- Parties reach mutual agreement concerning appropriate measures for preservation or mitigation; or
- Either party, acting in good faith or after reasonable effort, concludes that mutual agreement cannot be reached concerning appropriate measures of preservation or mitigation.

On June 14, 2022, the City submitted a follow-up response to the Kizh Nation, including a draft list of mitigation measures to avoid/lessen potential impacts to tribal cultural resources. After further consultation, on September 21, 2022, the City and Kizh Nation reached a mutual agreement concerning appropriate mitigation measures; see **MM TCR-1**. Therefore, consultation pursuant to AB 52 is deemed complete for the Project.

It is noted, as discussed in Response 4.9b, the Project site has already been subject to extensive disruption and contains artificial fill materials.[60] The Project site is underlain by 4.0 to 6.0 feet of artificial fill[61] and would require excavations of only approximately 3.0 feet below the bottom of generator foundations;[62] thus, no excavations into native soil would occur with the Project. Depth of excavation for the proposed equipment would not exceed 5.0 feet, except at the northwest corner where a drywell would be constructed up to 30 feet deep. Due to the extremely narrow width of excavation required for the drywell (approximately 10.0 feet), the drywell is unlikely to encounter tribal cultural resources. Notwithstanding, the potential exists for the Project to result in a substantial adverse change in the significance of a previously unidentified Native American tribal cultural resource. With implementation of **MMs TCR-1**, **TCR-2**, and **TCR-3**, potential impacts to tribal cultural resources would be less than significant.

[60] Terracon Consultants, Inc. (2021). Geotechnical Engineering Report.
[61] Ibid
[62] Ibid

Mitigation Measures

MM TCR-1: **Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The project applicant shall retain a Native American Monitor ("Monitor") from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground- disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the lead agency City prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency City upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-2: **Unanticipated Discovery of Human Remains and Associated Funerary Objects.** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

If Native American human remains and/or grave goods are discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM TCR-3: **Procedures for Burials and Funerary Remains.** As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that,

as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

4.19 Utilities and Service Systems

Environmental Issue	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 facilities concerning the following, the construction or relocation of which could cause significant environmental effects? i. Water, ii. Wastewater, iii. Wastewater Treatment (see Response 4.19.c below), iv. Stormwater Drainage, v. Electric Power, Natural Gas, and Telecommunications.			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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 projected demand in addition to the provider's existing commitments?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Impact Analysis

4.19a Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects?

i. Water,

Less Than Significant Impact. See Response 4.19b below.

ii. Wastewater,

iii. Wastewater Treatment,

Less Than Significant Impact. See Response 4.19.c below.

iv. Stormwater Drainage,

Less Than Significant Impact. Refer to Response 4.10c concerning drainage patterns and stormwater drainage systems. As discussed in Response 4.10c, the Project proposes onsite drainage improvements. The Project also proposes a drywell at the property's northeast corner to collect and treat stormwater runoff and recharge groundwater to satisfy the City's Low Impact Development (LID) requirements. The environmental effects associated with the proposed onsite drainage improvements are analyzed throughout this Initial Study. The Project would not require or result in the relocation or construction of new or expanded offsite stormwater facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project would result in a less than significant impact in this regard, and no mitigation is required.

i. Electric Power, Natural Gas, and Telecommunications.

Less Than Significant Impact. The City's electrical power is provided by SCE and natural gas is provided by SoCalGas. The City's telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure throughout the City. Refer to Responses 4.6a and 4.6b for further discussions concerning electricity and natural gas usage. The Project proposes to install up to seven emergency backup diesel generators. These seven additional generators would support previously constructed internal electrical/equipment modifications, which would result in increased electrical demand and up to five additional employees. No change in land use or expansion in building floor area is proposed. The Project's estimated operational electrical demand, inclusive of the existing data center operations, would total approximately 16,600,000 kWh per year. This would represent 0.13 percent of the SCE's forecast increased demand in 2026, which would be negligible compared to the SCE service area's overall demand. Additionally, the proposed generators would be diesel and used solely for emergency purposes and during maintenance. On-site connections to existing electrical lines would be required to power the proposed generators. The Project would not generate a demand for natural gas or telecommunications, since the proposed generators would not require these utilities and the additional employees would occupy the existing data center, with no additional floor area proposed. The Project would not require or result in the relocation or construction of new or expanded offsite electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project would result in a less than significant impact in this regard, and no mitigation is required.

4.19b Would the project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. The Golden State Water Company (GSWC) supplies water to the City. GSWC's *Final 2020 Urban Water Management Plan (UWMP)* Tables 5-2 and 5-3 indicate water supplies would meet the service area's water demands for normal, single-dry, and multiple

dry-year conditions through 2045. UWMP water demand forecasts are based on historical water use analysis, population growth, and commercial and residential development.

Assuming a water demand rate of 307 gallons per day (GPD) per employee and up to five additional employees generated by the Project, the Project would generate a water demand of approximately 1,535 GPD. It is anticipated that sufficient water supplies would be available to serve the Project given: the Project would not result in unplanned population growth or additional floor area, with resultant water demands; the proposed additional employees' water demand would be nominal; the proposed generators, which would require a nominal amount of water for cooling, would operate only under emergency conditions or during routine maintenance.

The Project would not require or result in the relocation or construction of new or expanded offsite water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project would result in a less than significant impact in this regard, and no mitigation is required.

4.19c 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 projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The City is within the jurisdictional boundaries of Sanitation Districts of Los Angeles County Sanitation District (LACSD) No. 19.[63] The Project proposes to install generators, which would not generate wastewater or create a demand for wastewater conveyance or treatment. The unit of measure the LACSD uses to calculate wastewater generation is square foot (for various land use types). The Project does not propose any additional floor area, thus, wastewater generation for employees cannot be calculated. However, given the nominal increase in employment (up to five additional employees), the Project is anticipated to generate a proportionately nominal increase in wastewater. Therefore, the Project would not impact LACSD wastewater treatment facility capacity.

The Project would not require or result in the relocation or construction of new or expanded offsite sewer facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project would result in a less than significant impact in this regard, and no mitigation is required.

4.19d 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?

4.19e Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The equipment concrete pads/footings, gravel and base, and stairs that currently occupy the Project site would be demolished and replaced by the proposed

[63] Los Angeles County Sanitation Districts. (2015). *Sanitation District's Service Area*. Retrieved from: https://www.lacsd.org/home/showpublisheddocument/960/637637537988200000.

generators. California's Green Building Standards Code (CALGreen) requires a 65 percent diversion rate for construction and demolition (C&D) projects. The City has adopted the Code through ESMC Title 13, Chapter 1. Thus, the Project would be subject to compliance with CBC §4.408 Construction Waste Reduction, Disposal and Recycling, which would achieve compliance with State law.

The unit of measure typically used to calculate solid waste generation is square foot (for various land use types). The Project does not propose any additional floor area, thus, this methodology is not appropriate. While CalRecycle does identify a solid waste generation rate of 8.93 pounds per employee per day for the industrial sector,[64] this rate is based on 2006 data. Assuming a solid waste generation rate of 8.93 pounds per employee per day and up to five additional employees generated by the Project, the Project employees would generate approximately 45 pounds per day. Given this is a nominal increase in solid waste generation and as under existing conditions, the data center would be subject to any State and City regulations governing recycling, a less than significant impact would occur in this regard, and no mitigation is required.

[64] CalRecycle. 2022. *Waste Characterization*. Retrieved from: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Commercial.

4.20 Wildfire

Environmental Issue	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?				X
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?				X
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?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Impact Analysis

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

4.20a substantially impair an adopted emergency response plan or emergency evacuation plan?

4.20b 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?

4.20c 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?

4.20d expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The CalFire Fire Hazard Severity Zone Map indicates the City is not within a State Responsibility Area or within a very high fire severity zone (VHFSZ).[65] Therefore, the Project would result in no impact concerning wildfires, and no mitigation is required.

[65] CalFire. (2021). *FHSZ Viewer*. https://egis.fire.ca.gov/FHSZ/. Accessed on December 14, 2021.

4.21 Mandatory Findings of Significance

Environmental Issue	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?			X	
b) 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 the past projects, the effects of other current projects, and the effects of probable future projects.)				X
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

Impact Analysis

4.21a 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?

Less Than Significant Impact. As discussed throughout this Initial Study, the Project does not have the potential to degrade the environment's quality or result in significant environmental impacts that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., federal, State, and local regulations) and the recommended mitigation measures.

As concluded in **Section 4.4**, the Project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal.

As concluded in **Section 4.5**, the Project would not eliminate important examples of the major periods of California history.

As concluded in **Section 4.18**, the Project could cause an adverse change in the significance of a tribal cultural resource, unless mitigated. Following compliance with **MM TCR-1**, **MM TCR-2**, and **MM TCR-3**, potential impacts to tribal cultural resources would be reduced to less than significant.

4.21b 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 the past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The proposed Project would result in significant impacts unless mitigated for the following environmental resource areas: air quality, noise and vibration, and tribal cultural resources. The potential impacts associated with air quality and noise would be during the maintenance and testing of the generators. Impact analysis concerning air quality and noise analyzed Project impacts cumulatively with existing generator maintenance and testing, thus, analyzed cumulative impacts concerning air quality and noise. Incorporation of **MM AQ-1** and **NOI-1** would result in no cumulative impacts for air quality or noise. The potential impacts associated with tribal cultural resources are localized, thus, would not result in cumulative impacts. A Mitigation Program has been prepared for each of these environmental resource areas to reduce impacts to less than significant. Other development projects within the City would be subject to the City's discretionary review process, CEQA, and the established regulatory framework, which would be evaluated on a case-by-case basis.

For all other resources areas, the analysis determined the Project would result in either no impact or a less than significant impact following compliance with the established regulatory framework, without the need for mitigation. Due to the Project's massing and scale, and nature as a minor augment to an existing facility, no cumulative impacts would occur.

The City's cumulative project list includes one data center approximately 0.1 mile east of the Project site, at 445 North Douglas Street.[66] Because Project impacts would be less than significant, or less than significant with mitigation incorporated, the proposed Project would not result in any significant impacts that when combined with impacts of the nearby data center would be considered cumulatively considerable; see also Responses 4.3d and 4.8b. Therefore, the proposed Project would not result in any cumulatively considerable impacts, and no mitigation is required.

4.21c Does the project have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly?

Less Than Significant With Mitigation Incorporated. As discussed in the respective sections, the proposed Project would have no potentially significant impacts that would not be reduced to less than significant following compliance with the established regulatory framework and/or recommended mitigation measures. The Project would not cause substantial adverse effects on human beings directly or indirectly with mitigation incorporated concerning air quality and noise. Therefore, with mitigation incorporated, impacts concerning adverse effects on human beings would be less than significant.

[66] City of El Segundo. (undated). *Cumulative Project List.* https://www.elsegundo.org/government/departments/development-services/planning-division/cumulative-projects-list.

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