El Segundo Downtown Specific Plan Update
Draft Environmental Impact Report

State Clearinghouse No. 2023010196

Prepared for:

City of El Segundo
350 Main Street
El Segundo, California 90245

Prepared by:

EcoTierra Consulting, Inc.
633 W. 5th Street, 26th Floor
Los Angeles, California 90071

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Executive Summary

The purpose of the Executive Summary for this Draft Environmental Impact Report (EIR) is to provide a summary of the proposed El Segundo Downtown Specific Plan Update (Project), its environmental consequences, mitigation measures, and alternatives to the Project. Per the requirements of Section 15123 of the State California Environmental Quality Act (CEQA) Guidelines, a summary shall identify:

(1) Each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect (see Section ES.4 and ES.5);

(2) Areas of controversy known to the lead agency including issues raised by agencies and the public (see Section ES.6); and

(3) Issues to be resolved including the choice among alternatives and whether or how to mitigate significant effects (see Section ES.6).

1. Introduction

The purpose of this Draft Environmental Impact Report (EIR) is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the El Segundo Downtown Specific Plan Update (the Project). The Project is located in Downtown El Segundo (Project Site), in the northwest quadrant of the City of El Segundo (City). The Project Site is 43.8 acres. The Project Applicant is the City of El Segundo. A detailed description of the Project is provided in **Section III, Project Description**, of this Draft EIR.

The Project will require certain discretionary approvals by the City and is therefore subject to environmental review requirements under CEQA.[1] The City of El Segundo is the Lead Agency under CEQA for the Project.

As described in Section 15121(a) and 15362 of the *State CEQA Guidelines*,[2] an EIR is an informational document that informs public agency decision-makers and the public of any potential significant environmental effects of a project, identifies possible ways to minimize the significant effects, and describes reasonable alternatives to a project. Thus, the purpose of this EIR is to focus the discussion on those potential environmental effects of the Project that the lead agency has determined could be significant. In addition, where applicable, feasible mitigation measures are recommended that could reduce or avoid the significant environmental impacts of the Project.

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[1] *Public Resources Code Sections 21000-21177.*
[2] *California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387.*

This Draft EIR was prepared in accordance with Section 15151 of the *State CEQA Guidelines*, which defines the standards for EIR adequacy as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

In compliance with CEQA, this Draft EIR has been prepared to analyze the potential environmental impacts that may result from implementation of the Project. This Draft EIR identifies feasible mitigation measures and/or alternatives that would minimize or eliminate the potential significant impacts associated with the Project. This Draft EIR evaluates potential environmental impacts associated with implementation of the Project and provides information regarding short-term, long-term, direct, indirect, and cumulative environmental effects of the Project. The Draft EIR must allow the City, responsible agencies, and other interested parties, to evaluate the environmental impacts of Project implementation and the environmental consequences of Project implementation, thereby enabling them to make informed decisions regarding the requested entitlements. The following is a summary of discretionary actions the City of El Segundo will consider:

- Adoption of the El Segundo Downtown Specific Plan Update.
- Certification of the Draft EIR
- Approval of General Plan Amendments
- Specific Plan Amendments
- Approval of Zone Text Amendments
- Approval of Zone Changes

2. EIR Document Organization

This Draft EIR is organized into 9 sections as follows:

- (Executive Summary): This section describes the environmental review process per CEQA, a summary of the Project description, areas of controversy, issues to be resolved, alternatives to the Project, and environmental impacts and mitigation measures.

- Section I (Introduction): This section introduces the Project, the applicable environmental review procedures, and the organization of the Draft Environmental Impact Report (EIR).

- Section II (Environmental Setting): This section provides an overview of the study area's environmental setting including a description of existing and surrounding land uses, and a list of cumulative projects in the Project area.

- Section III (Project Description): This section provides a complete detailed description of the Project including the Project location, objectives, characteristics, and anticipated public agency actions.

- Section IV (Environmental Impact Analysis): This section is the primary focus of this EIR. Each environmental issue area, which includes, aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gases emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, transportation, tribal culture resources, and utilities and service systems, contains a discussion of existing conditions for the Project area, an assessment and discussion of the significance of impacts associated with the Project, an assessment of cumulative impacts, an identification of mitigation measures (where applicable), and a discussion of level of impact significance after mitigation.

- Section V (Other CEQA Considerations): This section provides a summary of significant and unavoidable impacts of the Project and a discussion of potential growth inducing effects of the Project.

- Section VI (Alternatives to the Proposed Project): This section includes an assessment of a reasonable range of alternatives to the Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the Project and to avoid or substantially lessen any of the significant effects of the Project, including: a No Project Alternative, a Reduced Specific Plan Development Alternative, and an Adopted El Segundo Specific Plan Boundary Alternative.

- Section VII (Preparers of the EIR and Persons Consulted): This section presents a list of City agencies and other agencies and consultant team members that contributed to the preparation of this EIR.

- Section VIII (Acronyms and Abbreviations): This section provides definitions for all of the acronyms and abbreviations used in this EIR.

The environmental impact analyses in this Draft EIR are supported by the following technical appendices:

- Appendix A NOP, Initial Study, NOP Public Comments
    - Appendix A.1 Notice of Preparation
    - Appendix A.2 Initial Study
    - Appendix A.3 NOP Public Comments
- Appendix B El Segundo Downtown Specific Plan Update
- Appendix C Air Quality Study

- Appendix D Cultural Resources
    - Appendix D.1 Historical Report
    - Appendix D.2 Paleontological Resources Letter
    - Appendix D.3 South Coastal Information Center Letter
- Appendix E Energy Calculations
- Appendix F Greenhouse Gas Study
- Appendix G Noise Study
- Appendix H Public Services Agency Letters
- Appendix I Transportation and Traffic
    - Appendix I.1 Transportation Assessment Report
    - Appendix I.2 Local Transportation Assessment Report
- Appendix J AB 52 Consultation Summary Report
- Appendix K Water Supply Assessment

3. Project Description

a) Project Overview

The Project is an update to the adopted El Segundo Downtown Specific Plan, which serves as land use and zoning for properties within the boundaries of the Specific Plan area. The Project would revise existing Specific Plan planning districts, amend General Plan and zoning designations on eight parcels, and include mobility enhancements The Project would include direction for public improvement and streetscape guidelines, private urban form criteria, a list of permitted and conditionally permitted land uses in each district within the Specific Plan area, development standards, mobility and infrastructure improvements, an implementation plan, and administration processes.

The Project proposes amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels from Downton Commercial to Downtown Specific Plan. The Project would also amend the City's zoning map to change the zoning on eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP). The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units.

In addition to land use and zoning changes, the Project would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand

Avenue, which would create potential changes to the number of travel lanes on those streets. The Project would potentially eliminate a portion of an existing truck route that is located on Main Street between El Segundo Boulevard and Grand Avenue; proposes the potential closure of a portion of Richmond Street to vehicles, generally from Franklin Avenue to Grand Avenue to create a permanent pedestrian only street for outdoor dining and gathering; and include buffered bicycle lanes on Main Street and Grand Avenue. The Project would include pedestrian and transit improvements in the Project area, including widened sidewalks. Transit improvements could include bus stop enhancements and potentially new and/or relocated bus stops. Widened sidewalks would also provide expanded outdoor seating and dining areas for area restaurants.

The Project would include modifications to parking standards and strategies and alternatives for on-street parking and two new parking structures at the northwest corner of Grand Avenue and Standard Street and the northeast corner of Richmond and Franklin. Lastly, the 2000 Specific Plan area was previously divided into six districts and the Specific Plan Update would adjust the Specific Plan area into four districts: Main Street, Richmond Street, Grand Avenue, and Civic Center districts.

b) Project Objectives

State CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives for the Project. The objectives assist the City in developing a reasonable range of alternatives to be evaluated in the EIR. The project objectives also aid decision makers in preparing Findings of Fact and a Statement of Overriding Considerations, if necessary. The statement of objectives also is to include the underlying purpose of a project, and may discuss a project's benefits. The Project's specific objectives are as follows:

(1) To provide an Update to the Adopted Downtown Specific Plan that will guide the future development of the Specific Plan area and provides land use and development standards, identifies improvements in the public realm, and provides a plan for infrastructure and public services to accommodate potential development.

(2) To promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing.

(3) To attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers.

(4) To promote a range of housing options with opportunities for all incomes.

(5) To improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.

4. Summary of Project Alternatives

This Draft EIR considers a range of alternatives to the Project to allow for informed decision-making in accordance with *State CEQA Guidelines* Section 15126.6. Alternatives to the Project are identified for the purpose of substantially reducing or avoiding the significant impacts of the Project. One alternative was considered and rejected as being infeasible for the Project (an alternate site).

a) Alternative A – No Project Alternative

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project (*State CEQA Guidelines* Section 15126.6(e)(1)). Pursuant to *State CEQA Guidelines* Section 15126.6(e)(2):

> *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans, and consistent with available infrastructure and community services.*

b) Alternative B – Reduced Specific Plan Development Alternative

The purpose of the Reduced Specific Plan Development Alternative is to potentially avoid or substantially lessen the Project's significant impacts by reducing the overall development as compared to the Project. Under Alternative B, development would be similar to the Project, in that it would include changes to land use designations and zoning that would allow increased development capacity within the Specific Plan area. However, the overall increase in development that could occur within the Specific Plan area under Alternative B would be 25 percent less than that which could occur under the Project. Specifically, Alternative B would allow 97,500 square feet of retail/restaurant space (compared to the Project's 130,000 square feet); 150,000 square feet of general office space (compared to the Project's 200,000); 18,000 square feet of medical office space (compared to the Project's 24,000 square feet); and 225 multi-family residential units (compared to the Project's 300 units).

c) Alternative C – Adopted El Segundo Specific Plan Boundary Alternative

The purpose of the Adopted El Segundo Specific Plan Boundary Alternative is to potentially avoid or substantially lessen the Project's significant impacts by reducing the overall development as compared to the Project. The Project proposes to expand the existing Downtown Specific Plan Area boundaries to include eight parcels in the Grand Avenue area. Amendments to the Land

Use Element of the City's General Plan to change the land use designation on the eight parcels in the Grand Avenue area from Downtown Commercial to Downtown Specific Plan would be required. The Project would also amend the City's zoning map to change the zoning on these eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP). Alternative C would not expand the Specific Plan area to these Grand Avenue parcels and, as a result, the Grand Avenue area would be reduced under Alternative C.

The idea behind the amendments in the Land Use Element of the City's General Plan and zoning is to create allowable densities that are high enough to facilitate market-driven redevelopment and allow for the flexibility to develop desirable land uses. Therefore, under Alternative C, overall development would be reduced when compared to the Project as the Grand Avenue area would not include the eight additional parcels as proposed under the Project.

Similar to the Project, Alternative C would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area. Alternative C would reduce the amount of excavation and hauling of soil as compared to the Project due to less overall development, which would lessen the impacts related to air quality emissions during construction and Project-level noise from construction. Alternative C's other impacts would be either less than or similar to the Project's impacts.

d) Environmentally Superior Alternative

Section 15126.6(e)(2) of the *State CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR, and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

Based on the alternatives analysis and **Table VI-2, Comparison of Project and Alternatives Impacts**, and **Table VI-3, Comparison of Alternatives – Meeting the Project Objectives,** Alternative B, the Reduced Specific Plan Alternative, would be environmentally superior to the Project. Alternative B's aesthetic impacts would be less than those of Alternative C. Alternative B's daily work and household VMT would be less than that of both the Project and Alternative A. Alternative B would also consume less water, generate less wastewater and less solid waste, and result in fewer residents than the Project. Therefore, Alternative B would be the environmentally superior alternative.

5. Areas of Controversy/Issues To Be Resolved

Although the Project would not result in any significant unavoidable impacts, potential areas of controversy and issues may need to be resolved by the City's decision-makers. There were several comments related to other environmental issues provided to the City in response to the NOP. Based on the NOP comment letters provided in **Appendix A.3** of this Draft EIR, issues

known to be of concern included, but were not limited to Tribal Cultural Resources, Historic Preservation, Utilities, Air Quality, closure of restaurant and outdoor dining, habitat and native plants, traffic flow, walk streets, local hires, training of construction workers to mitigate public health risks, landscaping habitat, and solar power and battery backup power for Climate Action Plan.

Refer to **Section I, Introduction**, for a summary of the NOP comment letters, and **Appendix A.3** for a copy of the NOP comment letters.

6. Summary of Environmental Impacts and Mitigation Measures

Table ES-1, Summary of Project Impacts, Project Design Features, and Mitigation Measures, summarizes the Project impacts associated with the construction and operation of the Project, as well as Project design features (indicated as PDF) that would be included as part of the Project. Mitigation measures (indicated as MM) that would reduce or avoid significant impacts, and the level of significance after mitigation are also identified.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
A. AESTHETICS		
Impact (a): Effect on Scenic Vistas The Specific Plan Update in and of itself does not propose or authorize any project or development plan. In general, the purpose of the Specific Plan Update is to provide the opportunity to implement the vision of the community. Future development would be required to adhere to all City design guidelines and standards including the Zoning Ordinance, General Plan policies, and the Specific Plan Update development guidelines. There are no policies or programs in the Specific Plan Update that would directly affect scenic vistas nor any that would degrade the visual character of the City. Therefore, no impacts would occur.	**Impact (a):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** No impact.
Impact (b): Damage to Scenic Resources within Scenic Highways There are no state scenic highways in the vicinity of El Segundo, including the Specific Plan area. Therefore, no impact would occur.	**Impact (b):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** No impact.
Impact (c): Conflict with Zoning / Regulations Governing Scenic Quality The Specific Plan Update would not substantially change the existing development pattern, although it would allow the area to redevelop at a higher intensity of land uses and, despite the increase in intensity, the Specific Plan Update would enhance the visual quality and character of Downtown El Segundo, as the update includes new development standards, design guidelines, and landscaping and streetscape requirements intended to enhance the visual quality of the area. In addition, the Project would be consistent with the goals and policies related to aesthetics in the General Plan. As such, impacts would be less than significant.	**Impact (c):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (c):** Less than significant.

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Impact (d): Light and Glare Light: The Specific Plan Update contains several development standards that ensure the Project would not create a new source of light that could affect nighttime views. In addition, the Project would be required to comply with existing California Building Code regulations pertaining to lighting, as adopted by reference pursuant to Chapter 13-1-1 of the El Segundo Municipal Code (ESMC). The development standards in the California Building Code provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality. Furthermore, the Specific Plan area is urbanized and currently contains sources of light and glare, such as street lights, signs, security lighting in parking lots and along walkways, lighted recreation facilities, and light emitted from the interiors of buildings. Therefore, impacts related to increased light sources would be less than significant. Glare: The Specific Plan Update contains several development standards that ensure the Project would not create a new source of glare that could affect daytime views. In addition, the Specific Plan area is urbanized and currently contains buildings and structures with glass, metal, and polished exterior or roofing materials contribute to local sources of glare. Therefore, impacts related to increased sources of glare would be less than significant.	**Impact (d):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (d):** Less than significant.
B. AIR QUALITY		
Impact (a): Conflict with / Obstruct the Air Quality Plans By implementing transportation and mobility improvements and by focusing dense new retail, commercial, and residential uses within a Priority Growth Area, the Project fits the land use pattern adopted and	**Impact (a):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Less than Significant.

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emphasized by the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and would contribute directly to its goals. The Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS and therefore would not result in emissions that are unaccounted for by the 2022 Air Quality Management Plan (AQMP). Projects that are consistent with the 2020-2045 RTP/SCS are part of the regional solution for meeting the 2022 AQMP's air pollution reduction goals. In this regard, the Project would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. Additionally, pollutant emissions associated with the construction and operations of future projects facilitated by the Downtown Specific Plan Update would not exceed South Coast Air Quality Management District (SCAQMD) regional criteria pollutant criteria, meaning that the SCAQMD would not consider the Project's emissions to exceed or contribute substantially to exceedances of ambient air quality standards and thresholds in the Air Basin. Because Project-related growth would be consistent with 2022 AQMP projections that are themselves based on 2020-2045 RTP/SCS projections, and because pollutant emissions associated with the Project would neither exceed nor substantially contribute to any exceedance of ambient air quality standards and thresholds, the Project would not conflict with or obstruct implementation of the 2022 AQMP. Therefore, impacts would be less than significant.		
Impact (b): Cumulatively Considerable Net Increase of Criteria Pollutants <u>Construction</u>: The Downtown Specific Plan Update would facilitate construction of future development within the Specific Plan area through 2040. The City conservatively	**Impact (b):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** <u>Construction</u>: Less than significant.

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estimates that a maximum 10 percent of buildout allowed under the Project could be under construction in any given year. The exact location and types of development are not known, but projects would likely be concentrated along Main Street and would consist mainly of low-rise or mid-rise buildings. The Project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for volatile organic compound (VOC), Nitrogen Oxides (NO_X), Carbon Monoxide (CO), Sulfur Oxides (SO_X), Particulate Matter (PM_{10} and $PM_{2.5}$). Local emissions also would not exceed SCAQMD localized significance thresholds (LSTs) for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's construction-related emissions impacts on regional and localized air quality would be less than significant. Operation: Three operational scenarios were modeled, each of which assumes full buildout of allowable uses under the Project: 2024, 2030, and 2040. The Project's maximum daily emissions – even under the 2024 scenario – would not exceed SCAQMD's regional significance thresholds NO_X, CO, PM_{10}, and $PM_{2.5}$ or LSTs for NO_X, CO, PM_{10}, and $PM_{2.5}$. The only potential exceedance would be with regard to regional VOC emissions during the 2024 scenario. However, full buildout by 2024 is not a realistic or even feasible scenario. Modeling of full buildout by 2030, also a conservative assumption, shows that VOC emissions would be below the SCAQMD regional threshold. In addition, VOC and all pollutant emissions would decline over time primarily due to declining emissions from the mobile source sector, which can be attributed to factors such as the increasing penetration of newer vehicles with better efficiency and exhaust emission control systems in the statewide fleet, and the increasing share of electric vehicles (EVs) within the statewide fleet. Declines in area		Operation: Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
and energy-related emissions would also be expected to occur as the State transitions away from natural gas appliances and as electricity providers (such as Southern California Edison) transition to 100 percent clean energy, but the effect of these transitions is not accounted for in the California Emissions Estimator Model (CalEEMod) criteria pollutant analysis. Given these considerations, the Project's emissions of criteria pollutants, including VOC, would be below SCAQMD regional thresholds and LSTs and therefore less than significant.		
Impact (c): Exposure of Sensitive Receptors to Substantial Pollutant Concentrations Construction: The primary toxic air contaminants (TAC) that would be generated by construction activities is diesel particulates, which would be emitted from the exhaust pipes of diesel-powered construction vehicles and equipment. Because individual cancer risk is based on exposure to concentrations of TACs over a 30-year period, the likelihood that exposure of individuals to TAC concentrations resultant from the Project's intermittent construction activities would result in significant cancer risks is low. Further, the maximum daily particulates emissions associated with the Project's construction activities, which include exhaust particulates, would not exceed applicable regional thresholds and LSTs. Accordingly, construction-related emissions would not result in health risk impacts and impacts would be less than significant. Operation: The Project does not propose sources of acutely and chronically hazardous TACs, such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. Neither the California Air Resources Board (CARB) nor the SCAQMD identify the types of retail, commercial, office, and	**Impact (c):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (c):** Construction: Less than significant. Operation: Less than significant.

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residential uses proposed by the Project as sources of substantial TAC emissions. As a result, the operations of these uses would not warrant the need for a health risk assessment, and this TAC-related impact would be less than significant. Although the Project would generate traffic that produces and contributes to off-site CO emissions, CO hotspots are rate and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project area; auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet and CO levels in the Project area are well below federal and state standards; and the Project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. Therefore, impacts related to CO hotspots would be less than significant.		
Impact (d): Other Emissions Affecting People (Odors) Land uses associated with odor complaints include agricultural operations, wastewater treatment plans, landfills, food processing facilities, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The Project does not involve such land uses. Therefore, the Project's potential to result in objectionable odors adversely affecting a substantial number of people would be less than significant.	**Impact (d):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (d):** Less than significant.
C. CULTURAL RESOURCES		
Impact (a): Adverse Change in Significance of an Historical Resource In a reconnaissance survey conducted for the Historical Report in 2021, four properties were identified as	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:**	**Impact (a):** Less than significant with mitigation.

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appearing to be individually eligible for listing in the California Register as historical resources and one group of properties as appearing to be collectively eligible for listing in the California Register as a historic district. One individually eligible historical resource, the building at 105 W. Grand Avenue, is located in the Main Street District. The other individually eligible historical resources and historic district are located in the Richmond Street District. Land Use Development Standards: It is possible that increased development activities could involve properties occupied by historical resources and a substantial adverse change in the significance of an historical resource may occur. However, Chapter 7.E, of the Specific Plan (Administration, Design Review Process) requires review and approval of a Discretionary Downtown Design Review (DDR) for new buildings; building alterations; substantial exterior alterations; changes to the size or location of building openings; and outdoor retail uses and outdoor dining. In order to approve a project subject to DDR, the design review must find that the project is consistent with the General Plan objectives and would consider Specific Plan Chapter 2.H, which establishes policies and guidance for preservation of historic resources within the Specific Plan area. With implementation of the existing regulatory framework and the design review procedures set forth in the Specific Plan, any potential impacts to historic resources would be reduced to less than significant. In addition, as applicable, the City can implement **MM CUL-1**, which requires preparation of a project-specific technical report that would evaluate specific impacts and provide mitigation measures as necessary for any proposed project within the Specific Plan. Multimodal Mobility: The proposed public realm - multimodal mobility enhancements would not explicitly	**MM CUL-1:** For properties identified in the Historic Report (**Appendix D.1**) individually as potential historic resources or as contributing to a potential historic district and which are subject to a Downtown Design Review for: a) substantial, permanent exterior alterations to a building, b) additions, or c) demolitions, the applicant shall be required to prepare a Historical Resources Assessment Report (HRAR). The HRAR shall be prepared by a qualified professional who meets the Secretary of the Interior's Professional Qualifications Standards in architectural history or history. The qualified professional shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation. The qualified professional shall review the project for compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). The findings of the qualified professional shall be documented in a Memorandum at the schematic design phase. If the project does not comply with the Standards, the Memorandum shall include recommendations for changing the plans to bring the project into compliance. The purpose of the Memorandum is to ensure that the project complies with the Standards in order to avoid significant adverse impacts to historical resources, such that no further environmental review	

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Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings. Improvements for vehicular circulation may include a reconfiguration of roadways to reduce travel lanes and increase sidewalk widths. Such improvements would not materially impair the continued eligibility of the identified historical resources because their significance is not defined by the streetscape. Likewise, closing a section of Main Street or Richmond Street to vehicles on a temporary or permanent basis would not involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings. New parking structures as identified in the Specific Plan would introduce new visual features to the setting of the potential historic district and would be subject to the DDR process. In addition, Section 2.H.5 sets forth design standards for parking structures intended to ensure compatibility with surrounding areas. Therefore, this component of the Project would have a less than significant impact on historical resources. <u>Placemaking and Beautification</u>: The proposed public realm – placemaking and beautification improvements would not explicitly involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings. Adding gateways, signage, street furnishings, bike racks, bus shelters, and public art; and enhancing landscaping and lighting, etc. would not materially impair the continued eligibility of the identified historical resources because their significance is not defined by the streetscape. Furthermore, the proposed guidelines would be used for the implementation of public projects and development conditions for private projects. They are intended to reinforce the small-town feel, aesthetic quality, safety, and function of the Specific Plan area and would have a	is required. The Memorandum shall be submitted to the City for review and concurrence with the findings and recommendations. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The HRAR shall be submitted to the City for review and concurrence with the findings.	

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Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
positive rather than a negative effect on the identified historical resources. Therefore, this component of the Project would have a less than significant impact on historical resources. Infrastructure and Public Facilities: This component of the Project would not involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings and would not have a significant impact.		
Impact (b): Adverse Change in Significance of an Archaeological Resource The potential of encountering and impacting unknown archaeological resources during Project implementation is low given the level of disturbance from the mid-twentieth century; however, it is always possible that unanticipated discoveries could be encountered during ground-disturbing activities associated with future development in the Project area. If such unanticipated discoveries were encountered, impacts to encountered resources could be potentially significant. However, with implementation of **MM CUL-2**, which includes preparation and implementation of a Worker Environmental Awareness Program (WEAP), all construction personnel will be appropriately informed of required responses to unanticipated cultural resources, should these be encountered. Additionally, **MM CUL-3**, requires that all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find. Thus, potentially significant impacts to archaeological resources would be reduced to less-than-significant levels with mitigation incorporated.	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** **MM CUL-2:** Prior to commencement of construction activities for all phases of future development implementation, the project applicants shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City of El Segundo for review and approval. All construction personnel and monitors shall be presented at the WEAP training prior to the start of construction activities. The WEAP shall be prepared to inform all personnel working on a project about the archaeological sensitivity of the area, to provide specific details on the kinds of archaeological materials that may be identified during construction, to explain the importance of and legal basis for the	**Impact (b):** Less than significant with mitigation.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
	protection of significant archaeological resources, and to outline the actions to be taken in the event of a discovery of cultural resources. The WEAP shall define "tribal cultural resources" and include appropriate management requirements relating to inadvertent discovery of a potential tribal cultural resource. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.	
	MM CUL-3: If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities for a project, the City shall be notified and all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find and determine whether or not additional study is warranted. The archaeologist shall be empowered to temporarily stop or redirect grading activities to allow removal of abundant or large artifacts. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC, Section 21082), the archaeologist	

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
	may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted. The archaeologist shall also be required to curate any discovered specimens in a repository with permanent retrievable storage and submit a written report to the City of El Segundo for review and approval prior to occupancy. Once approved, the final report shall be filed with the South Central Coastal Information Center (SCCIC).	
Impact (c): Disturbance of Human Remains No prehistoric or historic burials were identified within the Project Site as a result of the records searches. Additionally, the Project Site is located within an urbanized area that has been subject to disturbance in the past as a result of multiple construction projects and development. Moreover, the Project is not part of a dedicated cemetery and as such, the likelihood of disturbing human remains is low. Furthermore, mandatory compliance with the notification, work cessation, identification, and appropriate treatment and disposition requirements of Section 7050.5 of the California Health and Safety Code and California PRC Section 5097.98 would ensure that potential impacts to human remains would be less than significant.	**Impact (c):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (c):** Less than significant.
D. ENERGY		
Impact (a): Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources Construction: Consumption of transportation fuel during construction would be temporary in nature, and	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Construction: Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
construction equipment used would be typical of similar-sized construction projects in the region. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and contractors would be required to comply with the California Air Resource Board (CARB)'s In-Use Off-Road Diesel Fueled Fleets Regulation that restricts the idling of heavy-duty diesel motor vehicles and governs the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, per applicable regulatory requirements, future construction projects would be required to comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct development constructed pursuant to the Specific Plan Update. Furthermore, construction schedules and processes are already designed to be efficient in order to avoid excess monetary costs. Operation: Although implementation of the Specific Plan Update would increase energy consumption within the Project area, the anticipated energy demands of future development would be a small fraction of projected demands within the respective service areas and region. In addition, those demands are expected to diminish over time due to increases in efficiency requirements. Specifically, future development in the Specific Plan area would replace existing land uses. Not only would the replacement of existing uses partially offset the total energy demands presented above, but with respect to electrical and natural gas demand, would also result in buildings constructed under more recent building codes and standards that establish more stringent efficiency requirements for modern buildings. Furthermore, with respect to petroleum consumption, the Specific Plan		Operation: Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Update would encourage development of mixed land uses that co-locate residents with population-serving commercial and employment land uses near existing and planned alternative modes of transportation and includes development standards and identifies improvement opportunities to encourage walking, biking, and transit use. Implementation of the Specific Plan Update would serve to reduce overall Citywide vehicle miles traveled (VMT) and Project area VMT per service population. As such, the Specific Plan Update would not result in the wasteful, inefficient, or unnecessary consumption of energy during operation; impacts would be less than significant.		
Impact (b): Conflict with / Obstruction of Energy Plan Although the Project would result in greater net energy consumption than existing conditions, the Project would allow for the redevelopment of older, less-efficient land uses with newer buildings subject to more stringent building efficiency codes and standards. Furthermore, future development within the Specific Plan Update area would receive electricity from Southern California Edison (SCE), which is mandated to comply with SB 100, which establishes an overall state target of 100% clean energy for California by 2045. In addition, future development that would be supported by the Specific Plan Update would be required to be constructed according to the applicable energy efficiency requirements of Title 24 at the time of their permit applications are filed. The Project is a land use plan and would not include regulations related to fuel efficiency or alternative fuel vehicles; however, as previously discussed, implementation of the Specific Plan Update would result in decreases in overall Citywide VMT and Project area VMT per service population. The Specific Plan Update	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
would increase access to transit and promote the use of active transportation modes by allowing increased density and promoting a mix of land uses in close proximity to transit. Implementation of the Specific Plan Update 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.		
E. GEOLOGY AND SOILS		
Impact (a): Substantial Effects Involving: **(i) Fault Rupture**: The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. As such, the potential for surface rupture due to fault displacement beneath the Project area is considered very low. The type of development that would occur under the Project is typical of urban environments and would not involve mining operations, deep excavation into the Earth, or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust that would result in the rupture of a fault. Furthermore, the construction of new buildings and associated infrastructure on the Project Site would not directly or indirectly cause or exacerbate existing fault rupture risks. As a result, impacts related to surface rupture of a known earthquake fault would be less than significant. **(ii) Seismic Ground Shaking**: Numerous local and regional faults are capable of producing moderate to large earthquakes that would cause seismic ground shaking at the Project Site. The closest fault is the Palos Verde Fault, located approximately 3.6 miles to the northwest. Project construction would be completed in accordance with the 2022 California Building Code (CBC). As with all development within the City of El Segundo, development	**Impact (a):** **Project Design Features:** **PDF GEO-1:** Site design-specific geotechnical and engineering reports are required to be prepared by a California-licensed geotechnical engineer, California-certified engineering geologist, and civil engineer with expertise in geotechnical issues registered in the State of California during Project design and prior to Project construction in compliance with the most current City of El Segundo Department of Public Works guidelines. The investigation is required to address the proposed Project foundation and structure design to minimize effects from adverse soil conditions including any liquefiable or otherwise unstable/consolidation-prone soils; bedrock characteristics; subsidence; earthquake ground shaking; slope instability; subsurface gas; groundwater; and/or other geotechnical and engineering geologic hazards. The	**Impact (a):** (i) Less than significant. (ii) Less than significant. (iii) Less than significant. (iv) No impact.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
within the Project Site would be required to comply with the seismic safety requirements of the CBC. Upon Project compliance with the CBC and City policies aimed at minimizing geologic hazards, and the recommendations set forth in the site-specific geotechnical reports required by PDF GEO-1, the Project would not directly or indirectly cause substantial adverse effects involving strong seismic ground shaking, and impacts would be less than significant. **(iii) Seismic Ground Failure / Liquefaction**: The depth to historic high groundwater in the Project vicinity is 40 feet below the ground surface; therefore, the potential for liquefaction to occur beneath the Project Site is considered to be very low. Furthermore, according to the California Geological Survey, the Project area is not located within a potentially liquefiable area. Through compliance with existing regulatory standards, including Chapter 18 of the CBC and all other excavation and grading requirements in the CBC and the ESMC, future development under the proposed Project would not change the soil conditions that would increase the risk to structures or persons from future seismic related ground failure, including liquefaction. As such, impacts would be less than significant. **(iv) Landslides**: According to the California Geological Survey, the Project area is not located within a potential landslide area. Therefore, geologic hazards associated with landslides are not anticipated at the Project Site. Additionally, the Project would not exacerbate the potential for on- or off-site landslides. As such, no impact would occur.	design and construction recommendations will be incorporated into the foundation and structural design of proposed project components, implemented in accordance with the design, and subjected to on-going inspection by the relevant entities/agencies. Prior to Grading Plan approval and issuance of permits, all construction/development plans will be approved by the City for construction of such improvements. All site-specific construction will occur in accordance with the approved plans. **Mitigation Measures:** None required or proposed.	
Impact (b): Soil Erosion	**Impact (b):** **Project Design Features**: See Impact (a).	**Impact (b):** No impact.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Soil erosion or loss of topsoil would generally not occur as the Specific Plan area is primarily built out and does not contain available topsoil, with the exception of minimal landscaped areas adjacent to surface parking lots and buildings. Continued adherence to the standards of the existing CBC and compliance with the National Pollutant Discharge Elimination System permit and Storm Water Pollution Prevention Plan requirements, as well as implementation of best management practices, would limit impacts related to soil erosion. Additionally, all future development would be required to implement Best Management Practices for construction activities as specified by the California Storm Water Best Management Practices Handbook and/or the City's Storm Water best management practices (BMP) Manual. The Project is a revision to the existing El Segundo Downtown Specific Plan; no changes to policies that would result in increased erosion are proposed. As such, no impact would occur.	**Mitigation Measures:** None required or proposed.	
Impact (c): Unstable Geologic Unit or Soil According to the California Geological Survey, the Project area is not located within a potential landslide area. In addition, the depth to historic high groundwater in the Project vicinity is 40 feet below the ground surface; therefore, the potential for liquefaction (and the related phenomenon lateral spreading) to occur beneath the Project Site is very low. In addition, future development proposed within the Specific Plan area must be designed and constructed in accordance with Section J104.2.3, Engineered Grading Requirements, of the CBC and the ESMC. All new building construction, alteration, or rehabilitation must comply with all applicable building and seismic codes of the City. In accordance with Section 1803A of the CBC, geotechnical investigations that includes soil testing,	**Impact (c):** **Project Design Features**: See Impact (a). **Mitigation Measures:** None required or proposed.	**Impact (c):** Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
laboratory testing or engineering calculations to evaluate soil types, soil expansion, depth of groundwater, deep foundations, rock strata, excavation, compacted fill, soil strength, seismic design criteria and other soil characteristics that need to be considered in the structural design and construction of buildings and infrastructure are required prior to approval of development plans. Geotechnical investigations must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations from geotechnical investigations must be incorporated into the design and construction of the Project, as reviewed and approved by the City's Community Development Department. Therefore, future development would not directly or indirectly exacerbate existing conditions related to on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, and impacts would be less than significant.		
Impact (d): Expansive Soil There is a possibility that expansive soils exist beneath the sites of future development within the Specific Plan area. However, excessive settlement from such materials can be addressed through excavation, reinforcement of foundations and slabs, and soil stabilization. Such requirements would be set forth in the subsequent design-level geotechnical investigations prepared in accordance with Section J104.2.3, Engineered Grading Requirements, of the CBC and the ESMC. As such, impacts would be less than significant.	**Impact (d):** **Project Design Features**: See Impact (a). **Mitigation Measures:** None required or proposed.	**Impact (d):** Less than significant.
Impact (e): Septic Tanks The Project area is an urbanized area that is currently connected to sewer lines. No septic tanks or alternative	**Impact (e):** **Project Design Features**: None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (e):** No impact.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
wastewater disposal is proposed. No impacts would occur.		
Impact (f): Paleontological Resources / Unique Geologic Features There are no recorded fossil localities on the Project Site or in the Project area, however, fossil localities do occur nearby from the same sedimentary deposits that occur in the Project area, either at the surface or at depth. Based on the review of scientific literature and geologic mapping, as well as the records search from the Natural History Museum of Los Angeles County (LACM), potentially fossil bearing units are present in the Project area, either at surface or in the subsurface. Any Quaternary Alluvial materials present within the Project Site are considered highly sensitive for supporting paleontological resources. In the event that intact paleontological resources are located on the Project Site, ground-disturbing activities associated with construction of the Project, such as grading during site preparation, excavations for the subterranean uses, and trenching for pipelines or utilities, have the potential to destroy unique paleontological resources and/or sites. However, with incorporation of **MM GEO-1**, construction impacts to paleontological resources would be reduced to a level of less than significant.	**Impact (f):** **Project Design Features**: None required or proposed. **Mitigation Measures:**	**Impact (f):** Less than significant with mitigation.

	MM GEO-1:	For excavations that are greater than 5 feet below the existing ground level or in the event that paleontological materials are found during any grading or excavation activity, a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards shall be retained by the Project applicant/developer prior to the approval of demolition or grading permits. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project for review and approval by the City. The PRIMP shall be consistent with the SVP (2010) guidelines and shall outline requirements for preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the Project Site below a depth of 5 feet below the existing ground surface or depth of documented artificial fill (based on construction plans and/or geotechnical reports), procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. At a minimum, the PRIMP shall require that a qualified paleontologist attend the preconstruction meeting and a qualified paleontological monitor be on-site during all rough grading and other significant ground-disturbing activities (including augering) in previously undisturbed deposits. In the event that paleontological resources (e.g., fossils) are unearthed during	

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
	grading, the PRIMP shall require that a paleontological monitor temporarily halt and/or divert grading activity to allow recovery of paleontological resources.	
F. GREENHOUSE GAS EMISSIONS		
Impact (a): Generation of Greenhouse Gas Emissions and Impact (b): Conflicts with Greenhouse Gas Emissions Reduction Plan / Policy / Regulation Full build-out under the Specific Plan Update would result in 12,773.06 metric tons of Carbon Dioxide equivalent ($MTCO_2e$) of GHG emissions annually, including emissions associated with construction (amortized over 30 years). However, the estimated annual emissions are highly conservative as emissions modeling does not account for reduced energy-related emissions that would result from mandatory compliance with SB 100, the area- and energy-related emission reductions that would occur as California transitions away from natural gas appliances, or the reduction in mobile emissions that would result from EO N-79-200. There is no applicable adopted or accepted numerical threshold of significance for greenhouse gas (GHG) emissions; therefore, consistency with plans, policies, and regulations for GHG emissions reduction serves as the basis for GHG impact determination. The Project would be consistent with 2020-2045 RTP/SCS, 2022 Scoping Plan Update, and City of El Segundo Climate Action Plan efforts and strategies to reduce GHG emissions in accordance with the latest and most stringent AB 1279 and SB 375 targets. As a result, the Project's impacts related to GHG emissions and climate change would be less than significant.	**Impact (a) and Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a) and Impact (b):** Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
G. HAZARDS AND HAZARDOUS MATERIALS		
Impact (a): Routine Transport / Use / Disposal of Hazardous Materials The proposed Specific Plan Update would potentially increase the density of residential, office, medical office, retail, and restaurant uses; however, the occasional use or disposal of hazardous materials generally associated with these types of uses include unused paint, aerosol cans, cleaning agents (solvents), landscaping-related chemicals, and other common cleaning products and household substances. These materials are generally disposed of at non-hazardous Class II and III landfills (along with municipal solid waste). Due to mandatory compliance with the required procedures and guidelines during construction and throughout operation, impacts to the public and the environment associated with future development due to the routine transport, use, and disposal of hazardous materials would be less than significant.	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Less than significant.
Impact (b): Release of Hazardous Materials Construction: Construction of future projects in the Specific Plan area could involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. In addition, the soils in the Specific Plan area may contain contamination. Construction activities involving disturbance of contaminated soils could potentially create a significant hazard for construction workers and adjacent properties through upset or accident conditions. Redevelopment, renovation, and demolition of structures built before 1978 (for lead based paints) and 1989 (for asbestos containing materials) could potentially release asbestos or lead into the atmosphere. However,	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Construction: Less than significant. Operation: Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
compliance with federal, State, and local regulations, would reduce this impact to a less than significant level. Operation: Operation of allowed land uses under the Specific Plan Update would include the use and storage of common hazardous materials similarly used in Project area residences and businesses today, with similar risk of upset or accident conditions that would create health or safety risks. The extent and exposure of individuals to hazardous materials would be limited by the relatively small quantities of these materials that would be stored and used on individual properties and transported along roads throughout the Project area. Although common maintenance products and chemicals may be used in new development projects, these hazardous materials would not pose any greater risk compared to other similar development or to existing conditions. Compliance with warning labels and storage recommendations from individual manufacturers would ensure people in the Project area would not be exposed to unusual or significant risks from hazardous materials. Furthermore, businesses that use, store, or transport large quantities of hazardous materials are required to comply with health and safety, and environmental protection laws and regulations previously described, which require businesses handling or storing certain amounts of hazardous materials to prepare a hazardous materials business plan. In addition, future development in the Project area would be required to conform with applicable environmental review processes and environmental regulations related to hazardous materials storage, use, and transport, which would minimize the potential for the public to be exposed to adverse health or safety effects associated with the accidental release of		

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

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hazardous materials into the environment. Impacts would be less than significant.		
Impact (c): Emission / Handling of Hazardous Materials / Substances / Waste Near Schools El Segundo High School is located approximately 0.08-mile north of the Specific Plan area. El Segundo Middle School is located approximately 0.80-mile east of the Project Site, Richmond Street Elementary is located approximately 200 feet northwest of the Specific Plan Project area, and Center Street Elementary, located at 700 Center Street, is approximately 1.0-mile northeast of the Project Site. Compliance with existing regulations would ensure that schools and the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction and operational activities. Operational activities associated with development under the Project would not involve direct handling or emissions of hazardous material. Additionally, reasonably anticipated development from the Proposed Project in the Project area will foreseeably comply with all applicable local, State, and federal laws and regulations, would regulate, control, or respond to hazardous waste transport, storage, disposal, and clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors. As such, impacts would be less than significant.	**Impact (c):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (c):** Less than significant.
Impact (d): Government Code Section 65762.5 Lists Future development under the Specific Plan Update could occur on sites that have been impacted by known releases of hazardous materials into the soil and/or groundwater. However, any project that involved these	**Impact (d):** **Project Design Features:** None required or proposed. **Mitigation Measures:**	**Impact (d):** Less than significant with mitigation.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
properties would require additional CEQA review and would be evaluated for the impact to the environment from known contamination, based on the nature of the proposed project. Any future activities at the Department of Toxic Substance Control (DTSC)'s EnviroStor Database list sites within Specific Plan Update will be subject to site-specific mitigation protocols administered by DTSC and other jurisdictional agencies in conformance with federal, State, regional, and local regulations. There is also potential for development sites to have been impacted by previously unidentified releases of hazardous materials. Construction and operational activities occurring on such sites, could expose people or adjacent properties to adverse effects. Accordingly, mitigation measure **MM HAZ-1** is proposed and would require preparation of a Phase I Environmental Site Assessment prior to the issuance of a grading permit for any future development under the Specific Plan Update. With incorporation of **MM HAZ-1**, impacts would be less than significant.	**MM HAZ-1:** The following process shall be followed prior to issuance of a grading permit: • A Phase I ESA shall be conducted by a qualified environmental professional in accordance with State standards/guidelines and current professional standards, including the ASTM Standard Practice for Environmental Site Assessments. • If the Phase I ESA identifies a REC and/or if recommended in the Phase I ESA, a Phase II ESA (subsurface investigation) shall be conducted by a qualified environmental professional to determine whether the identified potential sources have resulted in soil, groundwater, or soil vapor contamination exceeding regulatory action levels. • If the Phase II ESA identifies contamination exceeding regulatory action levels, additional assessment, remediation, or corrective action (e.g., removal of contamination, in-situ treatment, soil capping) shall be conducted under the oversight of State and/or local agency officials (as necessary) and in full compliance with applicable State and federal laws and regulations. If remediation is determined to be necessary, the grading permit shall not be issued until the applicable regulatory agency has indicated that further remedial	

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	action is not required by issuing a No Further Action letter or that any remedial action can be implemented in conjunction with excavation and/or grading.	
Impact (e): Airport Safety Hazards / Excessive Noise Three parcels located in the northern end of the Specific Plan area (specifically those parcels located along Main Street south of Mariposa Avenue) are located within the Airport Influence Area (AIA) associated with LAX. The Los Angeles County Airport Land Use Commission (ALUC) reviewed the proposed Specific Plan Update for its potential to result in impacts related to exposure to aircraft noise, land use safety, protection of airport airspace, and overflight annoyance and concluded that "the changes proposed by the Specific Plan Update are of a nature that do not warrant impacts of concern to ALUC." Additionally, pursuant to the development standards included in the Specific Plan Update, future development within the Specific Plan area would be limited to heights ranging from 30 to 60 feet, which would generally not be expected to encroach into the navigable airspace of LAX. Based on the above, the Project would not result in safety hazards or excessive noise related to its proximity to airports and impacts would be less than significant.	**Impact (e):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (e):** Less than significant.
Impact (f): Impairment / Interference with Emergency Response / Evacuation Plan The El Segundo Emergency Operations Plan (EOP), adopted by the City in 2003 and updated in 2019, establishes policies and structures for City government management of emergencies and disasters. Pacific Coast Highway (formerly Sepulveda Boulevard) is a designated	**Impact (f):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (f):** Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
disaster route for the City of El Segundo, which leads to the I-105 evacuation route. Implementation of the Specific Plan Update would not interfere with the City's adopted EOP because projects proposed pursuant to Specific Plan Update regulations would be reviewed to ensure that new development would not create barriers to evacuation plans. Also, both the Fire Department and Police Department would be involved in any plans to reconfigure existing roads and parking to ensure emergency access needs can be met. Furthermore, implementation of the Specific Plan Update, including changes associated with the preferred roadway sections, would not alter travel times along typical routes to the most proximate hospital with an emergency room (Centinela Hospital Medical Center in Inglewood) or interfere with emergency access. Therefore, impacts would be less than significant.		
Impact (g): Loss / Injury / Death Involving Wildland Fires The Specific Plan area is not located in a Very High Fire Hazard Severity Zone. Future development within the Specific Plan area would not be subject to any more wildland fire risk than other development in the City. Therefore, no impacts would occur.	**Impact (g):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (g):** no impact.
H. LAND USE PLANNING		
Impact (a): Physical Division of a Community The physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area. Because the Specific Plan's	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Less than significant.

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Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
proposed street network changes and parking improvements would not physically divide an established community, no impacts would occur.		
Impact (b): Conflict with Land Use Plan, Policy, or Regulation The Project would bring residential development to nearby major employers, including Los Angeles International Airport (LAX), energy/gas/oil and aerospace companies and near the City's "super block" development, which contains a mixture of office and research and development uses, thereby reducing travel demands by developing a mix of residential housing opportunities in proximity to employment centers. For these reasons, the Project would not conflict with the applicable goals in the Regional Transportation Plan/ Sustainable Communities Strategy plan (RTP/SCS) adopted for the purpose of avoiding or mitigating an environmental effect. The Specific Plan was prepared to provide the essential relationship between the policies of the General Plan and actual development of the Specific Plan area. By functioning as a regulatory document, the El Segundo Downtown Specific Plan update provides a means of implementing the City's General Plan. All future development plans and entitlements within the Specific Plan area boundaries must be consistent with the standards set forth in the Specific Plan Update. Therefore, the Project would be consistent with the General Plan. The City of El Segundo Zoning Code (Title 15), in conformance with the General Plan, regulates land use development in the City. In each zone, the zoning regulations specify the permitted and prohibited uses, and the development standards, including setbacks, height, parking, and design standards, among others. When a	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
specific plan is adopted, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and permitting criteria. The Specific Plan is adopted by ordinance and serves as the primary zoning document for the Plan Area. Where the Specific Plan is silent, the relevant sections and requirements of the ESMC zoning regulations shall apply. The development standards would be regulated by the Specific Plan and administered and enforced by the City in accordance with the ESMC. The Specific Plan supersedes any conflicts with ESMC zoning regulations. Therefore, upon approval of the Project, the Project would be consistent with the El Segundo Zoning Code for the purposes of avoiding or mitigating environmental effect.		
I. NOISE		
Impact (a): Increase in Ambient Noise Construction: The City would review individual development proposals for compliance with applicable noise control requirements of El Segundo Municipal Code Section 7-2-10(D), Section 7-2-4C, Section 7-2-13. Compliance with these requirements, as well as the application of project-specific mitigation measures for future projects in the planning area as necessary (e.g., temporary noise barriers for construction near sensitive residential receptors, use of quieter equipment, etc.), would ensure that future development does not expose noise-sensitive receptors to substantial noise increases from construction. As with construction of individual development proposals, construction of transportation and mobility enhancements would be required to comply with applicable noise control	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Construction: Less than significant. Operation: Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
requirements, namely the noise limits established by El Segundo Municipal Code Section 7-2-4, Section 7-2-10(D), and Section 7-2-13, which would ensure that noise-sensitive receptors would be protected against substantial noise increases from related construction activities. Based on the above, construction-related impacts would be less than significant. Operation: The Project would not introduce substantially different uses and accompanying stationary noise sources (e.g., industrial uses, etc.) to the Specific Plan area and the types of commercial, retail, and residential uses that would be facilitated by the Downtown Specific Plan Update and their common stationary noise sources are not associated with substantial noise levels. In addition, future projects and noise from their stationary sources would be subject to review for compliance with the City's applicable noise control requirements. During this time, the City would evaluate conditions specific to the future projects, determine if the stationary noise sources being proposed could result in exceedances of the City's noise standards or other significant effects, and, if necessary, incorporate regulatory compliance measures and project design features to ensure that stationary noise sources do not exceed the standards set forth in ESMC Title 7, Chapter 2.4 when measured on a property. Thus, existing ambient noise conditions at noise-sensitive residential properties would be protected against substantial noise increases. The Project's traffic-related noise levels on surrounding roadways (i.e., noise that would be associated with the Project's vehicle trips only) would be no greater than 57 dBA Leq during the busiest peak hours. Given that existing noise levels within the Specific Plan area exceed 65 dBA CNEL, this demonstrates that noise increases		

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
resulting from Project-related traffic would be nominal – fractions of a decibel and below the 3 dBA CNEL threshold of significance that represents a barely perceptible change (for example, 57 dBA + 65 dBA = 65.6 dBA). Based on the above, operation-related noise impacts would be less than significant.		
Impact (b): Excessive Groundborne Vibration / Noise Construction: Future development would be required to comply with ESMC Section 7-2-10(D), which prohibits construction-related groundborne vibration levels that endanger the public health, welfare, and safety. Compliance with regulatory requirements and project design features, would ensure that future projects do not expose buildings to potentially damaging levels of groundborne vibration or levels capable of causing severe human annoyance. As a result, this impact would be less than significant. Operation: The Project does not propose or allow for the implementation of land uses or improvements that are typically associated with significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operations of the retail, restaurant, office, medical office, and residential uses would not contain such vibration sources. Notwithstanding, ESMC Section 7-2-9 prohibits the generation of groundborne vibration that is perceptible without instruments, which would ensure that future projects would be prohibited from exposing buildings to potentially damaging levels of groundborne vibration or levels capable of causing human annoyance. As a result, this impact would be less than significant.	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Construction: Less than significant. Operation: Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Impact (c): Exposure to Airport Noise Three parcels south of Mariposa Avenue along Main Street within the Specific Plan area are located within the AIA for LAX; however, no portion of the Specific Plan area is located within the airport's 65-A-weighted-decibel (dBA) community noise equivalent level (CNEL) noise contour. The Los Angeles County Airport Land Use Commission has reviewed the proposed Specific Plan Update for potential conflicts with the applicable airport land use plan, including exposure to aircraft noise, and confirmed that the Specific Plan area, including the three parcels located within the AIA for LAX, are located "well south of the existing 65 CNEL-dBA noise contours" and determined that the "proposed changes in the Specific Plan Update are of a nature that do not warrant impacts of concern to ALUC." Therefore, the Project would not expose people or land uses to incompatible noise levels from aircraft arriving at or departing from LAX, and this impact would be less than significant.	**Impact (c):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (c):** Less than significant.
J. POPULATION AND HOUSING		
Impact (a): Population Growth <u>Construction</u>: The proposed Project involves fairly common construction requirements that would not require a highly specialized labor force to permanently relocate from other regions. The different construction activities require specific skill sets for a much shorter duration than the overall construction schedule. Because construction workers would not be needed continuously throughout the period of time anticipated to reach the buildout of the Specific Plan Update, it is reasonable to assume that workers/crews would work in the Specific Plan area on a temporary basis only and, thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Because the	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** <u>Construction</u>: Less than significant. <u>Operation</u>: Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
demand for construction workers would be short-term, and because the Specific Plan area is within an urban metropolitan region with a high diversity of skilled labor, a permanent need for new workers to relocate in order to accommodate the proposed Project's temporary construction workforce is not anticipated. Therefore, impacts related to population growth would be less than significant. Operation: The Specific Plan Update is anticipated to generate an additional 732 residents, 300 housing units, and 1,057 jobs. Although the number of residents the Project is anticipated to generate would exceed the Southern California Association of Governments (SCAG)'s projections, SCAG's projections are low when compared to actual Census counts. Furthermore, implementation of the Specific Plan Update would ensure that this population growth would be accommodated in the City with new infrastructure, transportation and mobility, public facilities, and comprehensive long-term planning. The number of housing units the Project is anticipated to generate would be within SCAG's projections for the City. Furthermore, the increase in housing would assist the City in meeting the mandated Regional housing Needs Assessment (RHNA) and would be consistent and supportive of the City's Housing Element projections for new residential units within the City. The number of jobs anticipated to be created by implementation of the Project would be within the employment increase SCAG anticipates for the City. In addition, the Project would not substantially alter the City's current job-housing ratio.		

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Therefore, the Project would not induce substantial unplanned population growth in the area through the planned increase in population, housing, or employment. Impacts would be less than significant.		
Impact (b): Displacement of People or Housing Development pursuant to the Specific Plan Update would be initiated voluntarily by property owners. The Specific Plan does not contain any provisions authorizing eminent domain of residential properties by either the City or any other jurisdiction. Infrastructure, roadway, open space, and other public improvements proposed under the Specific Plan Update would not require the displacement of housing. The Specific Plan Update would neither require nor encourage the displacement of existing housing. Therefore, impacts would be less than significant.	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Construction: Less than significant. Operation: Less than significant.
K. PUBLIC SERVICES		
1. Fire Protection		
Impact (a): New or Altered Fire Protection Facilities Construction: The implementation of "good housekeeping" procedures by the construction contractors and the work crews would minimize accidental on-site fire hazards. In addition, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. The Project would be required to implement standard best management practices (BMPs) set forth by the City and the Regional Water Quality Control Board (RWQCB), which would ensure that hazardous materials and wastes generated during the construction process are handled, stored, and disposed of properly.	**Impact (a):** **Project Design Features:** **PDF PS-1:** Provide an automatic fire sprinkler system throughout every proposed mid-rise building, installed in accordance with El Segundo Municipal Code Chapter 9 and the currently adopted edition of the NFPA 13. **PDF PS-2:** Provide a manual fire alarm system throughout each building, installed in accordance with El Segundo Municipal Code Chapter 9 and the currently adopted edition of NFPA 72.	**Impact (a):** Construction: Less than significant with mitigation. Operation: Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Furthermore, mitigation measure **MM PS-1** would ensure that impacts on fire service response times and emergency access would not be significantly impacted by construction traffic and/or lane closures. Moreover, construction impacts are temporary in nature and do not cause lasting effects to impact El Segundo Fire Department (ESFD) fire protection services. Accordingly, construction-related impacts on fire protection services would be less than significant with mitigation. Operation: Compliance with applicable regulatory requirements, including ESFD's fire/life safety plan review and fire/life safety inspection, would ensure that adequate fire prevention features would be provided in order to reduce the demand on ESFD facilities and equipment. In addition, in accordance with the fire protection-related programs set forth in the General Plan Public Safety Element, and PDF's, as well as ESFD's continued evaluation of existing fire facilities, Project impacts with regard to ESFD facilities and equipment would be less than significant. Fire flow for future development would comply with the 2022 California Fire Code. The final fire flow required for future development would be established by the ESFD during its review of project plot plan, prior to the issuance of a building permit by the City. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for future development. Therefore, impacts related to fire flow would be less than significant. Because the Project would not result in significant transportation impacts, it would also not affect emergency response times. In addition, conformance to applicable	**Mitigation Measures:** **MM PS-1:** The Project shall implement a Construction Management Plan (CMP) that would include street closure information, a detour plan, haul routes and a staging plan. The CMP would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CMP shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and shall include, but not limited to: prohibition of construction worker parking on nearby residential streets; worker parking would be provided on-site or in designated off-site public parking areas; temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men); scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets; construction-related vehicles shall not park on surrounding public streets; and safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools	

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Fire Code requirements and PDF PS-1 and PS-2 would ensure that impacts to fire protection response times during operation would be less than significant. While the Project is anticipated to increase the number of vehicles on roadways in the Project vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, it is anticipated that the ESFD would be able to respond to emergency calls within the established response time. Therefore, impacts related to emergency access would be less than significant.		
2. Police Protection		
Impact (a): New or Altered Police Protection Facilities Construction: As provided above in **MM PS-1**, project applicants of future projects would implement temporary security measures, including security fencing, lighting, and locked entry to secure sites during construction. Construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. **MM PS-1** would also ensure that adequate and safe access remains available within and near sites during construction activities. Future development would also employ temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** See **MM PS-1** under K. Public Services, 1. Fire Protection.	**Impact (a):** Construction: Less than significant with mitigation. Operation: Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
emergency access to sites and traffic flow are maintained on adjacent rights-of-way. Furthermore, Section 21806 of the California Vehicle Code allows drivers of police emergency vehicles to have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Based on the above analysis, upon implementation of the project design features and compliance with State law, impacts on police protection services during construction would be less than significant with mitigation (**MM PS-1**). Operation: The increase in employees and visitors to the Specific Plan area during operation would not represent a significant change in the officer-per-daytime ratio of the service area. Future development would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. Building and layout design would also include crime prevention features, such as nighttime security lighting and a secure parking structure enclosed within each building. These preventative and proactive security measures would decrease the amount of service calls the ESPD would receive. Additionally, the ESPD would review designs of new development and provide guidance on design features that would minimize the opportunity for crime, which would minimize demand for police protection services. Therefore, Project impacts on police service ratios would be less than significant. Response times would not be substantially affected, given that there would not be significant traffic impacts and		

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
given the availability of alternative routes within the street pattern in the area surrounding the Specific Plan area. In addition, the police have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Furthermore, upon completion of a development within the Specific Plan area, the ESPD would be provided with a diagram of the property, and this diagram would include access routes and any additional information that may facilitate police response to a new development. Therefore, impacts to response times would be less than significant. Future development in the Specific Plan area would be designed and constructed in accordance with ESMC requirements to ensure proper emergency access. Furthermore, increases in traffic would not greatly affect police vehicles for the reasons discussed described above. Therefore, impacts to emergency service would be less than significant.		
3. Schools		
Impact (a): New or Altered School Facilities Construction: It is likely that the skilled workers anticipated to work on development in the Specific Plan area already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout not result in an adverse physical change in the environment. Therefore, construction-related impacts on school services would be less than significant.	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Construction: Less than significant. Operation: Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Operation: Based on existing enrollment and capacity data from ESUSD, none of the schools have adequate capacity to accommodate the new students generated by the Project under existing conditions. However, Education Code Section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under the California Environmental Quality Act (CEQA). Therefore, impacts on schools from operation of the Project would be less than significant.		
4. Parks and Recreation		
Impact (a): New or Altered Parks and Recreational Facilities Daytime employee populations are not typically park users and any usage by employees would be brief and non-intensive, likely occurring during lunch breaks, which would not be expected to increase deterioration of existing parks or require the construction of new or expansion of existing parks. In addition, the anticipated increase in residents that would result from implementation of the Project would not result in a substantial reduction in existing standards of service for parks. Furthermore, the Specific Plan Update includes district-specific development standards for the provision of residential private open space, residential common open space, and residential recreation facilities. Residential development within the Project area would be required to meet or exceed these development standards, which	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
would provide an on-site alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project area while reducing impacts to off-site public parks and recreational facilities. Moreover, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support park improvements as well as fund capital costs for other new and existing infrastructure. Accordingly, impacts to park facilities would be less than significant.		
Impact (b): Physical Deterioration of Parks / Recreational Facilities The Project includes district-specific development standards for the provision of residential private open space, residential common open space, and residential recreation facilities. Residential development within the Project area would be required to meet or exceed these development standards, which would provide an on-site alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project area while reducing impacts to off-site public parks and recreational facilities. Furthermore, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support park improvements as well as fund capital costs for other new and existing infrastructure. As such, impacts on park and recreational facilities would be less than significant.	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Less than significant.
Impact (c): Construction or Expansion of Recreational Facilities While the Project does not propose specific development, the Project includes district-specific development standards for the provision of residential private open	**Impact (c):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (c):** Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
space, residential common open space, and residential recreation facilities for future development that would occur within the Project area. Furthermore, all development, including any proposed open space or recreational facilities would be subject to review and approval by the City as part of the normal plan check for a building permit as required by ESMC Section 13-1-2. This mandatory process is intended to ensure compliance with development requirements, codes, and standards and any future development would be required to revise site plans or incorporate changes required by the City during plan check prior to the issuance of building permits. As such, impacts would be less than significant.		
5. Libraries		
Impact (a): New or Altered Library Facilities It is possible the employees of the Project would use the City's library services; however, even if employees use the library, such usage would not be expected to be of a volume of frequency that would overburden the current facilities. In addition, the anticipated increase in residents that would result from implementation of the Project would not result in the need for new or physically altered library facilities to maintain acceptable performance objectives. Furthermore, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support library improvements as well as fund capital costs for other new and existing infrastructure. As such, impacts would be less than significant.	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Less than significant.
L. TRANSPORTATION		
Impact (a): Conflict with Circulation System Program, Plan, Ordinance, or Policy	**Impact (a):** **Project Design Features:** None required or proposed.	**Impact (a):** No impact.

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Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Programs, plans, ordinances, and policies applicable to this analysis include the SCAG RTP/SCS, the City of El Segundo General Plan Circulation Element, and the South Bay Bicycle Master Plan (BMP). As a land use plan that enables infill development, densification of land uses, and multimodal mobility improvements, the Project would be consistent with the RTP/SCS and would not preclude any of the applicable goals from being realized. The Project would also be consistent with and would not preclude the City's ability to comply with the policies of the General Plan Circulation Element. In addition, the Project would not conflict with any of the prioritized bicycle projects, including bike routes, bike land, bike route, bike path combinations, or bike friendly streets, outlined by the South Bay BMP. As such, the Project would not conflict with the applicable programs, plans, ordinances, and policies addressing the circulation system. No impact would occur.	**Mitigation Measures:** None required or proposed.	
Impact (b): Conflict / Inconsistency with CEQA Guidelines, Section 15064.3, subdivision (b) The vehicle miles traveled per service population (VMT/SP) for the Project transportation analysis zone (TAZ) was calculated to be 24.6 VMT/SP, which would be lower than the 2023 baseline of 26.2 VMT/SP. The total daily Citywide VMT in 2040 is estimated to be 1,716,136 VMT, which would be lower than the 2023 Baseline of 1,739,658 VMT. Accordingly, the Project would not result in a higher VMT/SP than the baseline for residential or office projects and would not result in a net increase in Citywide total daily VMT for retail projects. Therefore, implementation of the Project would not conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant.	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Less than significant.

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Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Impact (c): Geometric Design / Incompatible Use Hazards The Specific Plan Update proposes enhancements to the pedestrian network, bicycle network, roadway sections, vehicular circulation, public transit amenities, parking, and placemaking within the Project Study Area. In general, the enhancements would improve existing pedestrian, cyclist, and transit user comfort and experiences. Furthermore, all enhancements would be designed and constructed to conform to the Federal latest Manual on Uniform Traffic Control Devices (MUTCD) design standards. Therefore, implementation of the Project would not substantially increase hazards due to geometric hazards. In addition, no incompatible uses would be introduced and no existing incompatible uses would be exacerbated by the Project. As such, impacts would be less than significant.	**Impact (c):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (c):** Less than significant.
Impact (d): Inadequate Emergency Access The preferred sections for Main Street and Grand Avenue would both result in a reduction in the number of travel lanes from two lanes in each direction to one lane in each direction. As most streets within and surrounding the Project area consist of one travel lane in each direction, including Mariposa Avenue, Franklin Avenue, and Maple Avenue, this preferred roadway section would not present unusual driving conditions for the area. Furthermore, relatively frequent side-streets, driveways, and alleyways (approximately every 150-460 feet) would continue to provide opportunities for vehicles to pull over and allow the passage of emergency vehicles, despite the reduction in number of travel lanes. Additionally, travel lanes along Main Street would not be divided, which would allow a clear path of travel for emergency vehicles down the roadway centerline once vehicles have pulled to the side. Emergency vehicle preemption, which is a system that	**Impact (d):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (d):** Less than significant.

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provides a green light to emergency vehicles while providing red lights to cross traffic, would be included in vehicular circulation enhancements. In addition, following implementation of the Project's vehicular circulation enhancements, travel time throughout the Project area would be similar as under existing conditions. Furthermore, pursuant to Section 21806 of the California Vehicle Code, drivers of police emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, implementation of the Project would not result in inadequate emergency access. As such, impacts would be less than significant.		
M. TRIBAL CULTURAL RESOURCES		
Impact (ai) and (aii): Change in the Significance of a Tribal Cultural Resource The City commenced tribal notification for this Specific Plan Update Project in accordance with AB 52 on January 12, 2023, via a mailing to five tribal representatives of California Native America tribes. A representative from the Gabrieleño Band of Mission Indians – Kizh Nation was the only tribal representative who responded to the Project notification. Tribal Chairman Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation did not request consultation on the El Segundo Downtown Specific Plan Update; however, consultation between the Department of City Planning staff and the representatives from the Gabrieleño Band of Mission Indians – Kizh Nation was requested to occur for all future projects located within the El Segundo Downtown Specific Plan Update. A letter submitted to the City on January 20, 2023 stated that the Project area is located within their	**Impact (ai) and (aii):** **Project Design Features:** None required or proposed. **Mitigation Measures:** **MM TCR-1:** Prior to issuance of a grading permit for future projects, the future project Applicants shall retain a qualified Native American Monitor (Monitor) from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading and excavation activities within the Project Site. The Monitor shall photo-document the grading and excavation activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations and mappings of the graded areas, soils, and documentation of any identified tribal cultural resources. On-site monitoring	**Impact (ai) and (aii):** Less than significant with mitigation.

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Ancestral territory which may have potential for discoveries of cultural resources. The 1860-1938 Kirkman-Harriman Los Angeles County Historical Map shows the Project Site located near the Old Salt Road trade route, and 6 miles north of the L.A. Salt Works Salt Pond and Indian Village. Based on the records search conducted for the Project, the Project Site is considered sensitive for potential tribal cultural resources. Project grading and excavation activities to depths not previously disturbed may encounter these resources, and thus impacts to TCRs may be potentially significant. With the implementation of Mitigation Measure **MM TCR-1**, which would provide for Native American Monitor during future Project grading and excavation activities, impacts on TCRs would be reduced to a level of less than significant.	shall end when the Project Site grading and excavation activities are completed, or when the Tribal Representatives and Monitor have indicated that the Project Site has a low potential for archaeological resources. If tribal cultural resources are encountered during monitoring, all ground-disturbing activities within 50 feet of the find shall cease and the Monitor shall evaluate the significance of the find, and if significant, recommend a formal treatment plan and appropriate measure(s) to mitigate impacts. Such measure(s) may include avoidance, preservation in place, archaeological data recovery and associated laboratory documentation, or other appropriate measures. The City shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Applicant shall implement all measure(s) that the City determined necessary, appropriate, and feasible. Within 60 days after grading and excavation activities are completed, the Monitor shall prepare and submit a final report to the City and the California Native American Heritage Commission. The report shall include documentation of any recovered tribal cultural resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log	

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Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
	and photo documentation, accompanied by a photo key, to the City.	
N. UTILITIES AND SERVICE SYSTEMS		
1. Water		
Impact (a): Relocation / Construction of Water Facilities Construction: Because construction-related water demand is typically a fraction of operational demand, which is currently capable of meeting existing demand, no new or expanded water facilities are anticipated to be required due to construction of future development. In addition, installation of onsite water facilities to serve future development would be a routine activity that would be coordinated with the West Basin Municipal Water District (WBMWD) prior to installation. As such, impacts would be less than significant. Operation: In accordance with El Segundo Fire Department Regulation H-2-a, design of the Project would include installation of private fire hydrants for buildings or structures where any portion of the building is more than 150 feet from the street or public right-of-way. The location and water pressure available to these hydrants would comply with City requirements and their installation would be conducted in coordination and under the approval of the ESFD. In addition, all water service meters, connections, and devices would be upgraded to current City Water Division standards and all necessary permits and licenses would be obtained. The City of El Segundo Public Works Department requires that plans for such water system upgrades be submitted for review and approval. Further, a Utility Plan showing existing and proposed utility improvements would be submitted to the City of El Segundo Public Works Department for review	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Construction: Less than significant. Operation: Less than significant.

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Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
and approval. These plan checks and consultations would ensure that available water supply and pressure would be sufficient to serve the Project requirements. Therefore, impacts would be less than significant.		
Impact (b): Water Supplies Construction: As required by the City's Water Conservation Ordinance (Ordinance No. 1433), non-potable water would be used for soil compacting and dust control purposes and would represent the majority of the water used during construction. While Project construction activities would create a demand for some non-potable (recycled) water, construction activities would be temporary such that any associated water use would be temporary, and the construction activities requiring water use would not create substantial water demand. Therefore, Project construction activities would generate minimal potable water demand, and would not require water supplies that could not be met by existing City water entitlements and resources. Accordingly, impacts would be less than significant. Operation: A projected total net water demand of 121 AFY is estimated for the Project. Based on water supply projections contained in WBMWD's 2020 Urban Water Management Plan (UWMP), the Project's water demand would represent negligible percentages of total demand and supply available for the WBMWD service area. WBMWD is also projected to improve its supplies and supply reliability by increasing recycled water supplies as well as investing in desalinated ocean water supply and as discussed, surplus supplies are available to meet the increased demands during normal, dry, and multiple dry year scenarios through 2044. Based on the above, the City would be able to meet Project operational water demand while meeting its existing and planned projected	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Construction: Less than significant. Operation: Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
future water demands through at least 2040, and would not require new City water entitlements or resources. Therefore, impacts would be less than significant.		
2. Wastewater		
Impact (a): Relocation / Construction of Wastewater Treatment Facilities Construction: Construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the adjacent sewer infrastructure; however, it is assumed that the waste removed from the portable restrooms would ultimately be emptied within the service boundaries of the Hyperion Water Reclamation Plant (HWRP). Given that the amount of wastewater that would be produced by construction of future development would be less than that produced by operation, which can be adequately handled by existing wastewater facilities (see discussion of operational impacts below), the HWRP would have adequate capacity to treat the waste removed from the portable restrooms as well. Therefore, buildout of the Specific Plan area would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be less than significant. Operation: Total sewage generation for the maximum buildout of the Specific Plan area would be 221,600 gallons per day (gpd) or 0.22 million gallons per day (mgd). New sewer laterals would be proposed for all future development. It is anticipated that the new sewer laterals would connect to several of the existing gravity lines surrounding the Project area. Points of connection would be based on the Public Works Wastewater Division's input and would require a Sewer Connection Permit from the City. Future development would be required to prepare a	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Construction: Less than significant. Operation: Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
sewer study to analyze the impact of proposed development on the existing sewer system and to determine if the system has sufficient capacity to handle the anticipated additional sanitary loads. The City has a wastewater conveyance system capacity of 2.75 mgd and an average yearly flow of 2.66 mgd. The maximum wastewater flow that is anticipated for future development under the Specific Plan Update of 221,600 gpd (0.22 mgd) would represent 24.4 percent of the remaining 0.09 mgd of Citywide wastewater conveyance capacity. Wastewater generated by the Project would be conveyed via the Public Works Wastewater Division's wastewater conveyance system within the Hyperion Sanitary Sewer System to the HWRP for treatment. The remaining available capacities within the Hyperion Sanitary Sewer System and at the HWRP are approximately 236 mgd and 175 mgd, respectively. The Project's maximum wastewater flow of 221,600 gpd (0.22 mgd) would represent approximately 0.09 percent of the current remaining capacities of the Hyperion Sanitary Sewer System and approximately 0.13 percent of the current remaining capacity of the HWRP. The City has an agreement with the City of Los Angeles that permits an average flow of 2.75 mgd of wastewater treatment and disposal capacity in HWRP. The remaining allotted capacity at the HWRP is approximately 1.58 mgd. The maximum wastewater flow that is anticipated for future development under the Specific Plan Update of 221,600 gpd (0.22 mgd) would represent 18.8 percent of the remaining capacity at the HWRP that is allotted to the City.		

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
Based on the above, the Project's maximum wastewater flow would not exceed the capacities of the City's collection or conveyance infrastructure, the Hyperion Sanitary Sewer System's conveyance capacity, the HWRP's treatment capacity, or the City's allotted treatment and disposal capacity at the HWRP. Therefore, operation of the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.		
Impact (b): Wastewater Treatment Capacity Construction: Because the amount of wastewater that would be produced by construction would be less than that which would be produced by operation and because the Hyperion Sanitary Sewer System would have adequate capacity to treat the wastewater that would be produced full buildout of the Specific Plan area, the Hyperion Sanitary Sewer System would also have adequate capacity to treat the wastewater that would be produced by construction. Accordingly, impacts would be less than significant. Operation: Future development would be required to prepare a sewer study to analyze the impact of proposed development on the existing sewer system and to determine if the system has sufficient capacity to handle the anticipated additional sanitary loads. In addition, the maximum buildout of the Specific Plan area would represent nominal percentages of remaining capacities of the Hyperion Sanitary Sewer System and the HWRP. Therefore, there is also ample capacity within the Hyperion Sanitary Sewer System and the HWRP to treat the wastewater projected to be generated during operation. Accordingly, impacts would be less than significant.	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Construction: Less than significant. Operation: Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
3. Solid Waste		
Impact (a): Solid Waste Generation Construction: Due to the temporary nature of construction and required compliance with the City's recycling mandates, the types and amounts of construction anticipated to occur under the Specific Plan Update would not be expected to generate waste in excess of standards. Additionally, based on the daily and total capacities and anticipated operational duration of existing facilities that accept inert waste in the county, construction that would occur under the Project would also not generate waste in excess of the capacity of local infrastructure. Through mandatory compliance with regulatory diversion rates, construction activities would not otherwise impair the attainment of solid waste reduction goals. Therefore, impacts during construction would be less than significant. Operation: Based on the default CalEEMod solid waste generation rates, the proposed Project would generate approximately 2.6 tons of solid waste per day. Due to the types of waste that would be generated within the Project area and required compliance with diversion requirements, operation of redevelopment anticipated to occur under the Specific Plan Update would not be expected to generate waste in excess of standards. Based on the average daily disposal intake and the permitted daily capacity of the existing landfills within Los Angeles County, including the three closest landfills to the Project area, as well as the permitted daily intake of transfer/processing facilities, direct transfer facilities, composting/chipping and grinding facilities, and anaerobic digestion facilities, there would be adequate infrastructure capacity within the county to receive, transfer, process, and/or compost/chip/grind/digest the anticipated amount	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Construction: Less than significant. Operation: Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
of solid waste, including recyclables and green waste, that would be generated under redevelopment associated with the Specific Plan Update, and the Project would not generate solid waste that would exceed the capacity of local infrastructure. Compliance with regulatory standards and requirements with regard to solid waste would be mandatory for all redevelopment that could occur under the Specific Plan Update. Through mandatory compliance with regulatory diversion rates, operational activities associated with redevelopment that would occur within the Project area would not otherwise impair the attainment of solid waste reduction goals. Based on the above, impacts during redevelopment consistent with the Specific Plan Update would be less than significant.		
Impact (b): Compliance with Solid Waste Management and Reduction Statutes / Regulations Statutes and regulations related to the management and reduction of solid waste include AB 939, AB 341, SB 1374, AB 1327, and AB 1826. Future development that would occur under the proposed Project would be required to comply with all applicable local and state regulations related to solid waste. Specifically, construction activities that would occur under the Specific Plan Update would be required to comply with the requirements of the CALGreen code to divert 65 percent of construction and demolition waste. During operation, the types of redevelopment projects that are anticipated to occur under the Specific Plan Update are of a type and size that would be subject to the recyclable diversion requirements of AB 341 and the organic waste diversion requirements of AB 1826. Redevelopment would also be subject to the space	**Impact (b):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (b):** Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
allocation requirements established in ESMC Title 5, Chapters 2 and 5. As such, the Specific Plan Update would not conflict with or inhibit the City's or state's abilities to comply with AB 939, AB 939, AB 341, SB 1374, AB 1327, or AB 1826. In addition, because the waste generation anticipated to occur within the Project area under the Specific Plan Update would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, implementation of the Specific Plan Update would not otherwise impact the attainment of solid waste reduction goals. As such, impacts would be less than significant.		

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
4. Electric Power, Natural Gas, and Telecommunications Infrastructure		
Impact (a): Relocation / Construction of Electric Power, Natural Gas, and Telecommunications Facilities Existing electricity transmission and distribution are adequate to meet current and future demands of land uses within Downtown. SCE routinely plans capacity additions and changes at existing and new facilities as needed to supply area load. Future development's electrical consumption would be part of the total load growth forecast for SCE's service area and would be accounted for in the planned growth of their power system. Existing and planned natural gas supplies and regional distribution pipeline infrastructure would be sufficient to the demand for natural gas that would result from future development under the Specific Plan Update. SoCalGas has confirmed that there are facilities in the area and service would be provided in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual arrangements are made on a project-by-project basis. Telecommunication services are provided by private companies, the selection of which is at the discretion of project applicants and/or their successors on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Any required onsite distribution upgrades or connections to existing infrastructure are anticipated to be limited to lateral connections to development sites and would be	**Impact (a):** **Project Design Features:** None required or proposed. **Mitigation Measures:** None required or proposed.	**Impact (a):** Less than significant.

Table ES-1
Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts Before Mitigation	Mitigation Measures and Project Design Features	Level of Impact After Mitigation
coordinated with appropriate service providers to minimize disruptions to service. Impacts from such construction activities are part of typical site development and would not be substantial based on their temporary and localized nature both onsite and within existing rights-of-way or public easements that have been previously disturbed. Based on the above, the relocation or construction of offsite generation, storage, or regional distribution infrastructure would not be required and the construction of new onsite dry utility facilities and connection to existing local distribution infrastructure would not result in significant environmental effects. Accordingly, impacts would be less than significant.		

I. Introduction

The purpose of this section is to introduce the proposed El Segundo Downtown Specific Plan Update (Project), the applicable environmental review procedures, and the organization of the Draft Environmental Impact Report (EIR).

The Specific Plan Update area (Project area) is located in Downtown El Segundo, in the northwest quadrant of the City, which is approximately 20 miles southwest from downtown Los Angeles. Downtown El Segundo is located southwest of the interchange of Interstate 405 Freeway (I-405) and State Route 90 (Imperial Highway), west of Pacific Coast Highway and north of El Segundo Boulevard. Interstate 105 Freeway (I-105) is north of the Specific Plan area, immediately north of Imperial Highway.

The Project area is approximately 43.8 acres in size. The Project area is irregular in shape with portions extending to Eucalyptus Drive to the east, El Segundo Boulevard to the south, Concord Street to the west, and Mariposa Avenue to the north. Los Angeles International Airport (LAX) is located to the north; the Los Angeles County community of Del Aire and the City of Hawthorne are located to the east; the Cities of Manhattan Beach and Hawthorne are located to the south; and the Hyperion Wastewater Treatment Plant, Dockweiler Beach, and Pacific Ocean are located to the west.

The Project is an update to the adopted El Segundo Downtown Specific Plan, which serves as land use and zoning for properties within the boundaries of the Specific Plan area. The Project would revise existing Specific Plan planning districts, amend General Plan and zoning designations on eight parcels, and include mobility enhancements. The Project would include direction for public improvement and streetscape guidelines, private urban form criteria, a list of permitted and conditionally permitted land uses in each district within the Specific Plan area, development standards, mobility and infrastructure improvements, an implementation plan, and administration processes.

The Project proposes amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels from Downtown Commercial to Downtown Specific Plan. The Project would also amend the City's zoning map to change the zoning on eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP). The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units.

In addition to land use and zoning changes, the Project would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would create potential changes to the number of travel lanes on those streets. The Project would potentially relocate a portion of an existing truck route that is located on Main Street between El Segundo Boulevard and Grand Avenue (pending a future Truck Route Study). The Project also proposes the potential permanent closure of a portion of Richmond Street to vehicles,

generally from Franklin Avenue to Grand Avenue, to create a permanent pedestrian only street for outdoor dining and gathering; and recommends maintaining the existing Class III bike route "sharrows" and/or upgrading them to Class II bike lanes. The Project would include pedestrian and transit improvements in the Project area including widened sidewalks and expanded outdoor seating and dining areas for area restaurants. Transit improvements could include bus stop enhancements such as additional transit shelters, lighting, and furnishings, and could potentially provide expanded bus zones.

The Project would include modifications to parking standards and strategies and alternatives for on-street parking and would potentially provide two new parking structures at the northwest corner of Grand Avenue and Standard Street and the northeast corner of Richmond Street and Franklin Avenue. Lastly, the 2000 Specific Plan area was previously divided into six districts and the Specific Plan Update would adjust the Specific Plan area into four districts: Main Street, Richmond Street, Grand Avenue, and Civic Center districts.

1. CEQA Overview and Purpose of an EIR

The purpose of this Draft EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the El Segundo Downtown Specific Plan Update (Project).

The City of El Segundo (the City) is the Lead Agency under CEQA that is responsible for preparing this Draft EIR. This Draft EIR has been prepared in conformance with CEQA (California Public Resources Code Section 21000 et seq.), and the *State CEQA Guidelines* (California Code of Regulations, Title 14, Section 15000 et seq.). The City is responsible for processing and approving the Project pursuant to CEQA Section 21067. Before, deciding whether to approve or deny the Project, the City will consider the information in this Draft EIR, along with other information that may be presented during the CEQA process, including, without limitation, the Initial Study and the Final EIR. The EIR will be used in connection with all other permits and all other approvals necessary for the construction and operation of the Project.

As described in Section 15121(a) and 15362 of the *State CEQA Guidelines*,[1] an EIR is an informational document that informs public agency decision-makers and the public of any potential significant environmental effects of a project, identifies possible ways to minimize the significant effects, and describes reasonable alternatives to the Project. Thus, the purpose of this Draft EIR is to focus the discussion on those potential environmental effects of the Project that the City, as the Lead Agency, has determined could be significant. In addition, where applicable, feasible mitigation measures are recommended that could reduce or avoid the significant environmental impacts of the Project.

[1] *California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387, website: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act. Accessed March 2023.*

This Draft EIR was prepared in accordance with Section 15151 of the *State CEQA Guidelines*, which defines the standards for EIR adequacy as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

This Draft EIR serves as the environmental document for all actions associated with the Project, analyzing the environmental effects of the Project to the degree of specificity appropriate to the actions by the Project, as required under Section 15146 of the *State CEQA Guidelines*. This is a "Project EIR" as defined by CEQA Guidelines Section 15161. Furthermore, this Draft EIR complies with CEQA Guidelines Section 15064, which addresses the significance determinations of the environmental effects caused by the Project. The analysis in this Draft EIR considers the actions associated with the Project to determine the short-term and long-term effects associated with their implementation. CEQA requires the preparation of an objective, full disclosure document to inform agency decision-makers and the general public of the direct and indirect environmental effects of the proposed action, including mitigation measures and reasonable alternatives that can reduce or avoid any identified significant adverse effects. The analysis also includes approved, under construction, proposed, or reasonably foreseeable projects within the vicinity of the Project (see **Table II-1, List of Related Projects**) that could produce a cumulative impact on the local environment when considered in conjunction with the Project. The list of Related Projects is based on information provided by the City of El Segundo Community Development Department.

2. Purpose of a Specific Plan

California Government Code Section 65450 states that after a general plan has been adopted, a Specific Plan may be prepared for the systematic implementation of the General Plan for all or part of the area covered by the General Plan. The El Segundo Downtown Specific Plan Update was prepared in accordance with the requirements of the California Government Code (Title 7, Division 1, Chapter 3, Article 8, Sections 65450–65457), which allows jurisdictions to adopt specific plans to implement their General Plans. Adoption of a Specific Plan is a legislative act that is conducted in the same manner as a General Plan. The purpose of a Specific Plan is to provide for the orderly development of a property through compliance with site-specific development standards that are consistent with the intent and policies of the General Plan.

Upon adoption of a Specific Plan, it becomes the zoning for the site. The proposed El Segundo Downtown Specific Plan Update would set regulations that govern the allowable land uses, development density, and development standards for future development projects, in place of the City's zoning regulations. However, regulations and standards in the City's zoning regulations that

are not covered by the El Segundo Downtown Specific Plan Update would continue to be applicable to future development.

3. Organization of this EIR

This Draft EIR is organized into 9 sections as follows:

- (Executive Summary): This section describes the environmental review process per CEQA, a summary of the Project description, areas of controversy, issues to be resolved, alternatives to the Project, and environmental impacts and mitigation measures.

- Section I (Introduction): This section introduces the Project, the applicable environmental review procedures, and the organization of the Draft Environmental Impact Report (EIR).

- Section II (Environmental Setting): This section provides an overview of the study area's environmental setting including a description of existing and surrounding land uses, and a list of cumulative projects in the Project area.

- Section III (Project Description): This section provides a complete detailed description of the Project including the Project location, objectives, characteristics, and anticipated public agency actions.

- Section IV (Environmental Impact Analysis): This section is the primary focus of this EIR. Each environmental issue area, which includes, aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gases emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, transportation, tribal culture resources, and utilities and service systems, contains a discussion of existing conditions for the Project area, an assessment and discussion of the significance of impacts associated with the Project, an assessment of cumulative impacts, an identification of mitigation measures (where applicable), and a discussion of level of impact significance after mitigation.

- Section V (Other CEQA Considerations): This section provides a summary of significant and unavoidable impacts of the Project and a discussion of potential growth inducing effects of the Project.

- Section VI (Alternatives to the Proposed Project): This section includes an assessment of a reasonable range of alternatives to the Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the Project and to avoid or substantially lessen any of the significant effects of the Project, including: a No Project Alternative, a Reduced Specific Plan Development Alternative, and an Adopted El Segundo Specific Plan Boundary Alternative.

- Section VII (Preparers of the EIR and Persons Consulted): This section presents a list of City agencies and other agencies and consultant team members that contributed to the preparation of this EIR.

- Section VIII (Acronyms and Abbreviations): This section provides definitions for all of the acronyms and abbreviations used in this EIR.

The environmental impact analyses in this Draft EIR are supported by the following technical appendices:

- Appendix A NOP, Initial Study, NOP Public Comments
    - Appendix A.1 Notice of Preparation
    - Appendix A.2 Initial Study
    - Appendix A.3 NOP Public Comments
- Appendix B El Segundo Downtown Specific Plan Update
- Appendix C Air Quality Study
- Appendix D Cultural Resources
    - Appendix D.1 Historical Report
    - Appendix D.2 Paleontological Resources Letter
    - Appendix D.3 South Coastal Information Center Letter
- Appendix E Energy Calculations
- Appendix F Greenhouse Gas Study
- Appendix G Noise Study
- Appendix H Public Services Agency Letters
- Appendix I Transportation and Traffic
    - Appendix I.1 Transportation Assessment Report
    - Appendix I.2 Local Transportation Assessment Report
- Appendix J AB 52 Consultation Summary Report
- Appendix K Water Supply Assessment

4. Lead Agency and Responsible Agencies

a) City of El Segundo

Section 15051 of the *State CEQA Guidelines* identifies the lead agency as the public entity with the greatest responsibility for carrying out or approving a project as a whole. The City is serving as the Lead Agency under CEQA and is responsible for complying with CEQA, as it relates to the environmental review clearance for the El Segundo Downtown Specific Plan Update Project.

The City, as the Lead Agency, has determined that an EIR is required for the proposed Project and has authorized the preparation of this Draft EIR. The City will be reviewing and considering the findings of this EIR in its decision to approve, revise, or deny the proposed Project, as well as actions that it may need to achieve consistency between the El Segundo Downtown Specific Plan Update and the City's General Plan, including a change in the Land Use Plan designation of the Specific Plan area to Downtown Specific Plan. If adopted, the El Segundo Downtown Specific Plan Update will also require Zone Changes to allow the proposed Specific Plan Update to regulate future development within the Plan area, among other discretionary actions described in **Section III, Project Description**, of this Draft EIR.

Although this Draft EIR was prepared with consultant support, the analysis and findings in this document have been independently reviewed by the City and reflect the City's conclusions, as required by Section 15084 of the *State CEQA Guidelines*. The following is a summary of discretionary actions the City of El Segundo will consider:

- Adoption of the El Segundo Downtown Specific Plan Update
- Certification of the Draft EIR
- Approval of General Plan Amendments
- Approval of Zone Text Amendments
- Approval of Zone Changes

b) Responsible Agencies

State law requires that all EIRs be reviewed by trustee and responsible agencies. A "Trustee Agency" is defined in Section 15386 of the *State CEQA Guidelines* as "a state agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the State of California." Per Section 15381 of the *State CEQA Guidelines*, "the term 'Responsible Agency' includes all public agencies other than the lead agency which have discretionary approval power."

In accordance with Section 21081 of CEQA and Section 15091 of the *State CEQA Guidelines*, public agencies are required to make written findings for each environmental impact identified in the EIR. If the lead agency and responsible agencies decide that the benefits of the Specific Plan

outweigh any identified unmitigated significant environmental effects, they will be required to adopt a Statement of Overriding Considerations supporting their actions.

5. EIR Scoping Process

a) Notice of Preparation

Pursuant to Section 15082 of the *State CEQA Guidelines*, the City circulated a NOP to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on January 12, 2023 for a 30-day review period, which ended on February 13, 2023. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the Project and to solicit comments from agencies and the public regarding the scope and content of the environmental information to be included in the Draft EIR. Comments received in response to the NOP and Scoping Meeting have been taken into consideration in the preparation of the Draft EIR. A copy of the NOP is provided in **Appendix A.1** of this Draft EIR.

b) Scoping Meeting

A Scoping Meeting was held on February 2, 2023, from 5:30 p.m. to 7:00 p.m. at the City Hall Council Chambers, 350 Main Street, El Segundo, California 90245. The meeting allowed interested individuals, groups, and public agencies an opportunity to provide written and oral comments to the Lead Agency regarding the scope and focus of the Draft EIR.

Table I-1, Summary of NOP Comments, is a matrix of organizations/persons that provided written comments on the NOP to the City of El Segundo Community Development Department Planning Division, which also indicates the issue areas on which each organization/person commented. A summary of the written comments received in response to the NOP follows:

1. **Native American Heritage Commission:** Per the Native American Heritage Commission (NAHC) letter, the Project is subject to AB 52. NAHC recommends consultation with California Native American tribes that are affiliated with the geographic area of the Project.

2. **Los Angeles Conservancy:** The Los Angeles Conservancy letter recommends an update to the 2014 historic resources survey and historic context statement as part of the Project. In addition, the letter recommends the incorporation of stronger historic preservation language that promotes historic preservation into the DSP Update. Furthermore, the letter recommends the creation of a legacy business program.

3. **Los Angeles County Sanitation Districts:** The Los Angeles County Sanitation Districts letter discusses Utilities and Services Systems. The letter states wastewater would be treated at the City of Los Angeles Hyperion Treatment System.

4. **South Coast Air Quality Management District**: The South Coast Air Quality Management District letter recommends the CEQA Air Quality Analysis utilize the Air Quality Handbook, and that the Project identify any adverse air quality impacts and utilize all feasible mitigation to reduce impacts.

5. **Neil Cadman**: Neil Cadman's letter states that he is the owner of the building on the block of 200 Richmond Street. He opposes the permanent closure of Richmond Street for outdoor restaurant dining without a thorough review of a plan that outlines fairness in terms of square footage and the impact on businesses' parking.

6. **Monica Davis**: Monica Davis's letter states that she is one of the representatives of the Blue Butterfly Conservancy. She requests the Downtown Specific Plan include a specific habitat and native plants to support the Blue Butterfly. She is also concerned about Franklin Street traffic flow patterns and stop sign issues.

7. **Angela Edwards:** Angela Edwards's letter states she Is a home owner/resident of El Segundo and requests the commission include a walk street, and keep the walk street on Richmond.

8. **Anthony Edwards:** Anthony Edwards's letter states he is a resident of El Segundo and requests the commission to include a walk street, and keep the walk street on Richmond.

9. **Nadine Currimjee-Quane:** Nadine Currimjee-Quane's letter request the creation of regenerative green corridors with diverse native plants that adapt to local conditions.

10. **Mitchell M. Tsai:** Mitchell M. Tsai's letter is on behalf of Southwest Mountain States Regional Council of Carpenters Labor Union. The City should require the Project to be built using local workers from the Joint Labor-Management Apprentice Program. The letter also requests the use of local hires which would result in a decrease in worker trip length, which reduces GHG emissions. The use of local hires would also reduce VMT impacts. The letter further requests training for construction workers to mitigate public health risks including temperature screening at project sites during construction.

11. **Corrie Zupo:** Corrie Zupo's letter requests the incorporation of sea-cliff buckwheat plants into landscaping design for food for El Segundo Blue Butterfly's. In addition, the letter requests installation of signage for native habitat. Furthermore, the letter requests the consideration of the use of solar and battery backup power or zero emission or ultra-low emission option to reduce our carbon footprint as needed under the Climate Action Plan.

Table I-1
Summary of NOP Comments

SUMMARY OF COMMENTS		Subject and Draft EIR Section																	
	Letter Number	III. Project Description	IV.A. Aesthetics	IV.B. Air Quality	IV.C. Cultural Resources	IV.D. Energy	IV.E. Geology and Soils	IV.F. Greenhouse Gas Emissions	IV.G. Hazards and Hazardous Materials	IV.H. Land Use and Planning	IV.I. Noise	IV.J. Population and Housing	IV.K. Public Services	IV.L. Transportation	IV.M. Tribal Cultural Resources	IV.N. Utilities and Service Systems	V. Other CEQA Considerations	VI. Alternatives to the Project	Other	Explanation of "Other"
State Agencies and Departments																				
Native American Heritage Commission	1.														•					
City of El Segundo and County of Los Angeles Officials, Agencies & Departments																				
Los Angeles Conservancy	2.				•														•	Update the historic resources survey and historic context statement. Incorporate stronger historic preservation language. Create a legacy business program.

Los Angeles County Sanitation Districts	3.														●				
South Coast Air Quality Management District	4.				●														
Organizations and Individuals																			
Neil Cadman	5.																	●	Opposed to permanent closing of Richmond Street for outdoor restaurant dining.
Monica Davis	6.													●				●	Include a specific habitat and native plants to support the Blue Butterfly in Downtown Specific Plan. Franklin Street traffic flow pattern concerns.
Angela Edwards	7.																	●	Keep walk street
Anthony Edwards	8.																	●	Keep walk street
Nadine Currimjee-Quane	9.	●																	Create regenerative green corridors with diverse native plants that adapt to local conditions.

Mitchell M. Tsai	10.							●						●					●	Letter on behalf of Southwest Mountain States Regional Council of Carpenters Labor Union. Joint Labor-Management Apprentice Program. Hire locally to reduce GHG and VMT. Training for construction workers to mitigate public health risks including temperature screening at project sites during construction
Corrie Zupo	11.	●																	●	Incorporate sea-cliff buckwheat plants into landscaping design. Native habitat signage. Zero emission or ultra low emission solar and battery backup power.

c) Initial Study

The Initial Study, is included in **Appendix A.2** of this Draft EIR. The Initial Study evaluated each potential environmental effect of the Project in accordance with the Environmental Impact Questions included in Appendix G of the *State CEQA Guidelines.*

The Initial Study concluded that the Project may result in potentially significant impacts associated with several environmental issues and therefore, would require further evaluation in an EIR. The Initial Study analyses are based on the Appendix G questions that were in effect and therefore used by the City at the time the Project's NOP was distributed on January 12, 2023. Based on the Initial Study, this Draft EIR includes analyses of the following environmental impact areas:

- Aesthetics,
- Air Quality,
- Cultural Resources,
- Energy,
- Geology and Soils,
- Greenhouse Gas Emissions,
- Hazards and Hazardous Materials,
- Land Use and Planning,
- Noise,
- Population and Housing,
- Public Services,
- Transportation,
- Tribal Cultural Resources; and
- Utilities and Service Systems.

Based on the Initial Study, issues for which no significant impacts are anticipated as a result of project implementation include: Agriculture and Forestry Resources; Biological Resources; Hydrology and Water Quality; Mineral Resources; and Wildfire. Nevertheless, these topics are briefly discussed in **Section V, Other CEQA Considerations**, of this Draft EIR.

6. Public Review Process

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 calendar days. All comments or questions about the Draft EIR should be addressed to the following:

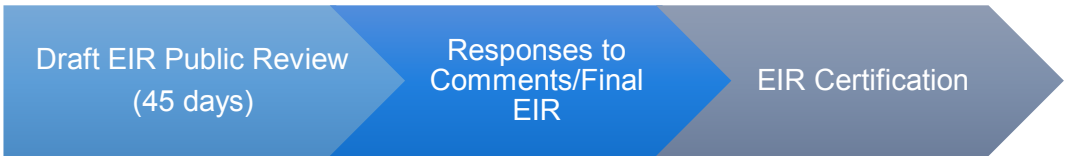
Paul Samaras, Principal Planner, AICP
City of El Segundo
Community Development Department
350 Main Street
El Segundo, CA 90245
psamaras@elsegundo.org

a) Mitigation Monitoring Procedures

State CEQA Guidelines Section 15097 requires that the mitigation measures and revisions to the proposed Project identified in the EIR are implemented. Therefore, CEQA requires that the lead agency must adopt a program for monitoring or reporting on the required revisions and the measures it has imposed to mitigate or avoid significant environmental effects. The Mitigation Monitoring and Reporting Program for the Project will be completed as part of the Final EIR, prior to consideration of the Project by the City of El Segundo Planning Commission and City Council.

b) Final EIR

Upon the close of the public review period, the City will proceed to evaluate and prepare responses to all relevant oral and written comments received from public agencies and other interested parties during the public review period, and prepare a Final EIR. In compliance with Section 15132 of the *State CEQA Guidelines*, the Final EIR will consist of: (1) the Draft EIR or a possible revision of it; (2) comments received on the Draft EIR during the public circulation period; (3) a list of persons, organizations, and public agencies that commented; (4) City responses to significant environmental points raised in the review process; and (5) any other information added by the Lead Agency. Pursuant to Public Resources Code Section 21092.5 and *State CEQA Guidelines* Section 15088(b), the City shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the EIR.



7. Incorporate by Reference

In accordance with Section 15150 of the *State CEQA Guidelines*, an EIR may incorporate by reference all or portions of another publicly available document. Where all or a part of another document is incorporated by reference, the incorporated language is considered to be included in the EIR. The following documents are incorporated by reference into this Draft EIR and are available to be viewed online:

City of El Segundo General Plan: The General Plan serves as a blueprint for future growth and development within the City of El Segundo, prescribing policy goals and objectives to shape and guide the development of the City. It serves as a comprehensive policy document that informs future land use decisions, establishes land use designations and policies that identify a range of zoning options that can be applied to property and assists decision makers as they review planning applications for new projects or consider proposals for ordinances or policies. The General Plan is made up of 10 elements: Economic Development, Land Use, Circulation, Housing, Open Space and Recreation, Conservation, Air Quality, Noise, Safety, and Hazardous Materials and Waste Management. These elements provide the City's foundation guide for planning and identify how land should be used and resources allocated. It is the vision for how the City will evolve and reflects the values and priorities of the community. Electronic files of the City of El Segundo General Plan are available online for review and download at https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan.

City of El Segundo Municipal Code: The City of El Segundo Building Safety Division checks proposed projects and plans for compliance with the 2022 California Building Code. On November 15, 2022, the El Segundo City Council adopted ordinances that adopted the following codes and regulations, which are applicable to development under the proposed Project:

- 2022 California Building Code (Volume I and II) with amendments
- 2022 California Residential Code (with amendments)
- 2022 California Electrical Code
- 2022 Mechanical Code (with amendments)
- 2022 Plumbing Code (with amendments)
- 2022 Energy Code (TITLE 24)
- 2021 International Property Maintenance Code (with amendments)
- 2021 International Swimming Pool and Spa Code (with amendments)

- 2022 California Fire Code (with amendments)
- 2022 California Existing Building Code (with amendments)
- 2022 California Green Building Standards Code (with amendments)
- Earthquake Hazard Reduction Ordinance (with amendments)
- 2021 Uniform Solar Energy and Hydronics Code

Electronic files of the City of El Segundo Municipal Code are available online for review and download at https://codelibrary.amlegal.com/codes/elsegundoca/latest/elsegundo_ca/0-0-0-1.

II. Environmental Setting

1. Introduction

Section 15125 of the *State CEQA Guidelines* requires that an EIR include a description of the existing environment. This section of the Draft EIR provides a general overview of the existing regional and local environmental setting in which the Project Site is located, and a brief description of the existing conditions at the Project Site. Detailed environmental setting information is provided in each of the environmental issues studied in **Section IV, Environmental Impact Analysis** of this Draft EIR. This section also provides an overview of related projects that are considered in evaluating cumulative impacts.

2. Project Location

a) Regional Location

The City of El Segundo (City) is located in Los Angeles County approximately 20 miles from downtown Los Angeles. The City is considered part of the South Bay subregion of the greater Los Angeles metropolitan area. The City is 5.46 square miles (3,494.4 acres).[1] Los Angeles International Airport (LAX) in the City of Los Angeles is located immediately north of the City. The Los Angeles residential areas of Playa del Rey and Westchester are located just north of LAX. To the east of the City is the Los Angeles County community of Del Aire, as well as the City of Hawthorne. The City of Manhattan Beach and Hawthorne are located to the south of the City, and the Pacific Ocean and Dockweiler State Beach are located to the west of the City.

The City of Los Angeles operates two facilities within the coastal area: the Hyperion Water Reclamation Plant, which is an approximately 144-acre wastewater/sewage treatment facility in Los Angeles County, and the Los Angeles Department of Water and Power Scattergood Generating Station, which is an approximately 55-acre natural gas steam turbine power plant. A 0.8-mile stretch of coastline is within the El Segundo City limits, and a portion of the approximately 1,000-acre Chevron El Segundo oil refinery is also located along this stretch of shoreline.

Pacific Coast Highway (PCH) is a California Department of Transportation facility, also known as State Route 1 and Sepulveda Boulevard. PCH connects the coastal cities of Los Angeles County to other coastal communities in northern and southern California. The Project Site is located in the northwest portion of the City.

Downtown El Segundo is located southwest of the interchange of Interstate 405 Freeway (I-405) and State Route 90 (Imperial Highway), west of Pacific Coast Highway and north of El Segundo

[1] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed March 2023.*

Boulevard. Interstate 105 Freeway (I-105) is north of the Specific Plan area, immediately north of Imperial Highway.

b) Local Setting

The Specific Plan Update area (Project area) is located in Downtown El Segundo, in the northwest quadrant of the City. The Project area is approximately 43.8 acres in size. The Project area is irregular in shape with portions extending to Eucalyptus Drive to the east, El Segundo Boulevard to the south, Concord Street to the west, and Mariposa Avenue to the north. The Project area location is shown in **Figure II-1, Regional Location Map** and **Figure III-1, Specific Plan Update Project Boundary** in **Section III, Project Description.**

c) Surrounding Land Uses

Existing surrounding land uses are generally residential in nature, ranging from one- to three-stories in height in a fully developed urban environment, as shown **in Figures II-2 through II-4, Views of Surrounding Uses**.

(1) North

Land uses to the north include El Segundo High School campus, El Segundo Library, and Library Park located on Main Street. Neighborhoods surrounding these civic uses are comprised mainly of single-family dwellings, duplexes, and apartment complexes.

(2) West

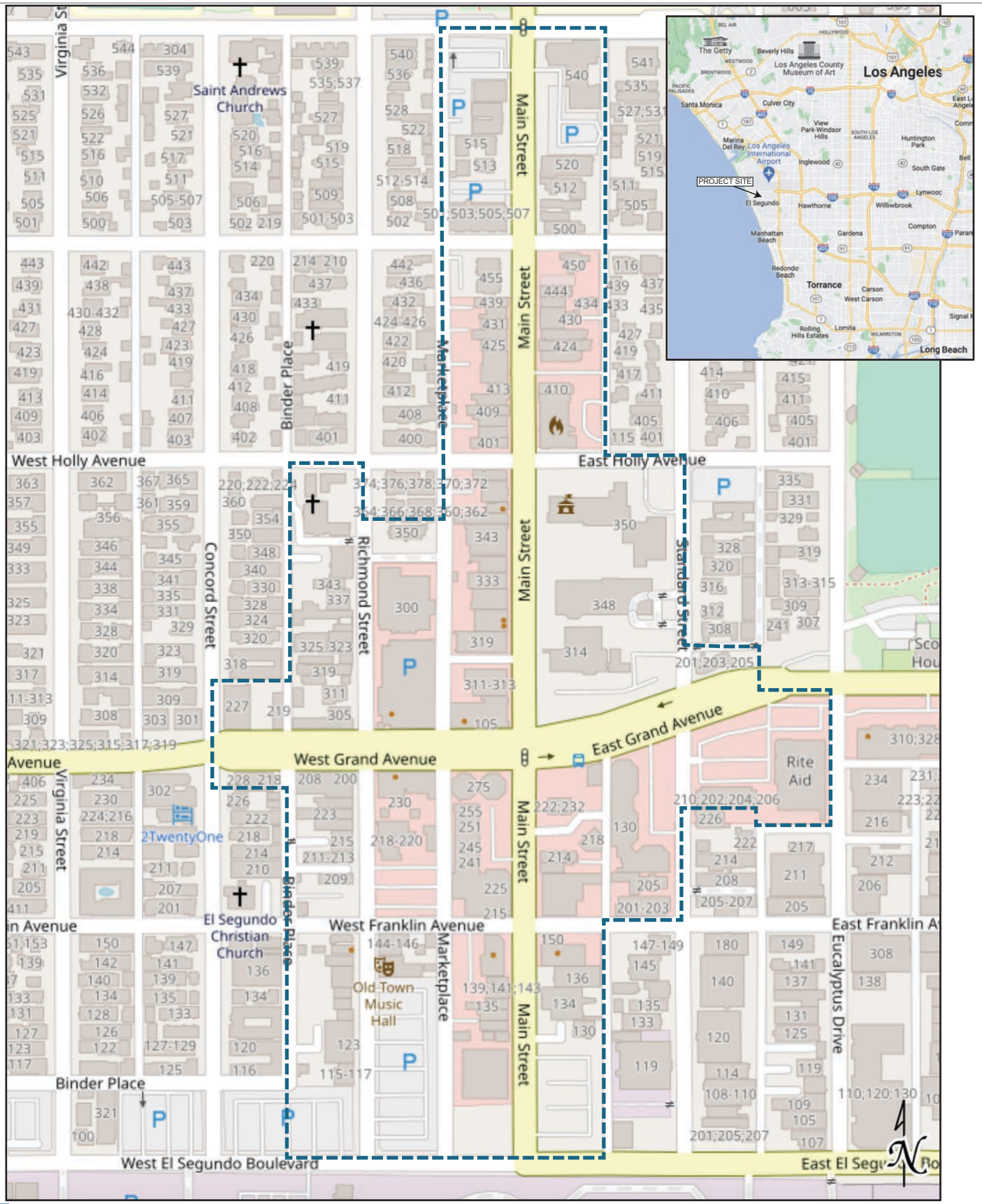
Land uses to west are zoned as Neighborhood Commercial (C-2) along Grand Avenue, Multi-Family Residential (R-3), and Two-Family Residential (R-2). Less than a mile from the western edge of the Specific Plan is the Pacific Ocean. The neighborhoods between Downtown El Segundo and the coast are comprised mainly of single-family dwellings, duplexes, and apartment complexes.

(3) South

The Chevron Refinery is south of El Segundo Boulevard. The Chevron Refinery is zoned Heavy Industrial (M-2) and covers over 1,000 acres of land.

(4) East

Neighborhoods to the east are comprised of a mix of single-family dwellings, duplexes, and apartment complexes. Areas southeast of the Project area contain the Smoky Hollow Specific Plan area and are developed with light industrial and office uses. El Segundo Recreation Park, located along Pine Avenue and Eucalyptus Drive, provides recreational facilities for a range of sports, including softball, roller hockey, tennis, and basketball.



Project Area

Source: OpenStreetMaps and Google Maps, December 2022.

Figure II-1
Regional Location Map

View 1: El Segundo High School to the northeast of the Project Site.

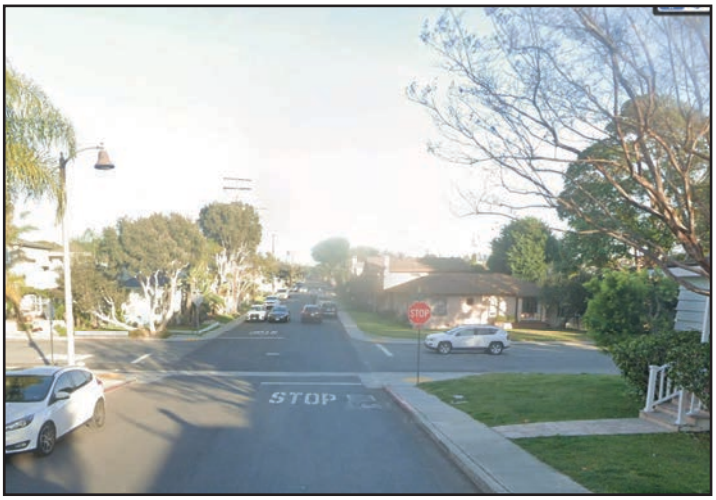
View 2: El Segundo Library to the northwest of the Project Site.

PHOTO LOCATION MAP

Source: GoogleEarth, July 2023.

Figure II-2
Views of Surrounding Uses
Views 1 and 2

View 3: View of the residential neighborhood to the west of the Project Site.



View 4: View of the residential neighborhood to the east of the Project Site.

PHOTO LOCATION MAP

Source: GoogleEarth, July 2023.

Figure II-3
Views of Surrounding Uses
Views 3 and 4

View 5: Chevron Refinery to the south of the Project Site.

View 6: Chevron Refinery to the southwest of the Project Site.

PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, July 2023.

Figure II-4
Views of Surrounding Uses
Views 5 and 6

3. Existing Conditions

a) General Plan and Zoning

Figure III-2, Existing Land Use Designations, and **Figure III-3, Existing Zoning**, included in **Section III, Project Description** show the Project Site's existing zoning and general plan designations, respectively. As shown in **Figure III-2**, the City's General Plan designates the Downtown area as Downtown Commercial (8.8 acres) and Downtown Specific Plan (26.3 acres), where existing uses are already of a community-serving nature. According to the City's General Plan, the Downtown Commercial designation permits community serving retail, community serving office, and residential on the floor above street level only if commercial is on the street level, at a maximum floor area ratio (FAR) of 1.0. Residential uses are limited to a maximum density of 10 dwelling units per acre.[2] As shown in **Figure III-3**, the zoning for the Specific Plan area is Downtown Specific Plan (DSP) and Downtown Commercial (C-RS), which corresponds to the General Plan land use designations.

b) Project Site

The Project area is currently developed with a wide range of commercial, residential, and public uses. Existing development within the Project area ranges from one- to three-story buildings, with many buildings located along or near the front property line at one to two-story heights and a few three-story buildings. The Project area is generally gently sloping with some steeper topography along portions Main Street and the Marketplace Alley, as shown in **Figure II-5, Aerial Map of Downtown El Segundo Specific Plan Update Area**, and **Figures II-6 through II-9, Views of the Project Site**.

[2] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed March 2023.*

Project Area

Source: Google Maps, May 2022.

Figure II-5
Aerial Map of Downtown El Segundo Specific Plan Update Area

View 1: View looking south down Main Street from Grand Avenue.

View 2: View looking north down Main Street from Grand Avenue.

PHOTO LOCATION MAP

Source: GoogleEarth, July 2023.

Figure II-6
Views of the Project Site-Grand Avenue and Main Street
Views 1 and 2

View 3: View looking east down Grand Avenue from Main Street.

View 4: View looking west down Grand Avenue from Main Street.

PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, July 2023.

Figure II-7
Views of the Project Site-Grand Avenue and Main Street
Views 3 and 4

View 5: View looking south down Main Street from Holly Avenue.

View 6: View looking north down Main Street from Holly Avenue.

PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, July 2023.

Figure II-8
Views of the Project Site-Holly Avenue and Main Street
Views 5 and 6

View 7: View looking east down Holly Avenue from Main Street.

View 8: View looking west down Holly Avenue from Main Street.

PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, July 2023.

Figure II-9
Views of the Project Site-Holly Avenue and Main Street
Views 7 and 8

c) Public Transit and Bicycle Routes

Public transit that operates in the vicinity of the Specific Plan area includes a Beach Cities bus line. Beach Cities Line 109 provides local service between the City of Redondo Beach and LAX and runs along Main Street.

The City adopted the South Bay Bicycle Master Plan, and it has implemented some of the bicycle improvements in the plan network, including 2.0 miles of Class III Bike Routes (where vehicles and bicycles share travel lanes) on several City streets. The bike routes closest to the Specific Plan area are on Main Street and Grand Avenue. The Bicycle Master Plan includes Class I Bike Paths, Class II Bike Lanes, Class III Bike Routes, and Bike-Friendly streets. To date, the City has completed Class 2 Bike lanes along Rosecrans Avenue (approx. 1.1 miles), approximately 5 miles of Class 3 Bike Routes citywide, and a 0.2-mile Class 1 Bike Path along El Segundo Boulevard (between Nast Street and Continental Boulevard). In 2022, the City completed the design and in 2023 began construction of an approximately 0.2-mile Class 1 Bike Path along El Segundo Boulevard (between PCH and Continental Boulevard). In addition, in 2023, the City began construction of approximately 5.2 miles of Class II Bike Lanes on El Segundo Boulevard (from Aviation Boulevard to PCH), on Douglas Street (between Rosecrans Avenue and Imperial Highway), and on Nash Street (between El Segundo Boulevard and Imperial Highway). Existing transit routes and bicycle lanes are depicted in **Figures IV.L-2 and IV.L-3**, respectively, in **Section IV.L, Transportation** of this Draft EIR.

4. Public Services and Utilities

a) Public Services

Fire protection services are provided by the El Segundo Fire Department, which has two stations. Fire Station 1 is located at 314 Main Street, which is within the Specific Plan area. Fire Station 2 is located at 2261 East Mariposa Avenue (at Mariposa Avenue and Douglas Street), which is approximately two miles from the Project area.

Police services are provided by the El Segundo Police Department, which is located at 348 Main Street, which is within the Specific Plan area.

The El Segundo Unified School District provides public educational services to the City, which includes the Project area. The Project area is within the service area of Richmond Street School (grades K–5), El Segundo Middle School (grades 6–8), and El Segundo High School (grades 9–12).

The El Segundo Public Library provides library services to the City and is located at 111 West Mariposa Avenue, just north of the Project area. The El Segundo Public Library also partners with El Segundo Unified School District to provide services at four school libraries, including El Segundo High School, El Segundo Middle School, Center Street Elementary School, and Richmond Street School.

The Project's public service providers and the potential for the Project to generate environmental impacts associated with these public services, is discussed in **Section IV.K, Public Services**, of this Draft EIR.

b) Utilities

The City is a retail water supplier to both residential and commercial customers. The City uses both potable and recycled water. The City is entirely dependent on imported water purchased from West Basin Municipal Water District, which is a wholesale water supplier, for its potable water supply and does not use groundwater as a source of potable water.

Sewer/wastewater collection is provided by the City and the Los Angeles County Sanitation District. All existing sanitary sewer lines in the streets surrounding the Project area are owned by the City.

Natural gas is provided by Southern California Gas Company and is currently available within the Project area.

Electric power is provided by Southern California Edison to the Specific Plan area through an underground utility conduit system in the streets within the Project area.

Cable and telecommunication services are provided by Sonify, Velocity, Verizon, CenturyLink, and Charter Communications in the vicinity of the Project area.

Solid waste disposal is provided to multiple-family and commercial users by a variety of private haulers.

The Project's utility providers and the potential for the Project to generate environmental impacts associated with the utility infrastructure is discussed in **Section IV.N, Utilities and Service Systems**, of this Draft EIR.

5. Related Projects

Sections 15126 and 15130 of the *State CEQA Guidelines* require that EIRs consider the significant environmental effects of a project as well as "cumulative impacts." Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (*State CEQA Guidelines* Section 15355).

As set forth in Section 15130 of the *State CEQA Guidelines*, the determination of cumulative impacts is generally a two-step process. The first step is to determine whether or not the combined effects from the proposed project and related projects, as identified below, would result in a potentially significant cumulative impact. If the answer is no, then the EIR only briefly needs to indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. If the answer is yes, then the analysis proceeds to the second step, which is to determine whether the proposed project's incremental effects are cumulatively considerable. Section 15065(a)(3) of the CEQA Guidelines defines "cumulatively considerable" to mean that the incremental effects of an individual project are significant when viewed in connection with the

effects of past projects, the effects of other current projects, and the effects of probable future projects. In accordance with CEQA Guidelines Section 15130(a)(3), a project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. In addition, the lead agency is required to identify facts and analyses supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

State CEQA Guidelines Section 15130(b) further provides that the discussion of cumulative impacts reflects "the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great of detail as is provided for the effects attributable to the project alone." Rather, the discussion is to "be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute."

The *State CEQA Guidelines* (Section 15130(b)(1)(A) and (B)) explain that either of the following methods are necessary to provide an adequate discussion of significant cumulative impacts:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

Cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary. For example, a cumulative land use impact generally may only affect the compatibility of uses within the vicinity of a project site, while a cumulative air quality impact may affect the entire air basin.

The analyses in this EIR are primarily based on the List Method for evaluating cumulative effects. A list of Related Projects has been prepared (see **Table II-1, List of Related Projects**) which includes recently completed, approved, under construction, proposed, or reasonably foreseeable projects within the vicinity of the Project that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project. The list of Related Projects was developed to match the cumulative development considered in the Project's Water Supply Assessment,[3] which was based on information provided by the El Segundo Community Development Department.

As shown in **Table II-1**, there are 13 Related Projects within the Project area that propose a variety of development that include office, commercial/retail, restaurant, research and development (R&D), industrial/warehouse, studio/production facilities, data center, and residential land uses. Cumulatively, the Related Projects are expected to generate 15,131 employees and 5,294 residents within the City.

[3] *Maddaus Water Management, Inc. El Segundo Downtown Specific Plan Updated Water Supply Assessment. December 2023.*

Adjacent neighborhoods to the north and west outside of the Project Area are primarily residential in nature, consisting mostly of single-family homes. As suggested by the Southern California Association of Governments (SCAG) 2020 Connect SoCal (RTP/SCS) growth forecast, no change in population or employment is expected to occur in those primarily residential non-Project areas through 2040.

The list of Related Projects is intended to demonstrate the reasonably anticipated magnitude of development that may occur in the vicinity of the Project during the buildout of the Project based on projects currently on file. Analysis of the Project and the Related Projects is conservative because it is unlikely that all of the Related Projects would be developed due to various circumstances such as changes in economic conditions or delays in obtaining entitlements. Nevertheless, the examination of future conditions, assuming continual development within the Specific Plan area, lacks a specified endpoint for development. The Related Projects are shown on **Figure II-10, Location of Related Projects**.

Table II-1
List of Related Projects[1]

ID	Project	Size (square-feet)	Housing (units)	Employees (persons) [2]	Population (persons) [3]
1	**Housing Element** [4, 5]				
	Residential	--	1,846	--	4,504
	Retail	46,770	--	105	--
2	**Pacific Coast Commons Specific Plan (EA 1248)**				
	Residential	--	263	--	642
	Retail/Restaurant	11,252	--	25	--
3	**South Campus (Raytheon) Specific Plan**				
	Retail/Restaurant	126,310	--	283	--
	Office	1,547,407	--	5,411	--
	Industrial/Warehouse	259,840	--	700	--
	Nash Street Exchange Part A				
	Medical Office	43,000	--	150	--
	Restaurant	19,150	--	43	--
	Nash Street Exchange Part B				
	Restaurant	3,500	--	8	--
	Chargers Training Facility and Headquarters				
	Corporate Office	143,250	--	501	--
4	**Stick n Stein Mixed Use (EA 1325)**				
	Residential	--	50	--	122
	Commercial Retail	14,000	--	31	--
5	**201-209 Richmond St. (EA 1299)**				
	Retail	3,307	--	7	--
	Office	9,450	--	33	--
	Residential	--	4	--	10
6	**Beach Cities Media Campus Phase 1 and 2 Office Campus (EA 1339)**				
	Office	240,000	--	839	--
	Studio/Production Facilities	66,000	--	178 [6]	--
	Retail	7,000	--	16	--
7	**650-700 N PCH Office (EA 1289)**				
	Office	122,156	--	427	--
8	**1950-1960 E. Grand Ave. (EA 1291)**				
	Office	105,469	--	369	--

Table II-1
List of Related Projects[1]

ID	Project	Size (square-feet)	Housing (units)	Employees (persons) [2]	Population (persons) [3]
9	**Smoky Hollow Specific Plan (partial)** [7]				
	Commercial	22,461	--	50	--
	R&D	404,584	--	1,230	--
	Office	1,042,103	--	3,644	--
	Standard Works Project North				
	Office	45,568	--	159	--
	Coffee Kiosk	766	--	2	--
	Standard Works Project South				
	Office	44,604	--	156	--
	212 Eucalyptus Dr. (EA 1254)				
	Office	14,119	--	49	--
	140 Sheldon St.				
	Office	800	--	3	--
	Caretaker Units Project				
	Residential	--	6	--	15
10	**140 Oregon St. (EA 1233)**				
	Office Addition	57,675	--	202	--
11	**141 Eucalyptus Dr. (EA 1292)**				
	Office	8,882	--	31	--
12	**445 N. Douglas – Data Center Phase 2**				
	Data Center	155,664	--	420 [5]	--
13	**2200 Grand Parking Structure and Office**				
	Office	16,934 (net)	--	59	--
			Total Generation	**15,131**	**5,293**

1 *List of related projects and development details source: Maddaus Water Management, Inc., El Segundo Downtown Specific Plan Updated Water Supply Assessment, December 2023. Land uses that would generate no employees or residents (e.g., parking lots) have not been included.*

2 *Employee generation rates source: El Segundo Unified School District, Residential and Commercial/Industrial Development School Fee Justification Study, May 11, 2020, Table ES-4, page ES-5. Rates utilized are as follows: Retail and Service: 447 square feet per employee; Office: 286 square feet per employee; Industrial/Warehouse/Manufacturing: 371 square feet per employee; Research & Development: 329 square feet per employee.*

3 *Population generation rate of 2.44 persons per household used. Source: U.S. Census Data for El Segundo, 2020.*

4 *The Housing Element has been included as a Related Project. The Housing Element is a policy document that does not directly approve development projects; however, it has been included in an effort to provide the most conservative assumptions and analysis of potential cumulative impacts of the Project. The Housing Element identifies a list of sites that will be rezoned to allow for higher density residential development. These rezoned sites are located within the northwest quadrant of the City outside of the boundaries of the Downtown Specific Plan Update area. Therefore, there would be no significant cumulative impacts under the Project associated with the Housing Element. City of El Segundo, Community Development Department, Housing Element, September 2022, available at: https://www.elsegundo.org/home/showpublisheddocument/6807/638156090438070000.*

5. *The Housing Element proposes an additional 1,912 multi-family residential units and 64,077 square feet of net added retail space. Consistent with the approach for the Project's Water Supply Assessment, net population and commercial development occurring prior to 2023 and development included as unique related projects in this table have been subtracted from these totals including: 16 residential units built prior to 2023; 201-209 Richmond Street (EA 1299)—Related Project 5; and Stick n Stein Mixed Use (EA 1325)—Related Project 4.*

6 *Industrial/Warehouse/Manufacturing employee generation rate used.*

7 *Consistent with the approach of the Project's Water Supply Assessment, although the 140 Oregon St. and 141 Eucalyptus Dr. projects are under the Smoky Hollow Specific Plan, they have been included as unique related projects in this table and have been subtracted from the totals proposed under the Specific Plan.*

Source (table): EcoTierra Consulting Inc., 2023.

6. References

City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan . Accessed March 2023.

City of El Segundo. City of El Segundo General Plan, 4. Circulation Element. Adopted September 2004.

El Segundo Unified School District, *Residential and Commercial/Industrial Development School Fee Justification Study*, May 11, 2020, Table ES-4, page ES-5.

Maddaus Water Management, Inc. *El Segundo Downtown Specific Plan Updated Water Supply Assessment*. December 2023.

U.S. Census Data for El Segundo, 2020.

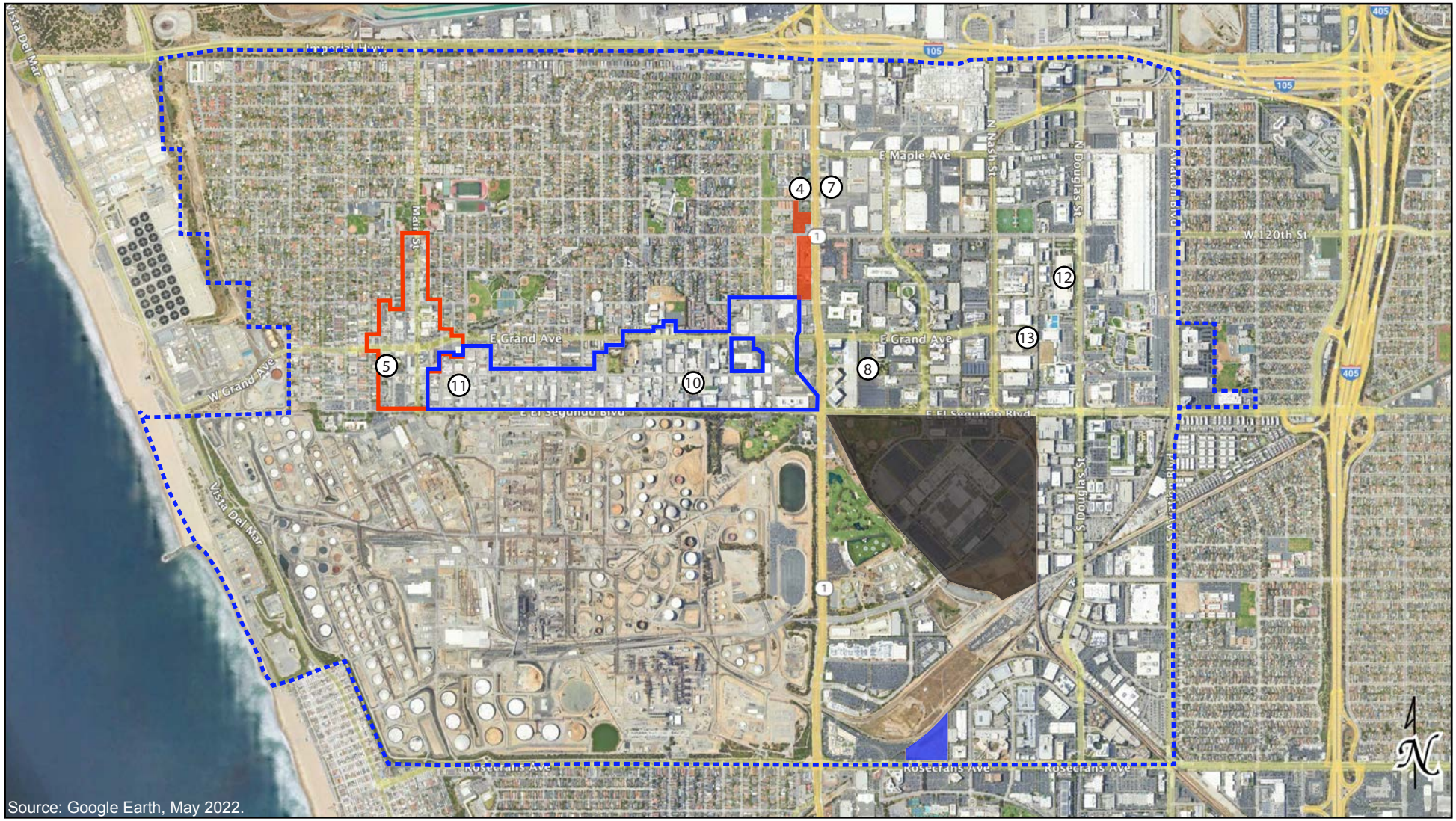


Figure II-10
Location of Related Projects

III. Project Description

Section III of this Draft Environmental Impact Report (EIR) provides a description of the El Segundo Downtown Specific Plan Update (Project). The purpose of this section is to describe the Project in a manner that will be meaningful for review by the public, reviewing agencies, and decision-makers in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Sections 21000 et seq., and the *State CEQA Guidelines* (14 CCR 15000 et seq.). Per the requirements of Section 15124 of the *State CEQA Guidelines*, a complete project description must contain the following information:

(a) the precise location and boundaries of the Project, shown on a detailed map, along with a regional map of the Project's location (see **Section III.3**);

(b) a statement of the objectives sought by the Project, which should include the underlying purpose of the Project (see **Section III.6**);

(c) a general description of the Project's technical, economic, and environmental characteristics, considering the principal engineering documentation and supporting public service facilities (see **Section III.5**); and

(d) a statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of permits or other approvals required to implement the Project, and a list of related environmental review and consultation requirements imposed by federal, state, or local laws, regulations, or policies (see **Section III.7** and **III.8**).

In accordance with Section 15124 of the *State CEQA Guidelines*, the description of a project "should not supply extensive detail beyond that needed for evaluation and review of environmental impacts." This section of the Draft EIR includes the required information, as listed above.

As stated in Section 15126.2 of the *State CEQA Guidelines*, an EIR must identify and focus on the significant effects of a project on the environment. In assessing the impacts of a proposed project, the lead agency "should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published." The approval and implementation of the proposed El Segundo Downtown Specific Plan Update would allow for physical changes in the environment, which are analyzed in this Draft EIR.

1. Project Summary

The Project is an update to the adopted El Segundo Downtown Specific Plan, which serves as land use and zoning for properties within the boundaries of the Specific Plan area. The Project would revise existing Specific Plan planning districts, amend General Plan and zoning

designations on eight parcels, and include mobility enhancements. The Project would include direction for public improvement and streetscape guidelines, private urban form criteria, a list of permitted and conditionally permitted land uses in each district within the Specific Plan area, development standards, mobility and infrastructure improvements, an implementation plan, and administration processes.

The Project proposes amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels from Downtown Commercial to Downtown Specific Plan. The Project would also amend the City's zoning map to change the zoning on eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP). The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units.

In addition to land use and zoning changes, the Project would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would create potential changes to the number of travel lanes on those streets. The Project would potentially relocate a portion of an existing truck route that is located on Main Street between El Segundo Boulevard and Grand Avenue (pending a future Truck Route Study). The Project also proposes the potential permanent closure of a portion of Richmond Street to vehicles, generally from Franklin Avenue to Grand Avenue, to create a permanent pedestrian only street for outdoor dining and gathering; and recommends maintaining the existing Class III bike route "sharrows" and/or upgrading them to Class II bike lanes. The Project would include pedestrian and transit improvements in the Project area including widened sidewalks and expanded outdoor seating and dining areas for area restaurants. Transit improvements could include bus stop enhancements such as additional transit shelters, lighting, and furnishings, and could potentially provide expanded bus zones.

The Project would include modifications to parking standards and strategies and alternatives for on-street parking and would potentially provide two new parking structures at the northwest corner of Grand Avenue and Standard Street and the northeast corner of Richmond Street and Franklin Avenue. Lastly, the 2000 Specific Plan area was previously divided into six districts and the Specific Plan Update would adjust the Specific Plan area into four districts: Main Street, Richmond Street, Grand Avenue, and Civic Center districts.

2. Specific Plan Requirements and Authority

California Government Code Section 65450 states that after a General Plan has been adopted, a Specific Plan may be prepared for the systematic implementation of the General Plan for all or part of the area covered by the General Plan. The El Segundo Downtown Specific Plan was prepared in accordance with the requirements of the California Government Code (Title 7, Division 1, Chapter 3, Article 8, Sections 65450–65457), which would allow jurisdictions to adopt Specific Plans to implement their General Plans. Adoption of a Specific Plan is a legislative act that is conducted in the same manner as a General Plan. The purpose of a Specific Plan is to provide for the orderly development of a property through compliance with site-specific development standards that are consistent with the intent and policies of the General Plan.

Upon adoption of a Specific Plan, it becomes the zoning for the site and sets regulations that govern the allowable land uses, development density, and development standards for future development projects in the Specific Plan area, in place of the City's existing zoning regulations. However, regulations and standards in the City's zoning regulations that are not covered by the Specific Plan would continue to be applicable to future development.

The purpose of the Project is to provide a foundation for the proposed land uses within the Specific Plan area through the application of regulations, standards, and design guidelines. The Specific Plan Update provides text and exhibits that describe the proposed land uses and associated guidelines. The proposed Specific Plan Update is provided as **Appendix B** to this Draft EIR.

This Specific Plan would be adopted pursuant to Government Code Section 65450 through 65457. Pursuant to Government Code Section 65451, a Specific Plan must include text and a diagram or diagrams which specify all of the following in detail:

- The distribution, location, and extent of the uses of land within the area covered by the plan.
- The proposed distribution, location, extent, and intensity of major components of public and private transportation, wastewater, water, storm drainage, and dry utilities and public facilities proposed to be located within the land area covered by the plan and needed to support the land uses described in the plan.
- Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.
- A program of implementation measures including regulations, programs, public works projects and financing measures necessary to carry out the above items.
- A discussion of the relationship of the Specific Plan to the General Plan.

As described in **Section IV.H, Land Use and Planning**, of this Draft EIR, a review of the El Segundo General Plan shows that the Project would be compatible and consistent with the goals, objectives, and policies outlined in the General Plan. The proposed Specific Plan Update was prepared to provide the essential relationship between the policies of the El Segundo General Plan and actual development of the Specific Plan area. By functioning as a regulatory document, the Specific Plan Update would provide a means of implementing the City of El Segundo's General Plan. All future development plans and entitlements within the Specific Plan area boundaries must be consistent with the standards set forth in the Specific Plan Update (**Appendix B** of this Draft EIR).

3. Project Location

The Specific Plan Update area (Project area) is located in Downtown El Segundo, in the northwest quadrant of the City, which is approximately 20 miles southwest from downtown Los Angeles. Downtown El Segundo is located southwest of the interchange of Interstate 405 Freeway (I-405)

and State Route 90 (Imperial Highway), west of Pacific Coast Highway and north of El Segundo Boulevard. Interstate 105 Freeway (I-105) is north of the Specific Plan area, immediately north of Imperial Highway.

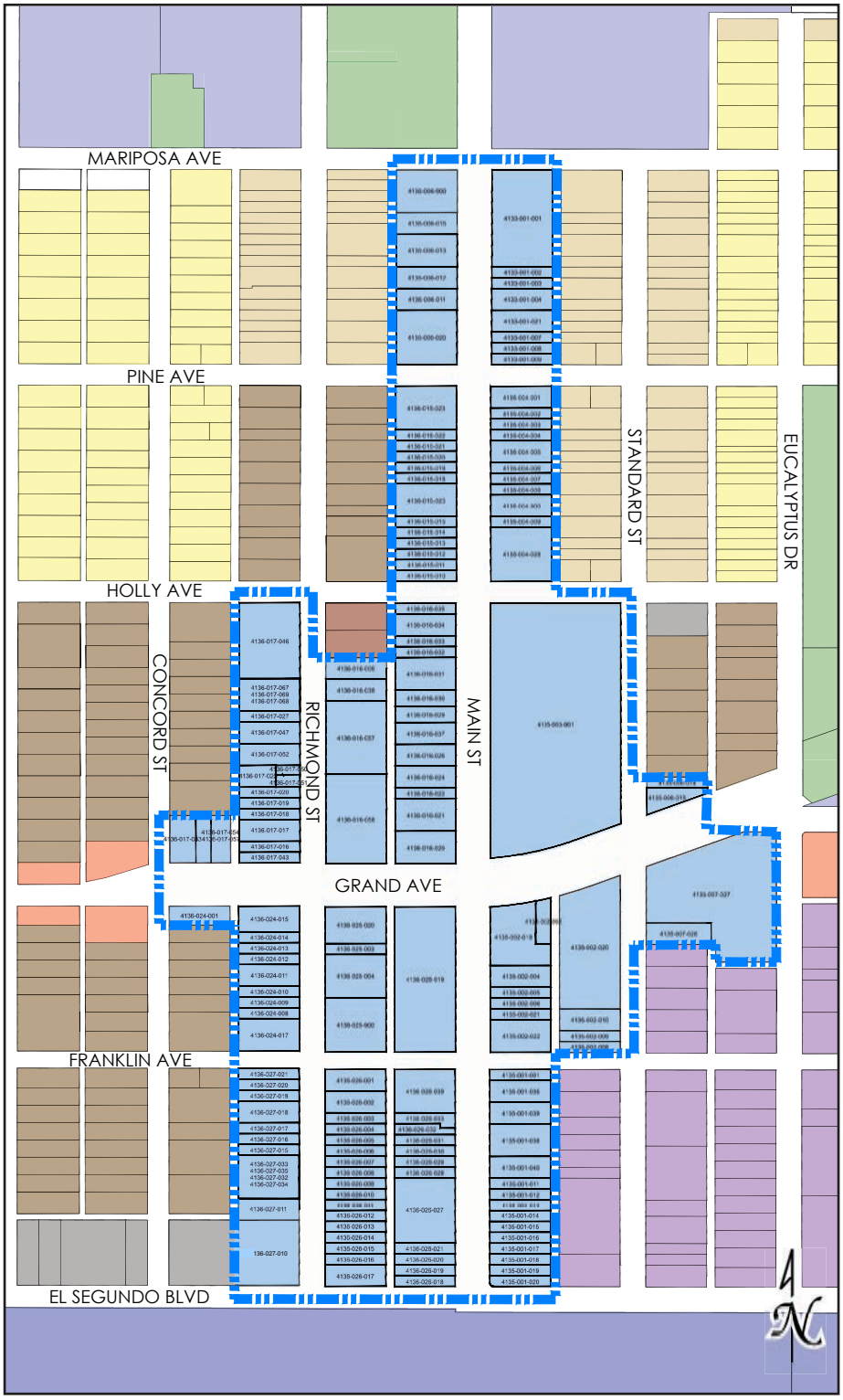
The Project area is approximately 43.8 acres in size. The Project area is irregular in shape with portions extending to Eucalyptus Drive to the east, El Segundo Boulevard to the south, Concord Street to the west, and Mariposa Avenue to the north. Los Angeles International Airport (LAX) is located to the north; the Los Angeles County community of Del Aire and the City of Hawthorne are located to the east; the Cities of Manhattan Beach and Hawthorne are located to the south; and the Hyperion Wastewater Treatment Plant, Dockweiler Beach, and Pacific Ocean are located to the west.

The Project area location is shown in **Section II, Environmental Setting, Figure II-1, Regional Location Map** and **Figure III-1, Specific Plan Update Project Boundary.**

4. Existing Setting

The Project area is currently developed with a wide range of commercial, residential, and public uses. Existing development within the Project area ranges from one- to three-story buildings, with many buildings located along or near the front property line at one to two-story heights and a few three-story buildings. The Project area is generally gently sloping with some steeper topography along portions Main Street and the Marketplace Alley.

Although most of the Project area is zoned and designated as Downtown Specific Plan (DSP), the Project would revise the Specific Plan boundary to include an additional area east of the 2000 Specific Plan boundary. Existing land use designations and zoning for the Project area are shown in **Figure III-2, Existing Land Use Designations** and **Figure III-3, Existing Zoning.**



LEGEND

- Project Area Boundary
- Downtown Specific Plan
- Single-Family Residential
- Two-Family Residential
- Multi-Family Residential
- Smoky Hollow
- Parks
- Downtown Commercial
- General Commercial
- Public Facilities
- Heavy Industrial
- Parking

Source: RRM Design Group, August 2022.

Figure III-1
Specific Plan Update Project Boundary

Source: RRM Design Group, August 2022.

Figure III-2
Existing Land Use Designations

Source: RRM Design Group, August 2022.

Figure III-3
Existing Zoning

a) Surrounding Land Uses

Existing surrounding land uses are generally residential in nature, ranging from one- to three-stories in height in a fully developed urban environment.

(1) North

Land uses to the north include El Segundo High School campus, El Segundo Library, and Library Park located on Main Street. Neighborhoods surrounding these civic uses are comprised mainly of single-family dwellings, duplexes, and apartment complexes.

(2) West

Land uses to west are zoned as Neighborhood Commercial (C-2) along Grand Avenue, Multi-Family Residential (R-3), and Two-Family Residential (R-2). Less than a mile from the western edge of the Specific Plan is the Pacific Ocean. The neighborhoods between Downtown El Segundo and the coast are comprised mainly of single-family dwellings, duplexes, and apartment complexes.

(3) South

The Chevron Refinery is south of El Segundo Boulevard. The Chevron Refinery is zoned Heavy Industrial (M-2) and covers over 1,000 acres of land.

(4) East

Neighborhoods to the east are comprised of a mix of single-family dwellings, duplexes, and apartment complexes. Areas southeast of the Project area contain the Smoky Hollow Specific Plan area and are developed with light industrial and office uses. El Segundo Recreation Park, located along Pine Avenue and Eucalyptus Drive, provides recreational facilities for a range of sports, including softball, roller hockey, tennis, and basketball.

5. El Segundo Downtown Specific Plan

a) Adopted Specific Plan

The City adopted the El Segundo Downtown Specific Plan on August 1, 2000 with a 10-year vision. The adopted Specific Plan provides land use and development standards for the area including, but not limited to, standards for heights, setbacks, density, lot area, outdoor uses, landscaping, parking, loading, circulation, and signage. Design standards also regulated site development, street configurations, streetscape (sidewalks, street furniture, bus stops, bicycles), landscaping, lighting (street and pedestrian, decorative and security), architecture, and signage. The adopted Specific Plan divides the area into six Districts, each having distinct characteristics and standards.

The adopted Specific Plan describes the vision for the area; plan philosophy and concept; an overview of the plan area; General Plan policies applicable to the plan; descriptions of the Specific Plan Districts; administrative steps; development, parking, and design standards by district; and implementation and financing considerations. The adopted Specific Plan describes permitted uses, permitted accessory uses, uses subject to administrative and conditional use permits, prohibited uses, and site development standards.

The adopted Specific Plan includes six classes of use districts intended to be used within the boundaries of the Downtown Specific Plan. These districts include:

- MSD - Main Street District
- MSTD - Main Street Transitional District
- NRSD - North Richmond Street District
- RSD - Richmond Street District
- GAD - Grand Avenue District
- WGATD - West Grand Avenue Transitional District

The adopted Specific Plan allows for the development of a variety of commercial and government uses. Some of the permitted uses vary depending on the Specific Plan District, but generally include retail, restaurants, recreational, governmental, banks, offices, medical and dental, outdoor retail uses, schools, and above street-front level residential units.

The Downtown Specific Plan General Plan designation allows for community serving retail and services uses, offices, and the Civic Center and in a pedestrian-oriented environment.

b) Specific Plan Update

The Project is a proposed update to El Segundo Downtown Specific Plan. The vision of this Specific Plan Update is to create an economically prosperous Downtown with a mix of uses and

entertainment options and cohesive elements that tie the community together. The Project's goal is to create a balance of uses within the Downtown to reach its optimal potential and to provide direction for streetscape beautification, outdoor gathering spaces, improved mobility, and other enhancements that establish a unique and inviting environment highlighting its historical and cultural roots to enrich this community destination.

The complete text of the proposed El Segundo Downtown Specific Plan Update is included in **Appendix B** of this Draft EIR.

(1) Districts

The 2000 Specific Plan area is divided into six districts. The Project would update the 2000 Specific Plan district boundaries and consolidate the existing six districts into four new districts. This reorganization would more fully describe existing community values, expected market demand, and shared characteristics, including the vision of range of allowable uses and development standards to support the desired future condition of the districts. The district-based approach combines different types of activities, such as residential, commercial, and recreational, to create a diverse, vibrant, and walkable area where the desired activities and building forms dictate what is conditionally allowed and what is not allowed. This hybrid approach to zoning combines form-based development standards with a selection of compatible uses tailored for each Specific Plan district and allows for shaping of the built environment, while providing flexibility in the types of allowable uses.

The proposed Specific Plan Districts are described below and shown in **Figure III-4, Proposed Specific Plan Districts.**

(a) Main Street District

This district is considered the Downtown core or "heart" and runs north-south along Main Street between Grand Avenue and Mariposa Avenue and is bounded by alleys to the east and west. Its focus is to serve residents, local employees, and visitors within the most pedestrian oriented environment – narrow street width and wide sidewalks, high volume pedestrian-oriented uses at the ground floor, and building design that emulates a historic building pattern. The district contains a wide variety of commercial uses and abuts Multi-Family Residential (R-2 and R-3) uses to the east and west across the adjacent alleyways. This district includes portions of the previous 2000 Specific Plan districts: Main Street District and Main Street Transitional District.

(b) Richmond Street District

The Richmond Street District is generally located along Richmond Street and is situated one block west and parallel to Main Street. This district is similar in nature to the Main Street district, and it contains some of the oldest commercial buildings in the city, including the Old Town Music Hall. The district abuts Multi-Family Residential (R-3) uses to the west across the alley. It is an eclectic mixed-use environment of commercial and residential uses and includes the previous 2000 Specific Plan districts: Richmond Street District, North Richmond Street District, Grand Avenue District, and West Grand Avenue Transitional District.

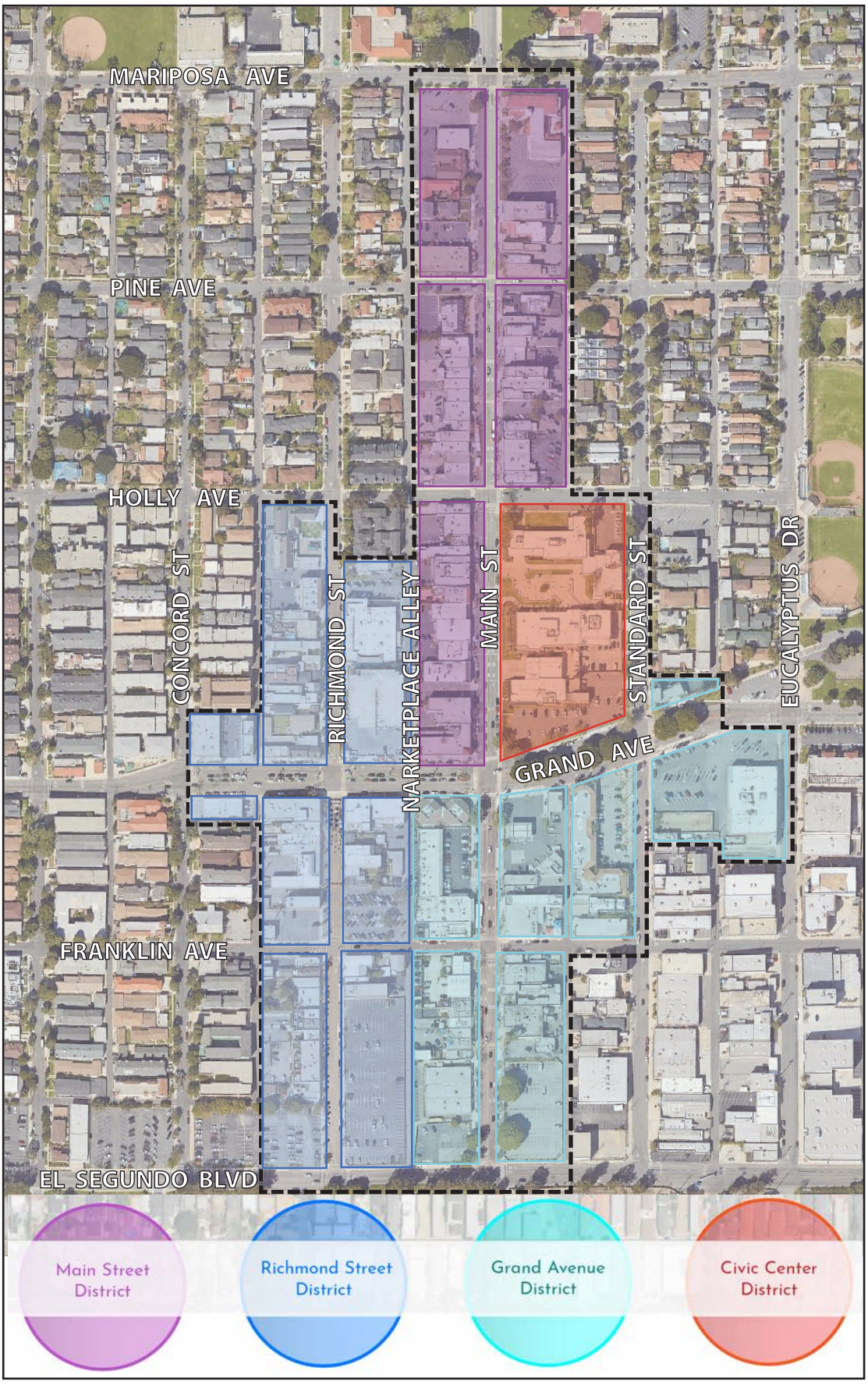


Figure III-4
Proposed Specific Plan Districts

(c) Grand Avenue District

The Grand Avenue District serves as a gateway from the east entry of the City of El Segundo to the Downtown core and contains larger lots and contiguous parcels which provide the highest redevelopment opportunity within the Specific Plan area. The Grand Avenue District is generally located along the southern side of Grand Avenue from Marketplace Alley to Eucalyptus Drive and contains portion of Main Street and Standard Avenue. It is bounded by multi-family residential uses (R-3) to the north with light industrial and office (SH-W) to the east and south which provide a buffer to surrounding single-family residential uses. This district contains and includes a few lots that are currently zoned C-RS and a portion of the 2000 Specific Plan's Main Street Transitional District.

(d) Civic Center District

Located centrally in the Specific Plan area, this district includes City Hall, the El Segundo Police Department, the El Segundo Fire Department, and existing public plaza and open spaces. The existing plaza and open spaces at the Civic Center complex offer opportunities to activate and reinvigorate this area as a central public gathering hub and add vibrancy to the north end of Main Street. The underutilized surface parking areas along Grand Avenue provide an opportunity for a public parking structure that would allow for street parking to be reused for pedestrian seating and gathering spaces in key locations throughout the Downtown. Reduced travel lanes on Main Street will provide for increased pedestrian uses and streetscape improvements along the Main Street frontage. This district was part of the Main Street District in the previous 2000 Specific Plan.

(2) Potential Development

As shown in **Table III-1, Anticipated Downtown Specific Plan Area Development Through 2040**, the Downtown Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units within the Specific Plan area.

Table III-1
Anticipated Downtown Specific Plan Area
Development Through 2040

Land Use	Square Footage
Retail/Restaurant	130,000
General Office	200,000
Medical Office	24,000
Multi-Family Units	300
Source: RRM Design Group, 2023.	

(a) Proposed General Plan Designation

The proposed Downtown Specific Plan General Plan designation would allow for land uses that encourage reinvestment and revitalization of each Downtown District consistent with the vision and planning principles noted above under the description of each District's goals.

Additionally, the Specific Plan Update proposes amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels from Downtown Commercial to Downtown Specific Plan. These parcels are located on the eastern edge of the Downtown Specific Plan, fronting Grand Avenue.

Proposed land use designations are shown in **Figure III-5, Proposed Land Use Designations.**

(b) Proposed Zoning

The Specific Plan Update would also amend the City's zoning map to change the zoning on eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP). The idea behind the amendments in zoning is to create allowable densities that are high enough to facilitate market-driven redevelopment and allow for the flexibility to develop desirable land uses. The Downtown Commercial designation currently allows billiard-pool rooms and bowling alleys; daycare centers; financial institutions; general offices; governmental buildings; medical-dental offices; restaurants; retail uses; and schools.

The proposed Downtown Specific Plan Update would utilize a hybrid approach to zoning, which combines form-based development standards with a selection of compatible uses that have been tailored for each Specific Plan District. Each District contains a list of Permitted Uses as well as others that may be subject to special conditions regarding the location, operation, design, or have special permitting requirements. Following an application submittal, the Director of Community Development (or his/her designee) would determine whether the proposed use is a Permitted Use, Conditionally Permitted Use, Accessory Use, Prohibited Use, or require an Administrative Use Permit.

Proposed zoning is shown in **Figure III-6, Proposed Zoning.**

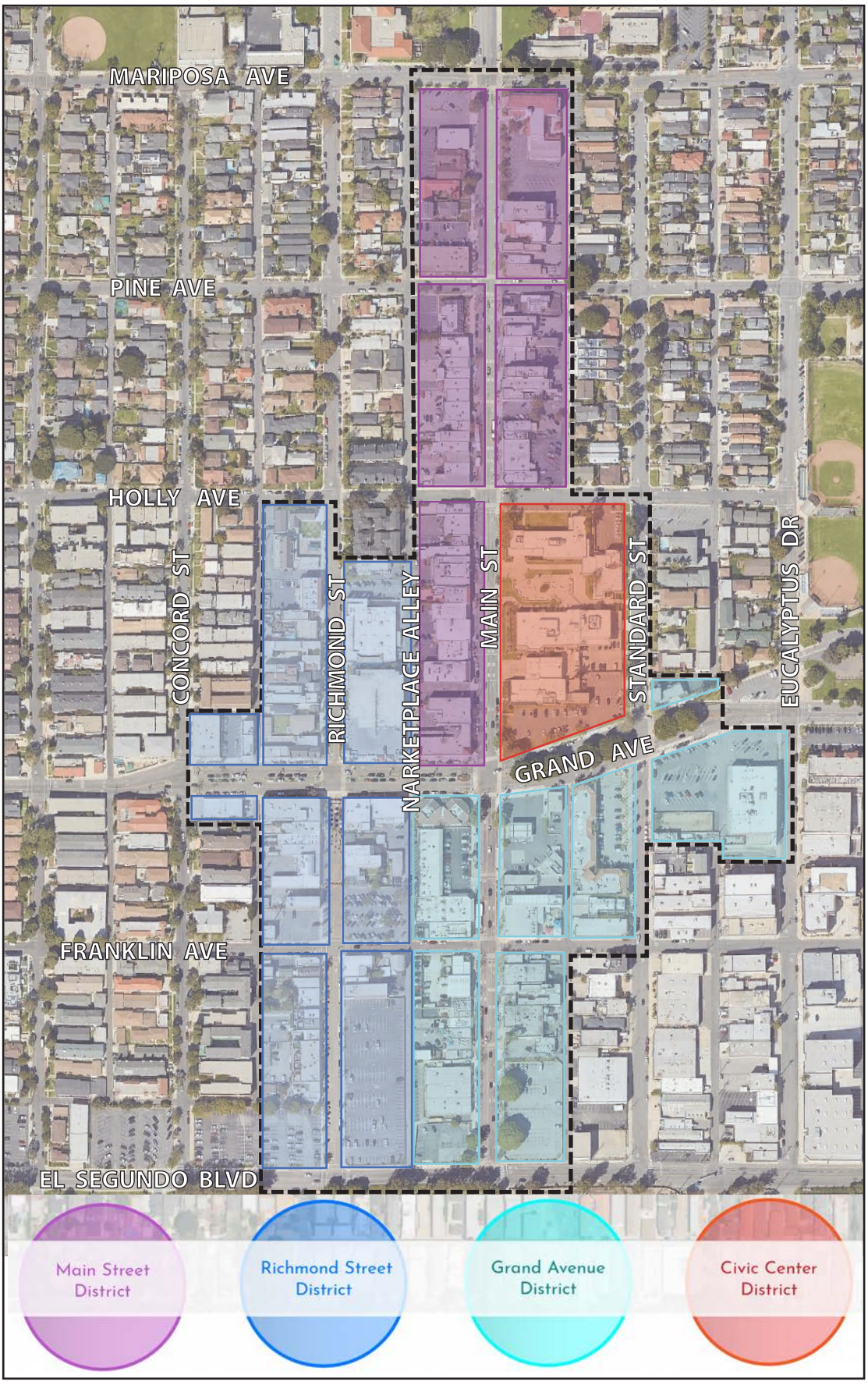


Figure III-4
Proposed Specific Plan Districts

Source: RRM Design Group, August 2022.

Figure III-5
Proposed Land Use Designations

(3) Land Use and Development Standards

The Specific Plan uses a district-based approach to govern land uses and development standards. The Land Use and Development Standards chapter would set forth general provisions for development within the Specific Plan area and detail the permitted land uses and development standards that are customized for each district. The regulations within the chapter would guide growth and development in the Specific Plan area to accommodate a desired mix of uses with guidelines and standards included to create a development form and composition that supports a vibrant, active Downtown shopping district and neighborhood.

(a) Main Street District

The Specific Plan Update vision for the Main Street District is centered on maintaining the historic small-town character of the area by creating a pedestrian-friendly environment with outdoor dining while allowing residential and office uses above or behind Main Street retail. As shown in **Table III-2, Development Standards for Main Street District**, the following site development standards would ensure intentional site planning and design.

Table III-2
Development Standards for Main Street District

	Existing	Proposed
Building Placement and Orientation	1. New construction on the first floor shall be built to or near the front and streetside property lines throughout Downtown. 2. Parking should be located behind the building or in off-site parking facilities, not within the front setback or in front of buildings.	1. The building frontage must be oriented toward Main Street. 2. Required on-site parking shall not be located between the building and the Main Street property line.
Lot Area	3,500 square feet minimum.	5,000 square feet minimum.
Lot Width	25 feet minimum for new lots.	25 feet minimum for new lots.
Setbacks Front/Street Adjacent Yard	There shall be no setback between a building and the front and streetside property lines on the street level, except pedestrian-oriented plazas or architectural features, up to 10 feet in depth, may be placed between the building and the street, subject to design review.	1. Zero setback at ground floor maximum 2. 10 feet maximum permitted for pedestrian-oriented plazas or outdoor dining, subject to design review.
Side Yard	None required.	None required.
Rear Yard	None required.	None required.

Table III-2
Development Standards for Main Street District

	Existing	Proposed
Density and FAR	The total net floor area of all buildings shall not exceed the total net square footage of the property, or a FAR, of 1.0:1. i) Commercial. -The total net floor area of all buildings, excluding residential floor area, shall not exceed the total net square footage of the property, or a FAR, of 1.0:1. ii) Residential -The maximum residential density shall not exceed one dwelling unit per 3,500 square feet of lot area. If the lot is less than 3,500 square feet, one unit is allowed.	No limit.
Minimum Unit Size	No minimum required.	250 square feet.
Parking Location	Parking should be located behind the building or in off-site parking facilities, not within the front setback or in front of buildings.	1. Alley access required. 2. Parking shall be provided in the rear of the site, or off-site via in-lieu fee or shared parking agreement per ESMC.
Parking Requirements	All provisions of Section VII, Parking of the current Specific Plan must be met.	Refer to Section H. Supplemental Area-Wide Standards and Guidelines, Parking.
Residential Private Open Space Per Unit	None required.	50 square-feet.
Residential Common Open Space Per Unit	None required.	25 square-feet designed as an active or passive common space amenity. Rooftop decks may satisfy this requirement.
Residential Recreation Facility Per Unit	None required.	None required.
Building Height	Structures may not exceed 30 feet (and two stories) in front. A 45-foot (and three-story) limit begins 25 feet from front property line.	1. 30 feet maximum at front property line. 2. 45 feet maximum, 10 feet from front property line. 3. 45 feet maximum at rear property line. 4. Height shall be calculated from existing grade at the adjacent property line. 5. See Section 15-2-3 of the ESMC for exceptions to building height.
Plate Height	No minimum required.	14 feet minimum for ground floor commercial use.
First-Floor Glazing Facing Main Street	1. 50 percent minimum transparency for storefront windows. Reflective glass is prohibited. 2. At least 75 percent of the façade between 2 and 8 feet above the sidewalk must be transparent windows and doors.	1. 45 percent minimum transparency for first-floor front façade. 2. At least 75 percent of the façade between two and eight feet above the sidewalk shall be glazing. 3. Refer to Section H.2 Supplemental Area-Wide Standards and Guidelines for additional requirements.

Table III-2
Development Standards for Main Street District

	Existing	Proposed

[1] *In-lieu fees allow a project proponent to pay a specified fee to the lead agency instead of meeting an on-site parking requirement.*
Source: Proposed Downtown Specific Plan Update, Chapter 2, Section D.2 (Development Standards); Chapter 3 Section B (Pedestrian Network); and Chapter 4, Section E (Landscaping); City of El Segundo, 2023.

(b) Richmond Street District

The Specific Plan Update vision for the Richmond Street District is centered on fostering an eclectic mixed-use environment that enhances the existing "old town" character of the area by upgrading street furnishings, landscaping, and amenities and placing professional office, real estate, and residential uses at the street edge. As shown in **Table III-3, Development Standards for Richmond Street District**, the following site development standards would ensure intentional site planning and design.

Table III-3
Development Standards for Richmond Street District

	Existing	Proposed
Building Placement and Orientation	1. New construction on the first floor shall be built to or near the front and streetside property lines throughout Downtown. 2. Parallel parking in both directions will remain.	1. Building shall be oriented toward Richmond Street. 2. Required on-site parking shall not be located between the building and the Richmond Street property line.
Lot Area	*Richmond Street, North Richmond, and West Grand Avenue* 3,500 square feet minimum. *Grand Avenue* Existing lots under common ownership should be developed under a common cohesive plan, as one parcel, not as each original 25-foot wide lot.	5,000 square feet minimum.
Lot Width	25 feet minimum for new lots.	25 feet minimum for new lots.
Setbacks Front/Street Adjacent Yard	There shall be no setback between a building and the front and streetside property lines on the street level, except pedestrian-oriented plazas or architectural features, up to 10 feet in depth, may be placed between the building and the street, subject to design review.	1. Zero setback at ground floor maximum. 2. 10 feet maximum permitted for pedestrian-oriented plazas, outdoor dining, or residential common open space, subject to design review.

Table III-3
Development Standards for Richmond Street District

	Existing	Proposed
Side Yard	*Richmond Street, North Richmond, and Grand Avenue* None required. *West Grand Avenue* 0 setback allowed but 10' if abutting residential zone.	None required.
Rear Yard	*Richmond Street, North Richmond, and Grand Avenue* None required. *West Grand Avenue* 0 setback allowed but 10' if abutting residential zone.	None required.
Density and FAR	The total net floor area of all buildings, excluding residential floor area, shall not exceed the total net square footage of the property, or a FAR, of 1.0:1, except as provided in Strategic Sites. i) Commercial. -The total net floor area of all buildings, excluding residential floor area, shall not exceed the total net square footage of the property, or a FAR, of 1.0:1. ii) Residential -The maximum residential density shall not exceed one dwelling unit per 3,500 square feet of lot area. If the lot is less than 3,500 square feet, one unit is allowed.	No limit.
Minimum Unit Size	No minimum required.	250 square feet
Parking Location		1. Alley access required. 2. Parking shall be provided in the rear or off-site via in-lieu fee [1] or shared use agreement per ESMC.
Parking Requirements	All provisions of Section VII, Parking of the current Specific Plan must be met.	Refer to Section H. Supplemental Area-Wide Standards and Guidelines, Parking.
Open Space	None required.	All required common open space must: a. be physically or visually accessible to the residents, b. be a minimum of five feet in both length and width, and c. include a minimum of 50 percent of landscaping.

Table III-3
Development Standards for Richmond Street District

	Existing	Proposed
Residential Private Open Space Per Unit	No minimum required.	50 square feet
Residential Common Open Space Per Unit	No minimum required.	25 square feet designed as an active or passive common space amenity. Rooftop decks may satisfy this requirement.
Residential Recreation Facility Per Unit	None required.	None required.
Building Height	*Richmond Street and North Richmond* Structures may not exceed 30 feet (and two stories) in front. A 45-foot (and three-story) limit begins 25 feet from front property line. Maximum height on corner lots shall be determined through the Downtown Design Review process. *Grand Avenue* Structures may not exceed 30 feet (and two stories) in front. A 45-foot (and three-story) limit begins 25 feet from front property line. A variety of building heights must be provided throughout the site. Towers or appendages may be located on the corner of Grand Avenue and the alley, and the northwest side of the property abutting Richmond Street, and may be 45 feet (and two stories) tall. Maximum height on corner lots shall be determined through the Downtown Design Review process. *West Grand Avenue* New structures must be between 25 30 feet (two stories) in front. A 36-foot height limit begins 25 feet from front property line. Maximum height on corner lots shall be determined through the Downtown Design Review process.	1. 45 feet maximum. 2. Height shall be calculated from existing grade at the adjacent property line. 3. See ESMC Section 15-2-3 for exceptions to building height.
Plate Height	No minimum required.	14 feet minimum for ground floor commercial use.
First-Floor Glazing Facing Main Street	1. 50 percent minimum transparency for storefront windows. Reflective glass is prohibited. 2. At least 75 percent of the façade between 2 and 8 feet above the sidewalk must be transparent windows and doors.	1. 30 percent minimum transparency for first-floor front façade. 2. The bottom of first-floor window glazing shall not be higher than three feet above the adjacent sidewalk. 3. Refer to Section H.2 Supplemental Area-Wide Standards and Guidelines for additional requirements.

Table III-3
Development Standards for Richmond Street District

	Existing	Proposed

[1] *In-lieu fees allow a project proponent to pay a specified fee to the lead agency instead of meeting an on-site parking requirement.*

Source: Proposed Downtown Specific Plan Update, Chapter 2, Section E.2 (Development Standards); Chapter 3 Section B (Pedestrian Network); and Chapter 4, Section E (Landscaping); City of El Segundo, 2023.

(c) Grand Avenue District

The Specific Plan Update vision for the Grand Avenue District is centered on supporting a vibrant Downtown by adding residential and office uses permitted in at higher densities and located in the ground floors. As shown in **Table III-4, Development Standards for Grand Avenue District**, the following site development standards would ensure intentional site planning and design.

Table III-4
Development Standards for Grand Avenue District

	Existing	Proposed
Building Placement and Orientation	1. New construction on the first floor shall be built to or near the front and streetside property lines throughout Downtown. 2. Surface parking within the District shall be discouraged, adjacent and shared parking encouraged, and subterranean and/or semi-subterranean parking highly recommended.	1. Building shall be oriented toward Grand Avenue and/or Main Street.
Lot Area	3,500 square feet minimum.	10,000 square feet minimum.
Lot Width	25 feet minimum for new lots.	1. 100-foot frontage minimum for new lots. 2. Individual lots less than 100 feet of frontage, and under common ownership with a neighboring lot, shall submit a comprehensive development application. including all parcels within the minimum lot width criteria.
Setbacks Front/Street Adjacent Yard	There shall be no setback between a building and the front and streetside property lines on the street level, except pedestrian-oriented plazas or architectural features, up to 10 feet in depth, may be placed between the building and the street, subject to design review.	None required.
Side Yard	0 setback allowed.	None required.
Rear Yard	0 setback allowed.	None required.

Table III-4
Development Standards for Grand Avenue District

	Existing	Proposed
Density and FAR	The total net floor area of all buildings, shall not exceed the total net square footage of the property, or a FAR, of 1.0:1. i) Commercial. -The total net floor area of all buildings, excluding residential floor area, shall not exceed the total net square footage of the property, or a FAR, of 1.0:1. ii) Residential -The maximum residential density shall not exceed one dwelling unit per 3,500 square feet of lot area. If the lot is less than 3,500 square feet, one unit is allowed.	No limit.
Minimum Unit Size	None required.	250 square feet.
Access	(i) Safe and convenient pedestrian access shall be provided between buildings and sidewalks, or modes of transportation, and between buildings for multi-building projects. (ii) Access must be from the alley or side street, except for access to handicapped parking stalls if approved through the design review process.	1. A maximum of one vehicle access point shall be provided from Grand Avenue. Additional access may be provided from alley or side streets. 2. Provide adequate access and facilities for various modes of transit, as required by the City's Transportation Demand Management Program in ESMC Chapter 15-16. 3. Provide pedestrian access between buildings and transit facilities located on site and/or off site, if within adjoining public rights-of-way. If the building is part of a multi-building development project, then safe and convenient pedestrian access shall be provided between buildings.
Parking Location	Parking should be located behind the building or in off-site parking facilities, not within the front setback or in front of buildings.	1. Surface parking areas shall not be located adjacent to Grand Avenue or Main Street. Surface parking areas shall be located behind the building. 2. Parking structures shall incorporate first floor commercial or residential lobby when fronting Grand Avenue or Main Street. Access to parking structures is permitted from Main Street.
Parking Requirements	All provisions of Section VII, Parking of the current Specific Plan must be met.	1. A minimum of 75 percent of parking shall be required on-site. Any parking not provided on-site shall be satisfied via an in-lieu fee or shared parking agreement per ESMC. 2. Refer to Section H. Supplemental Area-Wide Standards and Guidelines, Parking.

Table III-4
Development Standards for Grand Avenue District

	Existing	Proposed
Open Space	None required.	1. Shall not be achieved by the utilization of parking areas, driveways, service areas. 2. Interior side and rear setbacks may be considered as required open spaces and recreation facilities. 3. Up to 50 percent may be satisfied within a rooftop deck. 4. All required common open space shall: a. be physically or visually accessible to the residents, b. be a minimum of 15 feet in both length and width, c. include a minimum of 50 percent of softscape landscaping, and d. include seating, as well as other pedestrian amenities, such as decorative lighting, planters, fountains or water features, distinctive paving, public art, landscaping, and bicycle racks.
Residential Private Open Space Per Unit	No minimum required.	50 square feet.
Residential Common Open Space Per Unit	No minimum required.	100 square feet designed as an active or passive common space amenity.
Residential Recreation Facility Per Unit	No minimum required.	30 square feet.
Landscaping	Landscaping: All provisions of Section 20.12.170, Landscaping, of the El Segundo Municipal Code and Section VIII, Design Standards, must be met.	1. 10 percent minimum of the lot area. 2. Up to 1/3 of the required landscape area may be hardscape or plaza. Parking is not permitted within this area. 3. 10 percent of the required landscape area can be met through use of pervious paving, and may include parking in this area. This pervious paving is in addition to the hardscape or plaza area listed above. 4. Landscaping must be provided as required by ESMC Section 15-2-14 and Chapter 15-15A.

Table III-4
Development Standards for Grand Avenue District

	Existing	Proposed
Building Height	Structures may not exceed 30 feet (and two stories) in front. A 45-foot (and three-story) limit begins 25 feet from front property line. A variety of building heights must be provided throughout the site. Towers or appendages may be located on the corner of Grand Avenue and the alley, and the northwest side of the property abutting Richmond Street, and may be 45 feet (and two stories) tall. Maximum height on corner lots shall be determined through the Downtown Design Review process.	1. 60 feet maximum, with the exception for properties with frontage along Main Street. 2. For properties fronting on Main Street height limit will be as follows: a. 30 feet maximum at front property line. b. 45 feet maximum, 10 feet from front property line. c. 45 feet maximum at rear property line. 3. Height shall be calculated from existing grade at the adjacent property line. 4. See ESMC Section 15-2-3 for exceptions to building height.
Plate Height	No minimum required.	14 feet minimum for ground floor commercial use.
First-Floor Glazing Facing Main Street	1. 50 percent minimum transparency for storefront windows. Reflective glass is prohibited. 2. At least 75 percent of the façade between 2 and 8 feet above the sidewalk must be transparent windows and doors.	1. 30 percent minimum transparency for first-floor front façade. 2. The bottom of first-floor window glazing shall not be higher than three feet above the adjacent sidewalk. 3. Refer to Section H.2 Supplemental Area-Wide Standards and Guidelines for additional requirements.

[1] *In-lieu fees allow a project proponent to pay a specified fee to the lead agency instead of meeting an on-site parking requirement.*

Source: Proposed Downtown Specific Plan Update, Chapter 2, Section F.2 (Development Standards); Chapter 3 Section B (Pedestrian Network); and Chapter 4, Section E (Landscaping); City of El Segundo, 2023.

(d) Civic Center District

The Specific Plan Update vision for the Civic Center District is centered on redesigning gathering spaces for outdoor entertainment and events by reducing lawn areas and adding public uses and activities. As shown in **Table III-5, Development Standards for Civic Center District**, the following site development standards would ensure intentional site planning and design.

Table III-5
Development Standards for Civic Center District

	Existing	Proposed
Building Placement and Orientation		Building shall be oriented toward Grand Avenue and/or Main Street.
Lot Area	3,500 square feet minimum.	None required.
Lot Width	25 feet minimum for new lots.	None required.

Table III-5
Development Standards for Civic Center District

	Existing	Proposed
Setbacks Front/Street Adjacent Yard	There shall be no setback between a building and the front and streetside property lines on the street level, except pedestrian-oriented plazas or architectural features, up to 10 feet in depth, may be placed between the building and the street, subject to design review.	None required.
Side Yard	0 setback allowed.	None required.
Rear Yard	0 setback allowed.	None required.
Density and FAR	i) Commercial -The total net floor area of all buildings, excluding residential floor area, shall not exceed the total net square footage of the property, or a FAR, of 1.0:1. ii) Residential -The maximum residential density shall not exceed one dwelling unit per 3,500 square feet of lot area. If the lot is less than 3,500 square feet, one unit is allowed.	No limit.
Access	(i) Safe and convenient pedestrian access shall be provided between buildings and sidewalks, or modes of transportation, and between buildings for multi-building projects. (ii) Access must be from the alley or side street, except for access to handicapped parking stalls if approved through the design review process.	1. A maximum of one vehicle access point shall be provided from Grand Avenue and from Holly Avenue. 2. Vehicle access from Main Street is not permitted. 3. Access is permitted along Standard and not limited.
Parking Location	No vehicular use area, except driveway access to a property, for any residential use shall be located, in whole or in part, in any required front yard or front two-thirds of any required side yard.	Surface parking areas shall not be located adjacent to Grand Avenue or Main Street. Surface parking areas shall be located behind the building.
Parking Requirements	All provisions of Section VII, Parking of the current Specific Plan must be met.	1. All parking required shall be located on-site or in a designated City parking facility. 2. Refer to Section H. Supplemental Area-Wide Standards and Guidelines, Parking.
Open Space	None required.	Refer to Civic Center District Public Plaza Development Standards in Section G.4.

Table III-5
Development Standards for Civic Center District

	Existing	Proposed
Landscaping	All provisions of Section 20.12.170, Landscaping, of the El Segundo Municipal Code and Section VIII, Design Standards, must be met.	1. 25 percent minimum of the lot area. 2. Up to 75 percent of the required landscape area may be hardscape or plaza. Parking is not permitted within this area. 3. 10 percent of the required landscape area can be met through use of pervious paving, and may include parking in this area. This pervious paving is in addition to the hardscape or plaza area listed above. 4. Landscaping must be provided as required by Section 15-2-14 and Chapter 15-15A of this title.
Building Height	Structures may not exceed 30 feet (and two stories) in front. A 45-foot (and three-story) limit begins 25 feet from front property line. A variety of building heights must be provided throughout the site. Towers or appendages may be located on the corner of Grand Avenue and the alley, and the northwest side of the property abutting Richmond Street, and may be 45 feet (and two stories) tall. Maximum height on corner lots shall be determined through the Downtown Design Review process.	1. 60 feet maximum. 2. Height shall be calculated from existing grade at the adjacent property line. 3. See ESMC Section 15-2-3 for exceptions to building height.
Plate Height		No minimum required.
First-Floor Glazing Facing Main Street	1. 50 percent minimum transparency for storefront windows. Reflective glass is prohibited. 2. At least 75 percent of the façade between 2 and 8 feet above the sidewalk must be transparent windows and doors.	1. All glazing facing Main Street and Grand Avenue shall be transparent glass which provides a minimum visibility of light transparency/transmittance level of 50 percent. 2. Refer to Section H.2 Supplemental Area-Wide Standards and Guidelines for additional requirements.

Source: Proposed Downtown Specific Plan Update, Chapter 2, Section F.2 (Development Standards); Chapter 3 Section B (Pedestrian Network); and Chapter 4, Section E (Landscaping); City of El Segundo, 2023.

(4) Public Realm – Multimodal Mobility Improvements

In addition to land use and zoning changes, the Specific Plan Update would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would create potential changes to the travel lanes on those streets. The opportunities presented within the Multimodal Mobility section could enhance the comfortability of walking, biking, and taking transit, to create a Downtown El Segundo in which community and atmosphere is emphasized in addition to vehicular mobility.

(a) Pedestrian Network

The Specific Plan Update would include improvements to the pedestrian network focusing on access and comfortability on both sidewalks and at roadway crossings including adding stable, firm, smooth and slip resistant sidewalks, keeping a clear path of any fixtures and/or obstructions along sidewalks, providing a buffer between pedestrians and moving vehicles, integrating streetscape amenities, adding mirrors to key driveway exits to increase visibility of pedestrians, and upgrading curb cuts to ADA-compliant curb ramps, and installing enhanced paving at crosswalks. Widened sidewalks would provide expanded outdoor seating and dining areas for area restaurants.

Pedestrian crossings are currently provided throughout Downtown, at both intersections and at some midblock locations. There are four midblock crosswalks, all located on Main Street. These four crosswalks are proposed to be improved with installation of pedestrian signals, raised crosswalks for better visibility, decorative paving to increase their visibility, and upgrade of ramps to meet ADA compliance.

The Specific Plan area has existing pedestrian paseos[1] at Handprint Alley, located between Main Street and Marketplace Alley, and Butterfly Lane Alley, located between Main Street and the alleyway west of Standard Street. These paseos would be enhanced with paseo improvements such as consistent use of vertical elements within the streetscape, with wayfinding signage, accent lighting, seating areas, landscaping, and decorative paving at the entries on Main Street to provide increased visibility.

(b) Bicycle Circulation

The Specific Plan Update proposes the enhancement of east-west bicycle facilities through Downtown to connect bike lanes, providing improved bicycle mobility between Downtown and other points of interest in the City. The Specific Plan Update also proposes improved bicycle comfortability to the Class III bicycle route along Main Street and Grand Avenue, without compromising direct access to these points of interest, and enhanced bicycle wayfinding signage. A bicycle hub, potentially including a repair station and consisting of a gated area with controlled access, could be installed in a parking structure for more secure and longer-term bicycle parking.

(c) Public Transit

The Specific Plan Update includes the following improvements to transit service to enhance mobility to, from, and within Downtown El Segundo: coordinate with Beach Cities Transit on their ongoing short-range transportation plan (specifically in regard to Line 109), provide additional transit shelters at existing Downtown bus stops where space allows, include bench and waste bins at existing bus stops, and increase bus zone lengths where feasible.

[1] *Paseos are pedestrian-only pathways that provide opportunities to create unique public spaces.*

(d) Vehicular Circulation

The Specific Plan Update would propose improvements of vehicular circulation focusing on multi-modal operations at intersections and placemaking considerations along roadway segments. Figures illustrating the preferred and alternative concepts are included in Chapter 3 of the Specific Plan (**Appendix B** of this EIR).

(i) Main Street

The Specific Plan Update preferred concept would involve enhanced pedestrian comfort and outdoor dining opportunities along Main Street, with wider sidewalks and parklets, while upgrading the existing Class III bike route "sharrows" to a Class II bike lane. This concept involves the maintenance of parallel parking spaces on both sides of the street and widening of sidewalks and/or installation of permanent parklets. This would maintain the current number of parking spaces along the corridor, while allowing for improved bicycle facilities and wider sidewalks.

An alternative concept envisions enhanced cyclist comfort with Class II buffered bike lanes. The Bicycle Mobility Emphasis would maintain a similar parking supply along Main Street as exists today, with parallel parking provided on both sides of the street, while the sidewalk width would remain the same.

Main Street has in-road bollards that allow for temporary street closures for special events, such as the Farmer's Market. To continue serving Specific Plan Update objectives, including promoting a "village" character and a pedestrian friendly environment, this flexibility for temporary street closures would be maintained.

(ii) Grand Avenue

The Specific Plan Update preferred concept envisions enhanced pedestrian comfort and outdoor dining opportunities, with wider sidewalks and parklets, while maintaining the existing Class III bike route "sharrows". This concept involves the conversion of parallel parking spaces on both sides of the street and along both sides of the median to angled parking to allow for wider sidewalks and parklets and includes a widened central median. Implementing this parking modification would lead to a net reduction of around 10 to 20 percent of the existing parking spaces along the corridor.

Two Bicycle Mobility Emphasis alternatives were developed for Grand Avenue that provide enhanced cyclist comfort through the creation of dedicated bicycle facilities: Class II bike lanes or a Class IV protected bikeway (Cycle-Track). The Class II option would have about 50 percent reduction in parking, and the Cycle-Track concept would have about a 10 percent to 20 percent reduction in spaces.

(iii) Richmond Street

The Specific Plan Update preferred concept for the area between Franklin Avenue and Grand Avenue envisions enhanced pedestrian comfort and expanded outdoor dining opportunities with wider sidewalks and parklets and the continuation of two existing travel lanes. This concept would

result in the removal of all parking spaces on this portion of the street and assumes a future parking structure would be developed adjacent to Richmond Street. The Sidewalk Parklets concept for Richmond Street would provide similar vehicular capacity to the existing road section. This roadway configuration would be supplemented by occasional and/or periodic street closures utilizing in-road bollards (similar to those used on Main Street) to accommodate special events.

An alternative concept, the Pedestrian Mall concept between Franklin Avenue and Grand Avenue, envisions enhanced pedestrian comfort and expanded outdoor dining opportunities with wider sidewalks and the permanent removal of vehicular travel lanes to allow for an expanded permanent parklet area with increased gathering opportunities. The Pedestrian Mall concept would result in the removal of all parking spaces on this portion of the street and assumes a future parking structure would be developed adjacent to Richmond Street. The Pedestrian Mall concept for Richmond Street would permanently restrict vehicular traffic in this portion of the street, except for emergency vehicle access.

(e) Alley Enhancements

The Specific Plan Update envisions installation of public art, street trees and landscape enhancements, entry elements such as decorative paving, trash and recycling receptacle consolidation and concealment, seating areas, directional signage and signage for key landmarks, and lighting and façade enhancements.

(f) Parking Strategies

The Specific Plan Update would include modifications to parking standards and strategies, alternatives for on-street parking, and two new parking structures at the northwest corner of Grand Avenue and Standard Street and the northeast corner of Richmond and Franklin.

(i) On-Street Parking

The Specific Plan Update would allow for optimization of parking supply and demand in the Downtown area through either striping all available parallel parking spaces with delineation lines to minimize inefficient parking behavior, re-striping parking spaces to be “back-in” to increase driver visibility of cyclists and other vehicles while exiting parking spaces, or potentially converting parallel parking spaces to angled parking spaces where there is enough room in the right-of-way.

The proposed streetscapes for Grand Avenue, Main Street, and Richmond Street, illustrated in Section (d), Vehicular Circulation, have varying effects on the on-street parking supply on those streets. Implications on parking supply for each proposed streetscape are summarized in **Table III-6, On-Street Parking Supply Comparison**.

Table III-6
On-Street Parking Supply Comparison

Roadway Corridor	Corridor Extent	Existing Corridor Parking Supply	Streetscape Concept	Approximate Corridor Parking Supply with Streetscape Concept
Main St.	El Segundo Blvd. to Mariposa Ave.	108	Preferred Road Section (Pedestrian Mobility Emphasis-Class II or III)	108
			Alternative Road Section (Bicycle Mobility Emphasis-Class II)	108
Grand Ave.	Concord St. to Eucalyptus St.	100	Preferred Road Section (Pedestrian Mobility Emphasis-Class III)	80-90
			Alternative Road Section (Bicycle Mobility Emphasis-Class II)	50
			Alternative Road Section (Bicycle Mobility Emphasis-Cycle-Track)	80-90
Richmond St.	Franklin Ave. to Grand Ave.	32	Preferred Road Section (Sidewalk Parklets)	0
			Alternative Road Section (Pedestrian Mall)	0
Source: Proposed Downtown Specific Plan Update, Section 3.G, City of El Segundo, 2023.				

(ii) Off-Street Parking

The Specific Plan Update envisions strategies to optimize parking supply and demand in the Downtown area including implementation of shared-parking programs, development of informational programs for drivers to direct parkers quickly, incorporation of enhanced wayfinding signage for the existing public parking structure at the corner of Richmond Street and Grand Avenue, and installation of dynamic "spaces available" sign system. Additionally, the Specific Plan would allow for two new parking structures: one at the northeast corner of Richmond Street and Franklin Avenue and another at the northwest corner of Grand Avenue and Standard Street.

(5) Public Realm – Placemaking and Beautification

The Public Realm – Placemaking and Beautification chapter would address street design elements, landscaping, furnishings, lighting, gateway entry treatments, public art, and other unique public realm features within Downtown El Segundo.

(a) Gateway and Wayfinding Signage

The Specific Plan Update would create a cohesive signage program, which includes a logo, gateways and decorative entry treatments, directional wayfinding signs (vehicular and pedestrian-oriented), and banners to provide consistency and unity within the Downtown area. This would be achieved through colorful, prominently placed, gateway signage, that includes enhanced decorative paving and ornamental landscaping, vehicular directional signs that include common directional arrows and labeling oriented to vehicular traffic, providing local residents and visitors information such as proximity to bus stops and notable landmarks, and pedestrian wayfinding signage that navigates pedestrians through the Downtown area in the form of directional kiosks and cohesive wayfinding signage.

(b) Streetscape Design and Pedestrian Amenities

The Specific Plan concept would change the predominant character of the area from an auto-oriented environment to a pedestrian-oriented Downtown, and distinctive design treatments and pedestrian amenities would create the character and sense of place and create an easily identifiable and distinctive Downtown core. This would be achieved through amenities placed within the public right-of-way, such as decorative streetlights with banners, benches, trash and recycling containers, bicycle racks, and bollards to define special edge conditions, and special attractions at select locations such as public art and other focal elements.

(c) Public Art

The Specific Plan Update suggests public art in the following locations: key intersections and entries; accent focal points in alleyways, paseos, and plazas; and primary bus shelters, parklets, and major bicycle parking areas. Art and focal points placed within the Downtown area should represent the community, showcase the culture and history of El Segundo, and/or capture or reinforce the unique character of place.

(d) Landscaping

The Specific Plan would encourage landscaping layered with a variety of shapes, textures, and colors and utilize drought tolerant and California native plants to reduce irrigation and conserve water. Tree species would be selected for suitability within the Downtown area and the specific area to be planted. The overall selection of tree species should be based upon the tree's overall ability to provide pedestrian-friendly benefits, such as shade from summer heat, storefront visibility and general aesthetics which contribute to a vibrant downtown. Sidewalk parkway planting would include shrubs and groundcovers within a variety of configurations such as planter pots, landscaped planters/parkways, raised planters, plaza landscaping, and parking lot screening and shading. To achieve a cohesive appearance and maintain the urban landscape, joint participation between private property owners and the City would be required. El Segundo Blue Butterfly habitat is encouraged at sheltered and less traveled areas of the Downtown and is suggested at the Civic Center Plaza.

(6) Infrastructure and Public Facilities

There are no specific improvements proposed related to water supply, wastewater services, or stormwater infrastructure in the Specific Plan. No new public facilities, including police or fire protection facilities are proposed in the Specific Plan.

6. Project Objectives

State CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives for the Project. The objectives assist the City in developing a reasonable range of alternatives to be evaluated in the EIR. The Project objectives also aid decision makers in preparing Findings of Fact and a Statement of Overriding Considerations, if necessary. The statement of objectives

also is to include the underlying purpose of a project and may discuss a project's benefits. The Project's specific objectives are as follows:

(1) To provide an Update to the Adopted Downtown Specific Plan that will guide the future development of the Specific Plan area and provide land use and development standards, identify improvements in the public realm, and provide a plan for infrastructure and public services to accommodate potential development.

(2) To promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing.

(3) To attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers.

(4) To promote a range of housing options with opportunities for all incomes.

(5) To improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.

7. Intended Uses of this EIR

In compliance with CEQA, this Draft EIR has been prepared to analyze the potential environmental impacts that may result from implementation of the Project. This Draft EIR also identifies feasible mitigation measures and/or alternatives that would minimize or eliminate the potential significant impacts associated with the Project. Lead agencies, such as the City, are charged with the duty to substantially lessen or avoid significant environmental effects where feasible (*State CEQA Guidelines* Sections 15002[a][3] and 15021[a][2]). Where a lead agency identifies unavoidable adverse environmental effects of a project, *State CEQA Guidelines* Section 15093 authorizes the agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable adverse environmental effects when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits outweigh the unavoidable adverse environmental effects, these effects may be deemed acceptable by the agency as substantiated in a statement of overriding considerations.

This Draft EIR evaluates potential environmental impacts associated with implementation of the Project and provides information regarding short-term, long-term, direct, indirect, and cumulative environmental effects of the Project. The Draft EIR must allow the City, responsible agencies, and other interested parties, to evaluate the environmental impacts of Project implementation and the environmental consequences of Project implementation, thereby enabling them to make informed decisions regarding the requested entitlements, as described below.

8. Requested Actions

The following is a summary of actions the City of El Segundo will consider:

- Adoption of the El Segundo Downtown Specific Plan Update
- Certification of the EIR
- Approval of General Plan Amendments
- Approval of Zone Text Amendments
- Approval of Zone Changes

IV. Environmental Impact Analysis

A. Aesthetics

1. Introduction

This section describes the existing visual and aesthetic conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on Project area reconnaissance, satellite imagery from the Google Earth computer program, the City of El Segundo General Plan, the California Department of Transportation (Caltrans) Scenic Highway System, and the Specific Plan Update. Other sources consulted are listed in **Section IV.A.8, References**, below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

This section describes the existing conditions in the Project area and identifies the resources that could be affected by the Project.

a) Regional Conditions and Land Uses

The Project Site is located in the Airport/South Bay subregion of Los Angeles County in the City of El Segundo (City) and is located at the southwestern edge of the Los Angeles coastal basin. Los Angeles International Airport in the City of Los Angeles is located immediately north of the City. The Los Angeles residential areas of Playa del Rey and Westchester are located just north of Los Angeles International Airport. To the east is the Los Angeles County community of Del Aire, as well as the City of Hawthorne; both areas are predominantly residential. Commercial land uses in the City of Hawthorne line Aviation Boulevard. The City of Manhattan Beach is located directly south of the City. The Chevron Refinery is located in the southern portion of El Segundo, between the City's residential areas and the City of Manhattan Beach. To the west of the City is the Pacific Ocean. A majority of the coastline is owned by the City of Los Angeles, which operates two facilities within this area: the Hyperion Sewage Treatment Plant, currently undergoing an expansion, and the Los Angeles Department of Water and Power Scattergood Generating Station. A small portion of the coastline, 0.8 miles, is within City limits. The Los Angeles Department of Water and Power Scattergood Generating Station and a coastal portion of the Chevron Refinery are located along this portion of the shoreline. The Chevron Refinery occupies

approximately one-third of the City and is adjacent to the beach, along with other industrial land uses.[1]

The City is almost entirely built out and mostly contains ornamental vegetation. Despite dense urbanization, there are a number of scenic resources in the broader Los Angeles County, including mountains, foothills, ridgelines, forests, deserts, beaches, and coastlines. Scenic resources visible in the vicinity of the Project Site include the elevated terrain of the Santa Monica Mountains to the north, San Gabriel Mountains to the north/northeast, and the beaches and coastline to the west. Additionally, Pacific Coast Highway (PCH) bisects the City in a north/south direction. PCH is a Caltrans facility, also known as State Route 1, which connects the coastal cities of Los Angeles County to other coastal communities in northern and southern California and provides opportunities to view the coastline south of the Project Site in the City of Manhattan Beach or north of the Project Site in the City of Los Angeles.

b) Surrounding Land Uses

The Specific Plan Update area is surrounded by a variety of land uses, including residential, recreational, and commercial retail uses. **Figures II-2 through II-4 in Section II, Environmental Setting** depict views of surrounding land uses.

- **Land Uses to the North**: Land uses to the north include El Segundo High School, El Segundo Library, and Library Park located on Main Street. Neighborhoods surrounding these civic uses are comprised mainly of single-family dwellings, duplexes, and apartment complexes. Public Facilities (P-F) Zone and Open Space (O-S) Zone are located adjacent to the Project Site.

- **Land Uses to the East**: Neighborhoods to the east are comprised of a mix of single-family dwellings, duplexes, and apartment complexes. Areas southeast of the Project area contain the Smoky Hollow Specific Plan area and are developed with light industrial and office uses. El Segundo Recreation Park, located along Pine Avenue and Eucalyptus Drive, provides recreational facilities for a range of sports, including softball, roller hockey, tennis, and basketball. Properties to the east of the Project Site are zoned Two-Family Residential (R-2), Parking (P), Multi-Family Residential (R-3), Neighborhood Commercial (C-2), and Smoky Hollow West (SHW).

- **Land Uses to the South**: The Chevron Refinery is south of El Segundo Boulevard. The Chevron Refinery is zoned Heavy Industrial (M-2) and covers over 1,000 acres of land.

- **Land Uses to the West**: The Pacific Ocean is less than a mile from the western edge of the Specific Plan Update area. The neighborhoods between Downtown El Segundo and the coast are comprised mainly of single-family dwellings, duplexes, and apartment

[1] *City of El Segundo. 1992a. City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992. https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed March 2023.*

complexes. Land uses to west are zoned as Neighborhood Commercial (C-2) along Grand Avenue, Multi-Family Residential (R-3), and Two-Family Residential (R-2).

c) Project Site

The Specific Plan Update area (or "Project area") is in Downtown El Segundo, in the northwest quadrant of the City, which is approximately 20 miles southwest of downtown Los Angeles. Downtown El Segundo is located southwest of the interchange of Interstate 405 Freeway (I-405) and State Route 90 (Imperial Highway), west of Pacific Coast Highway and north of El Segundo Boulevard. Interstate 105 Freeway (I-105) is north of the Specific Plan area, immediately north of Imperial Highway.

The Project area is approximately 43.8 acres in size. The Project area is irregular in shape with portions extending to Eucalyptus Drive to the east, El Segundo Boulevard to the south, Concord Street to the west, and Mariposa Avenue to the north. Los Angeles International Airport (LAX) is located to the north; the Los Angeles County community of Del Aire and the City of Hawthorne are located to the east; the City of Manhattan Beach is located to the south; and the Hyperion Sewage Treatment Plant, Dockweiler Beach, and the Pacific Ocean are located to the west.

Existing development within the Specific Plan Update area ranges from one- to three-story buildings, with many buildings located along or near the front property line at one to two-story heights and a few two- to three-story buildings. The Specific Plan area is generally gently sloping with some steeper topography along portions Main Street and the Marketplace Alley. **Figures II-6 through II-9 in Section II, Project Description,** depict views of the Project Site.

d) Scenic Highways

According to Caltrans, the County of Los Angeles has two officially designated state scenic highways and 11 eligible scenic highways.[2] Route 1 and Route 27, the County of Los Angeles's two designated scenic highways, are located approximately 6.0 miles northwest and approximately 21 miles northwest of the Project area, respectively. Route 1, an eligible scenic highway that extends north and south along the coast. None of Los Angeles County's officially designated or eligible scenic highways are visible from the Project area, nor is the Project area visible from the highways. Further, there are no state designated scenic highways within City boundaries.[3]

e) Scenic Vistas

Scenic vistas include specific locations where natural landscapes form views of unique flora, geologic, or other natural features that can be viewed free from urban intrusions, or lands

[2] *Caltrans (California Department of Transportation). 2019. "List of Eligible and Officially Designated State Scenic Highways (XLSX)." August 2019. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed March 2023.*

[3] *Caltrans (California Department of Transportation). 2019. "List of Eligible and Officially Designated State Scenic Highways (XLSX)." August 2019. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed March 2023.*

designated as scenic vistas by a local, State, or federal agency. Typical scenic vistas include views of mountains and hills, uninterrupted open spaces, and water features. The City of El Segundo General Plan identifies natural resource areas for protection such as beach areas, city parks, scenic corridors, and utility easements on lands used for outdoor recreation. There are no scenic vistas within the Specific Plan Update area.

f) Light and Glare

The Project area is located in a highly developed area and contains commercial, residential, and public land uses that produce light sources from interior lighting and glare from signage and glass windows. Buildings and structures with glass, metal, and polished exterior or roofing materials contribute to localized sources of glare. Exterior light sources, such as lighted walkways in outdoor areas and landscape accent lighting, are typically common on higher volume commercial properties in the area.

3. Relevant Plans, Policies, and Ordinances

a) Federal

There are no federal regulations pertaining to aesthetics and scenic resources that would apply to the proposed Project.

b) State

(1) California Scenic Highway System

Created by the California State Legislature in 1963, the California Scenic Highway Program includes highways designated as scenic by Caltrans. The purpose of the program is to protect the scenic beauty of California highways and adjacent corridors through conservation and land use regulation.

(a) Title 24-California Code of Regulations

Title 24, California Building Standards Code, consists of regulations to control building standards throughout the state. The following components of Title 24 include standards related to lighting.

Title 24, Part 1 – California Building Code and Title 24, Part 3 – California Electrical Code

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress.

Title 24, Part 6 – California Energy Code

The California Energy Code (Title 24, Part 6) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy

consumption through efficient and effective use of lighting equipment. Section 130.2 sets forth requirements for outdoor lighting controls and luminaire cutoff requirements. This requirement does not apply to streetlights for the public right-of-way, signs, or building facade lighting.

Section 140.7 establishes outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by the Lighting Zone, as defined in Section 10-114 of the California Energy Code. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Facade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

Section 130.3 stipulates sign lighting controls with any outdoor sign that is on during both day and nighttime hours must include a minimum 65 percent dimming at night. Section 140.8 of the California Energy Code sets forth lighting power density restrictions for signs.

(b) California Vehicle Code

Chapter 2, Article 3 of the California Vehicle Code stipulates limits to the location of light sources that may cause glare and impair the vision of drivers. Chapter 2, Article 3, Offenses Relating to Traffic Devices (21450–21468) (Article 3 enacted by Stats. 1959, Ch. 3.), Section 21466.5 states: "No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway."

(2) Regional and Local

(a) City of El Segundo General Plan

The City adopted its General Plan on December 1, 1992. A General Plan is intended to provide direction for future development of the City. It represents a formal expression of community goals and desires, provides guidelines for decision making about the City's development, and fulfills the requirements of California Government Code Section 65302, requiring local preparation and adoption of General Plans. The General Plan includes the following mandated and optional elements: Economic Development Element, Land Use Element, Circulation Element, Housing Element, Open Space and Recreation Element, Conservation Element, Air Quality Element, Noise Element, Public Safety Element, and Hazardous Materials and Waste Management Element. According to the Land Use Element, buildout projections for the 1992 General Plan

analyzed trends until 2010. Goals and policies related to aesthetics and scenic resources in the City's General Plan that may be applicable to the Project are identified below.[4,5,6]

Land Use Element

Goal LU1: **Maintenance of El Segundo's "Small Town":** Maintain El Segundo's "small town" atmosphere, and provide an attractive place to live and work.

Policy LU1-1: Preserve and maintain the City's low-medium density residential nature, with low building height profile and character, and minimum development standards.

Policy LU4-2.1: Revitalize and upgrade commercial areas, making them a part of a viable, attractive, and people-oriented commercial district. Consideration should be given to aesthetic architectural improvements, zoning, and shopper amenities.

Conservation Element

Goal CN5: **Urban Landscape:** Develop programs to protect, enhance, and increase the amount and quality of the urban landscape to maximize aesthetic and environmental benefits.

Policy CN5-1: Preserve the character and quality of existing neighborhood and civic landscapes.

Open Space Element

Goal OS1: **Provision and Maintenance of Open Space and Recreation Facilities:** Provide and maintain high quality open space and recreational facilities that meet the needs of the existing and future residents and employees within the City of El Segundo.

(b) El Segundo Municipal Code

The California Building Code, 2016 edition, published at Title 24, Part 2, of the California Code of Regulations, including Appendices F, H, and I, and is adopted by reference pursuant to Chapter 13-1-1 of the City of El Segundo Municipal Code (ESMC).

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4 *City of El Segundo. 1992a. City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992. https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed March 2023.*

5 *City of El Segundo. 1992b. City of El Segundo General Plan, Chapter 7, Conservation Element. Adopted December 1, 1992. https://www.elsegundo.org/Home/ShowDocument?id=370. Accessed March 2023.*

6 *City of El Segundo. 1992c. City of El Segundo General Plan, Chapter 6, Open Space and Recreation Element. Adopted December 1, 1992. https://www.elsegundo.org/Home/ShowDocument?id=364. Accessed March 2023.*

(i) Chapter 15-18, Signs

Chapter 15-18 of the ESMC governs signage and sets forth the requirements for the Master Sign Program, application, and permit. The purpose of this chapter is to encourage the effective use of signs, to help maintain the aesthetic environment and the City's ability to attract businesses, to encourage harmonious integration of signs with their surroundings, to ensure pedestrian and traffic safety, and to minimize possible adverse effects.

(ii) Chapter 9-3, Street Trees

Section 9-3-6 addresses tree removal by individuals. All tree removals from a public street must obtain a tree permit from the City. Permits may be granted if the proposed tree removal would occur under the direction of a certified arborist and completed by a licensed contractor, and tree removal or maintenance must adhere to standards issued by the International Society of Arboriculture. Additionally, the permittee is required to mail notice to homeowners within 50 feet of the tree proposed for removal informing them of the intent and reason for the removal. The persons have 14 days to protest the removal to the recreation and parks commission. Sections 9-3-10 and 9-3-11 address the permit requirements for a tree removal. The City may require that the permittee plant another tree in the place of the one removed or destroyed and that a particular species of tree, as determined by the city's approved street tree list, be used as a replacement (and the director will select the species of tree that may be planted).

(iii) Chapter 15-25, Site Plan Review

A site plan review is a discretionary land use permit that is required for any proposed project that meets the criteria set forth in Section 15-25-2, including multi-family developments of more than 10 units. The purpose of the site plan review process is to ensure that the project is functionally compatible with the area in which it is located, and to allow all City departments the opportunity to review development proposals and place reasonable conditions to ensure that the public health, safety, and welfare are maintained. An application for a site plan review must be accompanied by a site plan showing the location of all structures, landscape and hardscape areas, parking areas, walks, internal circulation, access, adjacent streets, signs, and fence or wall type and placement. Additionally, dimensioned and scaled building elevations for each proposed structure must be provided. The building elevations must show all sides of the building and call out exterior building materials, window and door types, and roof materials.

(c) El Segundo Downtown Specific Plan Update

The Specific Plan Update provides direction for development through regulatory tools and guidelines established to shape the design character envisioned by the community. Based on community input, planning principles shape the guidelines and standards contained in the Specific Plan Update. Planning principles that are implemented through land use and development standards for each district are set forth in the Specific Plan Update. Planning principles that are relevant to aesthetics are listed below.

Private Realm – Land Use and Development Standards

- **Heart of El Segundo** – Embrace the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown and enhance its identity to reflect local interests.
- **Outdoor Dining** – Create aesthetically pleasing and functional outdoor dining opportunities.

Public Realm – Multimodal Mobility

- **Expanded Mobility** – Support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.
- **Pedestrians and Bicycles** – Improve walkability and the pedestrian environment and encourage bicycle use with additional bicycle improvements and amenities.
- **Improved Public Parking** – Develop a comprehensive parking plan with increased parking wayfinding signage and facilitate innovative methods for parking such as shared parking agreements.

Public Realm – Placemaking and Beautification

- **Designate the Core** – Enhance the entrances and gateways into Downtown and develop the Civic Center Plaza as a focal point for the community with activities for all ages.
- **Entertainment and Arts** – Provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing.
- **Streetscape Beautification** – Ensure an enjoyable, comfortable, and beautified public realm with high-quality amenities and additional shaded seating and gathering areas.

4. Environmental Impacts

a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), a project would have a significant impact related to aesthetics if it would:

Threshold (a): ***Have a substantial adverse effect on a scenic vista?***

Threshold (b): ***Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

Threshold (c): ***In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?

Threshold (d): Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

b) Analysis of Project Impacts

Threshold (a): Would the Project have a substantial adverse effect on a scenic vista?

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Specific Plan Update in and of itself does not propose or authorize any project or development plan. In general, the purpose of the Specific Plan Update is to provide the opportunity to implement the vision of the community. Future development would be required to adhere to all City design guidelines and standards, including the Zoning Ordinance, General Plan policies, and the Specific Plan Update development guidelines. There are no policies or programs in the Specific Plan Update that would directly affect scenic vistas nor any that would degrade the visual character of the City. Furthermore, as previously discussed, there are no scenic vistas within the Specific Plan Update area. Therefore, no impacts would occur, and no mitigation would be required.

Threshold (b): Would the Project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), there are no state scenic highways in the vicinity of El Segundo, including the Specific Plan area. Therefore, no impact would occur and no mitigation would be required.

Threshold (c): In non-urbanized areas, 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 the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Specific Plan area is located in a highly developed urban area and contains commercial, residential, and public land uses. The Specific Plan Update would not substantially change the existing development pattern, although it would allow the area to redevelop at a higher intensity of land uses. Despite the increase in intensity, the Specific Plan Update would enhance the visual quality and character of Downtown El Segundo. For example, the land use and development standards in the Specific Plan Update include limitations on building height, minimum setbacks, and density limits in the private realm. With respect to the public realm, the Specific Plan Update includes placemaking and beautification guidelines, including gateway and signage placement and design, streetscape and pedestrian amenities, public art, and landscaping. Furthermore, one of the planning principles of the Specific Plan Update is to "embrace the unique small-town 'village'

character'…" of the Project area by preserving the historic charm and supporting a pedestrian-friendly environment. Adherence to the Specific Plan Update, General Plan Land Use Element policies, and the ESMC would ensure that future development would enhance the community image, streetscape, and private development.

With respect to public views, public views in the vicinity of the Project Site include the elevated terrain of the Santa Monica Mountains to the north, San Gabriel Mountains to the north/northeast, and the beaches and coastline to the west. PCH bisects the City in a north/south direction; although, the portion of PCH that runs through the City is not designated as a scenic highway. Views from the Project Site are limited to existing urban development. The beaches and coastline are not visible from the Project area at ground level due to the undulating topography and the existing urban development. The Santa Monica Mountains are located approximately 12 miles to the north and the San Gabriel Mountains are located over 30 miles to the northeast. These two mountain ranges are only intermittently visible from the Project area due to their distance and the intervening urban development and topography. In addition, **Table IV.A-1, Consistency with General Plan Aesthetics Goals and Policies**, demonstrates that the Project would be consistent with the goals and policies related to aesthetics in the General Plan.

Therefore, due to the urban character of the existing viewshed as well as the existing undulating topography in the vicinity, the Project would have a less-than-significant impact on visual character and public views and no mitigation would be required.

Table IV.A-1
Consistency with General Plan Aesthetics Goals and Policies

Goal or Policy	Consistency
Land Use Element	
Goal LU1: Maintenance of El Segundo's "Small Town": Maintain El Segundo's "small town" atmosphere, and provide an attractive place to live and work.	**Consistent.** One of the planning principles of the Specific Plan Update is to "embrace the unique small-town 'village' character'…" of the Project area by preserving the historic charm and supporting a pedestrian-friendly environment. Another of the planning principles of the Specific Plan Update is to "…increase the economic vitality of Downtown to foster an active center serving residents, visitors, and local workers." The implementation of the Specific Plan Update would also provide an attractive place for people to live and work through the residential opportunities principle: "Promote a range a housing options with opportunities for all incomes." These principles would be implemented through development standards in the private realm, such as permitted land uses, building placement and orientation, setbacks, etc.
Policy LU1-1: Preserve and maintain the City's low-medium density residential nature, with low building height profile and character, and minimum development standards.	**Consistent.** The Project would implement development standards specific to the Downtown area. Implementation of the Project would not affect the existing residences outside of the Project area, where the majority of the residences in the City are located.
Policy LU4-2.1: Revitalize and upgrade commercial areas, making them a part of a viable,	**Consistent.** The vision of the Specific Plan Update is to "create an economically prosperous

Table IV.A-1
Consistency with General Plan Aesthetics Goals and Policies

Goal or Policy	Consistency
attractive, and people-oriented commercial district. Consideration should be given to aesthetic architectural improvements, zoning, and shopper amenities.	Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together. The Specific Plan's goal is to create a balance of uses within the Downtown to reach its optimal potential and will provide direction for streetscape beautification, outdoor gathering spaces, improved mobility, and other enhancements that will establish a unique and inviting environment that highlights its historical and cultural roots to enrich this community destination." The implementation of the vision and goal stated in the Specific Plan Update would support the revitalization of commercial areas within Downtown El Segundo, thus, supporting this policy.
Conservation Element	
Goal CN5: Urban Landscape: Develop programs to protect, enhance, and increase the amount and quality of the urban landscape to maximize aesthetic and environmental benefits.	**Consistent.** Chapter 4 (Public Realm – Placemaking and Beautification) of the Specific Plan Update includes placemaking and beautification guidelines, including gateway and signage placement and design, streetscape and pedestrian amenities, public art, and landscaping. Through placemaking and beautification, the Project would preserve and increase the urban aesthetic of the Downtown area. This would be done by enhancing the entrances into Downtown, providing multi-use public spaces, and providing public amenities (such as shaded seating and gathering areas). Expanded mobility for walking, driving, bicycling, and transit are also principles of the Specific Plan Update that would further this goal.
Policy CN5-1: Preserve the character and quality of existing neighborhood and civic landscapes.	**Consistent.** One of the planning principles of the Specific Plan Update is to "embrace the unique small-town 'village' character…" of the Project area by preserving the historic charm of the area and supporting a pedestrian-friendly environment. In addition, future development in the Specific Plan area would provide multi-use public spaces and public amenities (such as shaded seating and gathering areas).
Open Space Element	
Goal OS1: Provision and Maintenance of Open Space and Recreation Facilities: Provide and maintain high quality open space and recreational facilities that meet the needs of the existing and future residents and employees within the City of El Segundo.	**Consistent.** The Specific Plan area does not contain any public parks. However, future development in the Specific Plan area would provide public open space areas, such as plazas and courtyards. One of the principles in the public realm portion of the Specific Plan Update is to "provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing." Chapter 2 of the Specific Plan Update identifies three areas in the Civic Center District as having the potential to be a

Table IV.A-1
Consistency with General Plan Aesthetics Goals and Policies

Goal or Policy	Consistency
	community plaza space, with specific components (e.g., outdoor event space, green space, shading seating, passive activities, signage, public art, etc.).
Source: EcoTierra Consulting, August 2023.	

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

(1) Nighttime Lighting

The Specific Plan Update encourages the addition of lighting to enhance the aesthetic (i.e., decorative lighting), and increase safety and security. For example, the Specific Plan Update encourages lighting in the private realm "for nighttime activities, security, and aesthetic interest. Up lighting of trees and/or string lights or other accent lighting elements are encouraged."[7]

The Specific Plan Update also encourages the addition of signage for the purpose of wayfinding, interpretation/education, and gateway signs. For example, the public plaza development standards in the Specific Plan Update include "signage to educate the public about California native plants and the Blue Butterfly."[8] In the private realm, for example, the Specific Plan Update notes that signs are "features of shopping and entertainment districts as they serve as invitations for people to enter and patronize stores and restaurants."[9]

The Specific Plan Update contains several development standards that ensure that future development in the Specific Plan area would not create a new source of light that could affect nighttime views. For example, the Specific Plan Update states the following:

- The sign must not contain any glare producing surfaces or inappropriate lighting (blinking, fluorescent, neon lights, exposed power cords, etc.). (Page 2-40)
- *Color Temperature and Brightness of Lighting*. Lighting must be of a color temperature between 2,500 Kelvin and 3,000 Kelvin; 2,700 Kelvin is ideal. All lighting must be dimmable, and must not exceed the brightness of the public street lighting as determined by the Director. (Page 2-45)
- The light must not contain any glare producing surfaces or inappropriate lighting (blinking, fluorescent, neon lights, etc.). (Page 2-45)
- Over lighting of sites should be prevented to avoid ruining desired nighttime ambiance. The quality of light, level of light and type of bulb or source should be carefully selected

[7] *City of El Segundo, El Segundo Downtown Specific Plan, Public Review Draft, May 2023, page 2-26.*
[8] *Ibid., page 2-25.*
[9] *Ibid., page 2-38.*

so that lighting levels do not draw attention to the glow or glare of the project site. (Page 4-13)

- Use full or partial cut-off lighting fixtures to minimize light pollution and glare. Timers and sensors should be incorporated to avoid unnecessary lighting. (Page 4-13)

In addition, future development in the Specific Plan area would be required to comply with existing California Building Code regulations pertaining to lighting, as adopted by reference pursuant to Chapter 13-1-1 of the ESMC. The development standards in the California Building Code provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality. Lighting elements would also comply with Specific Plan requirements, including the development standards listed above, and site plan review.

Furthermore, the Specific Plan area is urbanized and currently contains sources of light and glare, such as street lights, signs, security lighting in parking lots and along walkways, lighted recreation facilities, and light emitted from the interiors of buildings. Exterior light sources, such as lighted walkways in outdoor areas and landscape accent lighting, are typically common on higher volume commercial properties in the area. Therefore, due to the urban character of the Specific Plan area as well as compliance with existing regulations and the Specific Plan Update development standards, the Project would not adversely affect existing nighttime views and the impact would be less than significant and no mitigation would be required.

(2) Daytime Glare

As previously discussed, Section 21466.5 of the California Vehicle Code states: “No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway.” The Specific Plan Update contains several development standards that ensure future development in the Specific Plan area would not create a new source of glare that could affect daytime views. For example, the Specific Plan Update states the following:

- All buildings shall be sited to reduce odor, noise, light and glare, and visual and other conflicts between commercial and residential uses. (Page 2-31)

- The sign must not contain any glare producing surfaces or inappropriate lighting (blinking, fluorescent, neon lights, exposed power cords, etc.). (Page 2-40)

The Specific Plan area is urbanized and currently contains buildings and structures with glass, metal, and polished exterior or roofing materials contribute to local sources of glare. Project design, including selection and placement of building materials would comply with Specific Plan requirements, including the development standards listed above, and site plan review. Therefore, the proposed Project would not create a new source of substantial daytime glare and the impact would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

Of the 13 related projects listed in **Table II-1**, **List of Related Projects**, those that could combine with the proposed Project to result in a potentially significant impact are the updated Smoky Hollow Specific Plan (Related Project No. 9), Related Project No. 11 (141 Eucalyptus Drive), and Related Project No. 5 (201-209 Richmond Street). Related Project No. 5 is located within the Specific Plan area (i.e., proposed Project area).

Related Project No. 11 is located within the Smoky Hollow Specific Plan area. The Smoky Hollow Specific Plan boundary extends from the southeastern boundary of the Specific Plan area easterly to Pacific Coast highway. The updated Smoky Hollow Specific Plan sets forth a regulatory and planning framework, including development standards, that focus on revitalizing buildings for incubator industrial and office space.

a) Public Views and Scenic Quality

Cumulative development generally would not create additive effects to individual view locations because view changes would be location specific. In addition, future development is not expected to directly alter scenic resources, such as the mountains or ocean. Therefore, the incremental effects of the proposed Project on scenic views would not be cumulatively considerable and there would be no significant cumulative impact.

As discussed under Threshold (c), implementation of the future development within the Specific Plan area is expected to generally improve visual character by supporting new development that is consistent with the development standards and guidelines set forth in the Specific Plan Update. As Related Project No. 5 is within the Specific Plan area, if it is approved after the proposed Project is approved, then it would be required to adhere to the development standards set forth in the Specific Plan Update.

The Smoky Hollow Specific Plan includes the following development standard objectives that are relevant to cumulative visual character, which would also apply to Related Project No. 11.[10]

- Encourage reuse and preservation of existing buildings that contribute positively to the area's visual and functional character.
- Create standards and guidelines that differentiate between the smaller scale block-and-lot patterns of the western portion of the district and the larger scale block-and-lot patterns of the eastern portion to conserve opportunities for a variety of business types and maintain the sense of district authenticity.
- Identify standards and guidelines for on-site open space and encourage the retention and development of off-site open spaces.

[10] *City of El Segundo, Smoky Hollow Specific Plan Public Review Draft, February 2018. https://www.elsegundobusiness.com/business-community/smoky-hollow. Accessed August 2023.*

The Specific Plan Update considered the standards and goals of the Smoky Hollow Specific Plan during its development. The Smoky Hollow Specific Plan identifies improvements along Franklin Avenue, which include artistic crosswalks and potential future "woonerf", which are envisioned to transform the street into a pedestrian and bike-friendly connection between Smoky Hollow and the Specific Plan area (page 3-2 of the Specific Plan Update). This would improve visual character and would be consistent with the community's vision for Downtown El Segundo. Therefore, the incremental effects of the proposed Project on visual character would not be cumulatively considerable and there would be no significant cumulative impact.

b) Light and Glare

The urbanized Project setting supports numerous nighttime lighting sources and contains buildings and facilities constructed of potentially reflective materials, including metal paneling and glass. Future development in the Specific Plan area would have the potential to incrementally increase light and glare associated with the new development. However, the California Vehicle Code requires new development to avoid glare impacts. In addition, all lighting installed in the Specific Plan Project area would comply with applicable guidelines included in the Specific Plan Update that would be comparable to ESMC regulations concerning light and glare. Lastly, the surrounding area is largely developed and is urbanized; as such, the area currently includes sources of interior and exterior lighting. Therefore, the incremental light and glare effects of the proposed Project would not be cumulatively considerable and there would be no significant cumulative impact.

6. Mitigation Measures

Project-level and cumulative impacts with regard to aesthetics would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to aesthetics would be less than significant.

8. References

Caltrans (California Department of Transportation). 2019. "List of Eligible and Officially Designated State Scenic Highways (XLSX)." August 2019. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed March 2023.

City of El Segundo. 1992a. City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992. https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed March 2023.

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City of El Segundo, Smoky Hollow Specific Plan Public Review Draft, February 2018. https://www.elsegundobusiness.com/business-community/smoky-hollow. Accessed August 2023.

IV. Environmental Impact Analysis

B. Air Quality

1. Introduction

This section describes the existing air quality conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. The analysis is primarily based on the *Air Quality Study for the El Segundo Downtown Specific Plan Update Project* (Air Quality Study) prepared by Noah Tanski Environmental Consulting (NTHC), dated September 13, 2023, and included in **Appendix C** of this Draft EIR. Other sources consulted are listed in **Section IV.B.9, References**, below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Pollutants and Effects

a) State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the United States Environmental Protection Agency (USEPA) due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The following descriptions of each criteria air pollutant and their health effects are based on information provided by the USEPA and the South Coast Air Quality Management District (SCAQMD).[1,2]

(1) Carbon Monoxide – CO

CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the blood stream and can lead to

[1] *USEPA, Criteria Air Pollutants, website: www.epa.gov/criteria-air-pollutants. Accessed September 2023.*

[2] *SCAQMD, Final 2012 Air Quality Management Plan, February 2013.*

weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

(2) Ozone – O_3

O_3 is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_X emissions is automobile exhaust. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O_3 irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

(3) Nitrogen Dioxide – NO_2

NO_2 is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

(4) Sulfur Dioxide – SO_2

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO_2 may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

(5) Particulate Matter (PM_{10} and $PM_{2.5}$)

The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM_{10}) or even less than 2.5 microns ($PM_{2.5}$) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against

inhaled materials, and damage lung tissue. Those most sensitive to PM_{10} and $PM_{2.5}$ include children, the elderly, and those with chronic lung and/or heart disease.

(6) Lead – Pb

Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

b) Toxic Air Contaminants – TACs

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. As discussed earlier, California Air Resources Board (CARB) and Office of Environmental Health Hazards Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[3]

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. SCAQMD's 2021 Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from gas- and diesel-powered vehicle emissions – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential cancer risk from vehicle traffic.[4] Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.[5] In addition to its carcinogenic potential, diesel PM may also contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.[6]

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[3] *CARB, Toxic Air Contaminant Identification List, website: https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants, last reviewed by CARB July 18, 2011.*

[4] *CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.*

[5] *SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), 2021.*

[6] *CARB, Overview: Diesel Exhaust & Health, website: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed September 2023.*

c) Volatile Organic Compounds – VOCs

VOCs are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the State as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_X, CO, SO_2) and contribute to the formation of photochemical smog.

3. Existing Conditions

The Project is located within the 6,745-square-mile South Coast Air Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. The USEPA has classified Los Angeles County as a nonattainment area for O_3, $PM_{2.5}$, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O_3, PM_{10}, and $PM_{2.5}$. **Table IV.B-1, State and Federal Ambient Quality Standards and Attainment for L.A. County**, below, summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

Table IV.B-1
State and Federal Ambient Quality Standards and Attainment for L.A. County

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-Attainment	—	—
	8-hour	0.07 ppm (137 µg/m^3)	Non-Attainment	0.070 ppm (137 µg/m^3)	Non-Attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-Attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-Attainment	—	—
Fine Particulate Matter ($PM_{2.5}$)	24-hour	—	—	35 µg/m^3	Non-Attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-Attainment	12 µg/m^3	Non-Attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment

Table IV.B-1
State and Federal Ambient Quality Standards and Attainment for L.A. County

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (339 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	—	—
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	—	—
	Calendar Quarter	—	—	0.15 µg/m^3	Non-Attainment

ppm = parts per million by volume
µg/m^3 = micrograms per cubic meter

Sources: Maps of State and Federal Area Designations, website: https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed September 2023.

a) Existing Pollutant Levels

The SCAQMD monitors air quality conditions in 38 source receptor areas ("SRAs") throughout the Basin. The Project is located in SCAQMD's SRA No. 3, "Southwest Coastal Los Angeles County." **Table IV.B-2, Ambient Air Quality Data – SRA No. 3 "Southwest Coastal Los Angeles County"** shows pollutant levels, State and federal standards, and the number of exceedances recorded in SRA No. 3 from 2019 through 2021. As shown, the eight-hour Federal and State standard for O_3 was exceeded twice during this three-year period, and the State one-hour standard was exceeded once. The State standard for PM_{10} was exceeded twice. The Federal standard for PM_{10} was not exceeded. CO, NO_2, and SO_2 levels did not exceed their respective CAAQS or NAAQS during this period. Data for $PM_{2.5}$ is not available for the time period.

Table IV.B-2
Ambient Air Quality Data – SRA No. 3 "Southwest Coastal Los Angeles County"

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2019	2020	2023
Ozone – O_3			
Maximum 1-hour Concentration (ppm)	0.082	0.117	0.059
Maximum 8-hour Concentration (ppm)	0.067	0.074	0.049
Days > 0.070 ppm (Federal/State 8-hour standard)	0	2	0
Days > 0.09 ppm (State 1-hour standard)	0	1	0

Table IV.B-2
Ambient Air Quality Data – SRA No. 3 "Southwest Coastal Los Angeles County"

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2019	2020	2023
Carbon Monoxide - CO			
Maximum 1-hour Concentration (ppm)	1.8	1.6	1.7
Maximum 8-hour Concentration (ppm)	1.3	1.3	1.3
Days > 35 ppm (Federal 1-hour standard)	0	0	0
Days > 20 ppm (State 1-hour standard)	0	0	0
Days > 9.0 ppm (Federal/State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO_2			
Maximum 1-hour Concentration (ppb)	56.6	59.7	62.8
Days > 100 ppb (Federal 1-hour standard)	0	0	0
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration (µm/m^3)	62	43	33
Days > 150 µg/m^3 (Federal 24-hour standard)	0	0	0
Days > 50 µg/m^3 (State 24-hour standard)	2	0	0
$PM_{2.5}$			
Maximum 24-hour Concentration (µm/m^3)	N/A	N/A	N/A
Days > 35 µg/m^3 (Federal 1-hour standard)	N/A	N/A	N/A
Sulfur Dioxide - SO_2			
Maximum 24-hour Concentration (ppb)	8.2	6.0	7.7
Days > 75 ppb (Federal 1-hour standard)	0	0	0
Days > 250 ppb (State 1-hour standard)	0	0	0
Days > 40 ppb (State 24-hour standard)	0	0	0
Lead - Pb			
Maximum Monthly Average Concentration (µg/m^3)	0.004	0.008	0.012
Maximum 3-Month Rolling Averages (µg/m^3)	0.004	0.005	0.012

Notes:
N/A = data not available
ppm = parts per million of air, by volume
ppb = parts per billion of air, by volume
µg/m^3 = micrograms per cubic meter
Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-datastudies/historical-data-by-year. Accessed September 11, 2023.

b) Existing Health Risk

The Multiple Air Toxics Exposure Study V (MATES V) is the latest air toxics monitoring and evaluation study conducted in the Air Basin. In short, MATES V is a modeling effort to characterize risk from air toxics across the Air Basin. The Specific Plan area is located within the 90245 zip code. Based on the MATES V model, the calculated cancer risk from air toxics in the 90245 zip code is approximately 540 in one million, which is higher than the Air Basin's average risk of 454

per one million. The air toxics risk in the Project's zip code is higher than it is for 78.0 percent of the population with the Air Basin.[7]

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that identifies which California communities are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The tool ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors, and prevalence of certain health conditions. According to CalEnviroScreen 4.0, the Specific Plan's pollution-specific burden, irrespective of other socioeconomic factors, is ranked 84th percentile.[8]

c) Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), childcare centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours. However, the SCAQMD suggests that localized significance thresholds (LSTs) based on shorter averaging periods, such as the NO_2 and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.[9]

The Project's nearest sensitive receptors, as defined by the SCAQMD (e.g., residences, hospitals, or convalescent facilities) are the following:

- Multi-family residential building (350 Richmond Street) – this sensitive receptor is located within the Specific Plan area.
- Residential uses along Richmond Street, near Grand Avenue – these sensitive receptors are located within the Specific Plan area.

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7 *SCAQMD, Multiple Air Toxics Exposure Study V, MATES Data Visualization Tool, website: https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A204&views=view_1. Accessed September 2023.*

8 *Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0. website: https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/. Accessed: September 2023.*

9 *SCAQMD, Final Localized Significance Threshold Methodology, June 2003. Revised July 2008.*

- Residential land uses located along and west of Richmond Street – other sensitive receptors located along Richmond Street are directly north of the Specific Plan area, across Holly Avenue.
- Residential land uses located along and east of Standard Street – the nearest residential uses are directly east of the Specific Plan area, across Standard Street.
- Residential land uses located along and west of Concord Street – the nearest residential uses are directly west of the Specific Plan area, across Concord Street.

Though not technically sensitive receptors, as defined by the SCAQMD, the following receptors are also worth identifying:

- Richmond Street Elementary School (615 Richmond Street) – approximately 275 feet northeast of the Specific Plan area.
- El Segundo High School (640 Main Street) – directly north of the Specific Plan area, across Mariposa Avenue.
- El Segundo Pre-School (301 West Grand Avenue) – directly west of the Specific Plan area, across Concord Street.

Non-sensitive commercial land uses where workers may be present for up to eight hours include a multitude of uses located within the Specific Plan area.

4. Relevant Plans, Policies, and Ordinances

a) Federal

(1) Federal Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by State and local agencies. In California the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the State level and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of

additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in **Table IV.B-1, State and Federal Ambient Quality Standards and Attainment for L.A. County**. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and lead.

b) State

(1) California Clean Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California the CCAA is administered by CARB at the State level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the State requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The State standards and attainment/non-attainment are also shown in **Table IV.B-1, State and Federal Ambient Quality Standards and Attainment for L.A. County**.

(2) California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs)

and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

(3) Air Quality and Land Use Handbook: A Community Health Perspective

Released by CARB in 2005, the Air Quality and Land Use Handbook: A Community Health Perspective provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses. Released by CARB in 2005, the Air Quality and Land Use Handbook: A Community Health Perspective provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.[10] The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones." If a project or sensitive land uses are within the siting distance, CARB recommends further analysis. The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones." If a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

c) Regional

(1) South Coast Air Quality Management District

The Project is located within the 6,745-square-mile South Coast Air Basin (Basin). The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

- Rule 401 Visible Emissions: This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.

- Rule 402 Nuisance: This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose,

[10] *CARB, Air Quality and Land Use Handbook, A Community Health Perspective, April 2005.*

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."

- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

(2) 2022 Air Quality Management Plan

SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) was adopted in December 2022 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

(3) Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and State air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's Air Quality Management Plan (AQMP). The 2020-2045 RTP/SCS (Connect SoCal), SCAG's latest long-range plan, continues to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2020-2045 RTP/SCS offers a blueprint for how Southern California can grow more sustainably.

The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's Priority Growth Areas (PGAs) and aims to enhance and build out the region's transit network. PGA's such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for just 4 percent of total land in the SCAG region, but they are projected to accommodate 64 percent of the region's future household growth and 74 percent of the region's future employment growth by 2045.[11] According to the 2020-2045 RTP/SCS, dense infill development in PGAs can help reduce travel distances, increase mobility options, leverage transit investments, and improve access to workplaces and other destinations, reducing vehicle miles traveled (VMT) and associated emissions.

[11] *SCAG, Final 2020-2045 RTP/SCS, September 2020.*

d) Local

(1) El Segundo General Plan Air Quality Element

The City's General Plan Air Quality Element was prepared to address the issue of air pollution and its health and economic impacts, comply with the requirements of SCAQMD's 1991 AQMP, address the 1991 AQMP's measures for local government, and increase awareness of local and governmental responsibility for air quality.[12] As explained earlier, the 2022 AQMP is the SCAQMD's current and latest AQMP for the Basin, but many of the Air Quality Element's goals, objectives, and policies are still relevant today. They are shown below:

Goal AQ1: Person Work Trip Reduction for Private Employees.

Objective AQ1-1: A 30 percent reduction in private employee work trips in new and existing development through the use of any combination of alternate work weeks and telecommuting strategies.

Policy AQ1-1.1: It is the policy of the City of El Segundo that the City encourage businesses to adopt alternative work schedules and prepare guidelines to assist local businesses in the implementation of alternative work schedule programs.

Policy AQ1-1.2: It is the policy of the City of El Segundo that businesses be encouraged to establish and maintain telecommuting or work-at-home programs to reduce employee work trips.

Policy AQ1-1.3: It is the policy of the City of El Segundo that Transportation System Management (TSM) plans provide a 30 percent reduction in vehicle ridership or the equivalent Average Vehicle Ridership (AVR) per commute vehicle.

Goal AQ2: Person Work Trip Reduction for Local Government Employees.

Objective AQ2-1: A 30 percent reduction in local government employee work trips using any combination of alternative work weeks and telecommuting strategies.

Policy AQ2-1.1: It is the policy of the City of El Segundo that a study be conducted to implement alternative work schedules and work-at-home programs for City

[12] *City of El Segundo, General Plan Air Quality Element, 1992.*

employees that will maximize the potential for increasing employee productivity.

Policy AQ2-1.2: It is the policy of the City of El Segundo that the City designate an Employee Transportation Coordinator to promote and institute ridesharing and other programs to achieve a 30 percent reduction in vehicle ridership for City employees.

Goal AQ3: Vehicle work trip reduction for private employees.

Objective AQ3-1: Increase the proportion of work trips made by transit.

Policy AQ3-1.1: It is the policy of the City of El Segundo that the City continue to require employers in existing congested areas of the City and developers of large new developments to adopt Transportation System Management (TSM) plans and provide incentives for the provision of transit support facilities.

Policy AQ3-1.2: It is the policy of the City of El Segundo that it continues to require developer TSM plans to encourage trip reduction programs and development of transit and ridesharing facilities over highway capacity expansion in order to achieve and maintain mobility and air quality.

Policy AQ3-1.3: It is the policy of the City of El Segundo to cooperate with efforts to expand bus, rail, and other forms of transit within the Los Angeles region.

Goal AQ4: Reduced Motorized Transportation.

Objective AQ4-1: Promote non-motorized transportation.

Policy AQ4-1.1: It is the policy of the City of El Segundo that the City actively encourage the development and maintenance of a high-quality network of pedestrian and bicycle routes, linked to key locations, in order to promote non-motorized transportation.

Goal AQ5: Vehicle Work and Non-Work Trip Reduction.

Objective AQ5-1: Improve transit systems serving the City and implement parking control methods to reduce work and non-work trips.

Policy AQ5-1.1: It is the policy of the City of El Segundo that the City discourage the use of single-occupant vehicles in congested areas of the City by changing or modifying the availability and cost of parking.

Policy AQ5-1.2: It is the policy of the City of El Segundo that the City actively encourage the enhancement of transit performance and availability and establish developer fees to offset the costs of transit improvements required as a result of new developments.

Goal AQ6: Reduction in Peak-period Truck Travel and Number and Severity of Truck-involved Accidents.

Objective AQ6-1: Pass the necessary ordinances and memorandums of understanding to divert truck traffic during peak traffic periods.

Policy AQ6-1.1: It is the policy of the City of El Segundo that commercial truck emissions be reduced by restricting delivery schedules to off-peak traffic periods, and by creating alternate routes that would increase the efficiency of the City's roadway system.

Goal AQ7: Reduce Vehicle Emissions Through Traffic Flow Improvements.

Objective AQ7-1: Set annual objectives for the continued improvement of interconnected traffic signal control systems or appropriate non-interconnected synchronization methods on all streets where traffic volume and delay time is significant.

Policy AQ7-1.1: It is the policy of the City of El Segundo that a high priority be given to improve the flow of traffic through synchronization of signalized intersections, as this is among the most cost-effective means of reducing congestion, conserving energy, and improving air quality.

Goal AQ8: Reduction in Tailpipe Emissions from Local Government Vehicle Fleets.

Objective AQ8-1: Support legislation which would improve vehicle/transportation technology and the conversion of vehicles by fleet operators to the use of "clean fuel."

Policy AQ8-1.1: It is the policy of the City of El Segundo that the City support legislation for the use and ownership of clean fuel vehicles.

Policy AQ8-1.2: It is the policy of the City of El Segundo that the City support legislation for research, development, and demonstration of clean fuel vehicles in both fleet service and passenger use.

Policy AQ8-1.3: It is the policy of the City of El Segundo that the City invest in clean fuel systems on new City fleet vehicles.

Goal AQ9: Reduction in Length of Vehicle Trips.

Objective AQ9-1: Improve the City's jobs/housing relationship to achieve a reduction in the average length of commute-trips by the year 2010, as designated by SCAG.

Policy AQ9-1.1: It is the policy of the City of El Segundo that the City promote a better balance of jobs and housing within the City by considering housing proposals within areas of the City designated for Smoky Hollow Mixed-Use.

Policy AQ9-1.2: It is the policy of the City of El Segundo that the City participate in sub regional efforts with other cities or agencies to develop mutually beneficial approaches to improving the balance of jobs and housing.

Policy AQ9-1.3: It is the policy of the City of El Segundo that the City actively encourage the establishment of a shuttle bus system to transport employees and El Segundo residents between the east and west sides of the City.

Goal AQ10: Reduction in Particulate Emissions from Paved and Unpaved Roads, Parking Lots, and Road and Building Construction.

Objective AQ10-1: Control particulate emissions by paving roads and parking lots or by adopting alternative methods to control particulates.

Policy AQ10-1.1: It is the policy of the City of El Segundo that an ordinance be adopted requiring the paving or use of alternative particulate control methods on roads with

low levels of vehicle traffic and on dirt roads and parking lots located on industrialized properties such as Chevron and Edison.

Policy AQ10-1.2: It is the policy of the City of El Segundo to adopt incentives, regulations, and/or procedures to prohibit the use of building materials and methods which generate excessive pollutants.

Policy AQ10-1.3: It is the policy of the City of El Segundo that all new development projects meet or exceed requirements of the South Coast Air Quality Management District for reducing PM10 standards.

Goal AQ11: Reduce Emissions Associated with Government Energy Consumption.

Objective AQ11-1: Reduce energy use by City government facilities with an emphasis on peak demand reduction as stated by SCAG.

Policy AQ11-1.1: It is the policy of the City of El Segundo that a study be prepared to initiate implementation of a program for retrofitting City buildings with a full range of energy conservation measures.

Goal AQ12: Reduction in Residential, Commercial, and Industrial Energy Consumption.

Objective AQ12-1: Enact the recommendations of the AQMP Energy Working Group for commercial and residential buildings and adopt ordinances to mitigate air quality impacts from water and pool heating systems.

Policy AQ12-1.1: It is the policy of the City of El Segundo that an ordinance be adopted requiring all new swimming pool water heater systems to utilize solar, electric, or low NO_x gas-fired water heaters, and/or pool covers.

Policy AQ12-1.2: It is the policy of the City of El Segundo that the City encourage the incorporation of energy conservation features in the design of new projects and the installation of conservation devices in existing developments.

Policy AQ12-1.3: It is the policy of the City of El Segundo to provide incentives and/or regulations to reduce emissions from residential and commercial water heating.

Policy AQ12-1.4: It is the policy of the City of El Segundo that new construction not preclude the use of solar energy systems by uses and buildings on adjacent properties and consider enactment of a comprehensive solar access ordinance.

Goal AQ13: Increase Recycling of Solid Waste and Use of Recycled Materials by Glass and Paper Manufacturers.

Objective AQ13-1: Reduce the amount of solid waste by 25 percent by 1994, and 50 percent by 2000.

Policy AQ13-1.1: It is the policy of the City of El Segundo that the City continue to implement the programs proposed in the City's Solid Waste Management Plan, concurrent with California Assembly Bill 939, to achieve a 25% reduction in residential solid waste requiring (disposal by 1995, and a 50% reduction by the year 2000).

Goal AQ14: Prevent Exposure of People, Animals, and Other Living Organisms to Toxic Air Pollutants.

Objective AQ14-1: Restrict emissions of toxic air contaminants in and around the City and insure that sources which impact the City comply with all federal, state, regional, and local regulations.

Policy AQ14-1.1: It is the policy of the City of El Segundo to protect residents and others from exposure to toxic air pollutants by identifying major sources of toxic contaminants in and around the City and insuring that the sources comply with all federal, state, regional, and local regulations.

Policy AQ14-1.2: It is the policy of the City of El Segundo to draft and implement ordinances, where deemed appropriate by the City Council in its discretion, which go beyond the AQMP and SCAQMD regulations to restrict emissions of toxic air contaminants from sources of toxic air pollutants which impact the City of El Segundo.

Goal AQ15: Prevent Exposure of People, Animals, and Other Living Organisms to Unhealthful Levels of Air Pollution.

Objective AQ15-1: Reduce unsafe levels of air pollutants impacting the City.

Policy AQ15-1.1: It is the policy of the City of El Segundo to protect the residents of the City and others from exposure to unsafe levels of air pollution, including but not limited to, pollutants such as volatile organic compounds, particulates, oxides of nitrogen, oxides of sulfur, lead, ozone, and carbon monoxide, by taking all appropriate air pollution control measures to reduce unsafe levels of air pollutants impacting the City.

Policy AQ15-1.2: It is the policy of the City of El Segundo to coordinate with the SCAQMD to ensure that all elements of the AQMP regarding reduction of all air pollutant emissions are being met and are being enforced.

Policy AQ15-1.3: It is the policy of the City of El Segundo to draft and implement ordinances where deemed appropriate by the City Council in its discretion, which go beyond the AQMP and SCAQMD regulations to reduce emission of and exposure to air pollutants which impact the City of El Segundo.

Policy AQ15-1.4: It is the policy of the City of El Segundo to continue working with the City of Los Angeles to eliminate odor problems from the Hyperion Treatment Plant; this will include the continuation of the Mitigation Monitoring Implementation Plan.

(2) El Segundo Municipal Code

The City of El Segundo Municipal Code contains the following standards related to air quality:

Section 7-3-1: It is the policy to prohibit unnecessary and excessive emission of dust and particulate matter 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, maintained, or caused, any emissions of dust or particulate matter in a manner prohibited by or not in conformity with the provisions of this Chapter, is a public nuisance and shall be punished as such.

A. Dust Emissions: A person shall not create, maintain or cause or allow to be created, maintained or caused, the emissions of dust or particulate matter from any transport, handling, construction, demolition, excavation, grading, clearing of land or storage activity so that the presence of such dust or particulate matter remains visible in the atmosphere beyond the property line of the emission source.

B. Exclusions: A person or entity shall not be found in violation of subsection (A) of this Section if that person or entity has taken every reasonable precaution to minimize the dust or particulate matter emissions resulting from its activity. Reasonable precautions include, but are not limited to, the following: site watering; soil binders; street sweeping; organic control erosion amts; covering loose soil; sloping and bracing excavation sites to minimize erosion; and establishing ground cover.

5. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to air quality are based on Appendix G of the *State CEQA Guidelines*. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to air quality would occur if the Project would:

Threshold (a): ***Conflict with or obstruct implementation of the applicable air quality plan;***

Threshold (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;***

Threshold (c): ***Expose sensitive receptors to substantial pollutant concentrations; and***

Threshold (d): ***Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.***

b) Air Quality Significance Thresholds

(1) Criteria Pollutants

(a) Construction

The following criteria set forth in the SCAQMD's CEQA Air Quality Handbook serve as quantitative air quality standards to be used to evaluate project construction impacts with respect to the Appendix G thresholds. Under these thresholds, a significant impact would occur if:

- Regional emissions from both direct and indirect sources exceed the thresholds shown in **Table IV.B-3**, **SCAQMD Construction Emissions Thresholds**.
- Maximum on-site daily localized emissions exceed the LSTs also shown in **Table IV.B-3**, **SCAQMD Construction Emissions Thresholds**.

Table IV.B-3
SCAQMD Construction Emissions Thresholds

Criteria Pollutant	Construction Emissions (lbs per day)	
	Regional	Localized[a]
VOCs	75 pounds/day	-
NO_x	100 pounds/day	131 pounds/day
CO	550 pounds/day	967 pounds/day
SO_x	150 pounds/day	-
PM_{10}	150 pounds/day	8 pounds/day
$PM_{2.5}$	55 pounds/day	5 pounds/day

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter

[a] *Localized significance thresholds assumed the following: The Project is located in SRA No. 3, "Southwest Coastal Los Angeles County."*

Source: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

The LSTs shown in **Table IV.B-3**, **SCAQMD Construction Emissions Thresholds** are representative of a two-acre project site located within 25 meters of sensitive receptors. As explained further below, a two-acre project site corresponds with the scenario addressed in the Project's construction analysis, which conservatively assumes that up to ten percent of the Project, more specifically ten percent of the increases in land uses allowed by the Project (i.e., 20,000 square feet of the allowable 200,000 square feet increase in office uses), could be under construction simultaneously. Twenty-five meters is the shortest receptor distance used for analysis per the SCAQMD's LST methodology, and it results in the most stringent emissions thresholds for a given project size.

(b) Operations

The following SCAQMD thresholds serve as quantitative air quality standards to evaluate project operational impacts with respect to the Appendix G thresholds. Under these thresholds, a significant impact would occur if:

- Operational emissions from both on- and off-site sources exceed the regional thresholds shown in **Table IV.B-4**, **SCAQMD Operational Emissions Thresholds**.
- Maximum on-site daily localized emissions exceed the LSTs also shown in **Table IV.B-4**, **SCAQMD Operational Emissions Thresholds**.
- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

Table IV.B-4
SCAQMD Operational Emissions Thresholds

Criteria Pollutant	Construction Emissions (lbs per day)	
	Regional	Localized[a]
VOCs	55 pounds/day	-
NO_x	55 pounds/day	91 pounds/day
CO	550 pounds/day	664 pounds/day
SO_x	150 pounds/day	-
PM_{10}	150 pounds/day	1 pounds/day
$PM_{2.5}$	55 pounds/day	5 pounds/day

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter
[a] *Localized significance thresholds assumed the following: The Project is located in SRA No. 3, "Southwest Coastal Los Angeles County."*

Source: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

The LSTs shown in **Table IV.B-4**, **SCAQMD Operational Emissions Thresholds** are representative of a one-acre project site located within 25 meters of sensitive receptors. A one-acre project site is the smallest project size used for analysis per the SCAQMD's LST methodology. Twenty-five meters is the shortest receptor distance used for analysis in this methodology. Thus, use of these assumptions is conservative and results in the most stringent emissions thresholds under the SCAQMD's LST methodology.

(c) TACs – Health Risks

- The following SCAQMD thresholds are utilized to evaluate project construction and operations-related TAC impacts with respect to the Appendix G thresholds. Under these thresholds, a significant impact would occur if the Project results in:
- A maximum incremental cancer risk greater than or equal to 10 in one million.
- A population wide cancer burden greater than 0.5 (in areas where existing cancer risk is greater than or equal to one in one million.
- A chronic or acute hazard index greater than or equal to 1.0.

c) Analysis of Project Impacts

Threshold (a): Would the Project conflict with or obstruct implementation of the applicable air quality plan?

(1) SCAQMD 2022 AQMP and SCAG 2020-2045 RTP/SCS Consistency

The following analysis assesses the Project's consistency with the SCAQMD's 2022 AQMP and SCAG's latest 2020-2045 RTP/SCS. As discussed earlier, the 2022 AQMP's projections for achieving State and federal air quality goals are largely based on population, housing, and employment trend assumptions in the 2020-2045 RTP/SCS. Therefore, a project is consistent

with the 2022 AQMP if it is consistent with the population, housing, and employment trend assumptions and smart growth strategies that were used in the formation of the AQMP, which largely stem from the 2020-2045 RTP/SCS.

The 2022 AQMP's emissions modeling relies on growth factors for population at the county level. The 2022 AQMP assumes that population in Los Angeles County will grow from 9,869,000 in 2018 (the AQMP's baseline year) to 10,803,000 by 2037. For housing, the 2022 AQMP assumes that housing in the entire AQMP area will increase from approximately 5.3 million units total in 2018 to 6.2 million units by 2037. For employment, the 2022 AQMP assumes that employment in the entire AQMP area will increase from approximately 7.7 million in 2018 to 8.6 million by 2037. Its emissions modeling also relies on sector-specific job growth factors for Los Angeles County. Overall, the Project's development would broadly reflect the population, housing, and employment growth that the 2022 AQMP and 2020-2045 RP/SCS anticipate for Los Angeles County and the greater AQMP area by 2037. However, the more important consideration is the fact that the Project's population, housing, and employment growth would be consistent with regional growth strategies promoted by the 2020-2045 RTP/SCS and endorsed by the SCAQMD.

As noted earlier, Priority Growth Areas (PGAs) such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for only four percent of the SCAG region's total land area, but the 2020-2045 RTP/SCS anticipates that 64 percent of new household growth and 74 percent of employment growth will occur in these PGAs. According to the 2020-2045 RTP/SCS, dense infill development in PGAs can support the goals of the 2020-2045 RTP/SCS by reducing travel distances, increasing mobility options, improving access to workplaces, leveraging transit investments, and conserving the region's resource areas. Thus, the 2020-2045 RTP/SCS emphasizes new infill construction in PGAs and assumes a significant increase in multi-family housing and other dense urban uses built in such locations, in some cases outpacing what is currently anticipated by local general plans. Concentrating growth in these areas is vital to attaining the goals of both the 2020-2045 RTP/SCS and the 2022 AQMP. Therefore, projects fitting this land use pattern are considered consistent with the 2020-2045 RTP/SCS and the 2022 AQMP.

The Downtown Specific Plan Update aims to achieve or bolster this land use pattern within the Specific Plan area. First, the Specific Plan area is already designated a NMA. The 2020-2045 RTP/SCS targets growth in NMAs because of NMAs robust residential to non-residential land use connections and high roadway intersection densities. These features promote safer, multimodal, short trips and can reduce reliance on single occupancy vehicles, reducing VMT. The Project's Transportation Assessment, prepared by Fehr and Peers, supports this, concluding that the Project would result in a reduction of VMT per service population as compared to citywide baselines. On this basis alone, development of the Project and its land uses within the Specific Plan area would be consistent with the 2020-2045 RTP/SCS's goals and growth assumptions that emphasize dense infill development within PGAs. Second, the Project proposes a range of transportation and mobility improvements that would bolster the area's existing walkability and promote alternative transportation modes. For example, the Project proposes the following improvements:

- Pedestrian crossing enhancements at 12 locations
- Area-wide sidewalk curb ramp enhancements
- Bicycle mobility enhancements on two roadway segments
- Area-wide bicycle accommodation and wayfinding enhancements
- Bus stop enhancements at six existing bus stops
- Signal operation enhancements on two roadway segments
- Area-wide intersection control improvements (signage and striping)
- In-road bollard receptacles for temporary street closures at two locations
- Area-wide on-street parking striping enhancements
- Area-wide off-street parking optimization enhancements

By implementing these transportation and mobility improvements and by focusing dense new retail, commercial, and residential uses within a PGA, the Project fits the land use pattern adopted and emphasized by the 2020-2045 RTP/SCS and would contribute directly to its goals. The Project would not result in growth, or accompanying emissions, that are unaccounted for by the 2020-2045 RTP/SCS or the 2022 AQMP. Projects that are consistent with the 2020-2045 RTP/SCS are part of the regional solution for meeting the 2022 AQMP's air pollution reduction goals. In this regard, the Project would not have a significant long-term impact on the region's ability to meet State and federal air quality standards.

Additionally, to be discussed further below, pollutant emissions associated with the construction and operations of future projects facilitated by the Downtown Specific Plan Update would not exceed SCAQMD regional criteria pollutant criteria, meaning that the SCAQMD would not consider the Project's emissions to exceed or contribute substantially to exceedances of ambient air quality standards and thresholds in the Air Basin. As such, the Project's emissions also would not be considered to interfere with the AQMP's attainment of air quality standards or interim emissions reductions, and the Project would not conflict with the 2022 AQMP.

Because Project-related growth would be consistent with 2022 AQMP projections that are themselves based on 2020-2045 RTP/SCS projections, and because pollutant emissions associated with the Project would neither exceed nor substantially contribute to any exceedance of ambient air quality standards and thresholds, the Project would not conflict with or obstruct implementation of the 2022 AQMP. Therefore, impacts would be less than significant and no mitigation would be required.

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

(1) Construction

The Downtown Specific Plan Update would facilitate construction of future developments within the Specific Plan area through 2040. These future developments could occur on any property within the Specific Plan area and affect existing or future land uses located within or surrounding the Specific Plan area, including sensitive receptors such as residences and schools. Thus, this analysis broadly addresses the potential for Project implementation to result in substantial emissions of criteria pollutants.

Construction of projects facilitated by the Downtown Specific Plan Update would generate criteria pollutant emissions throughout the implementation period through 2040. This does not mean that all facilitated projects would be under construction simultaneously until 2040; the City conservatively estimates that a maximum 10 percent of buildout allowed under the Project could be under construction in any given year, but there are also likely to be periods in which no construction occurs. The exact location and types of development are not known, but the general location and types of development can be reasonably anticipated. For example, projects would likely be concentrated along Main Street and would consist mainly of low-rise or mid-rise buildings, in accordance with existing and proposed site-development standards for the Project's districts. Construction would involve phases such as demolition, grading, building construction, paving, and architectural coating activities.[13] Fugitive dust (PM_{10}) emissions would typically be greatest during demolition and grading activities due to the disturbance of soils and debris. NO_X and other emissions would result from the combustion of diesel fuels used to power off-road construction vehicles (e.g., backhoes, bulldozers, etc.) and trucks. Worker, vendor, and other construction-related vehicle trips would also generate criteria pollutant emissions. The magnitude of construction emissions and their impacts to sensitive receptors would be dependent on project-specific factors that are not known at this time (e.g., proximity to sensitive receptors, the types and quantity of equipment utilized by projects, the number of construction vehicle trips generated by projects, etc.), but given the allowable uses and typical construction activities, as well as SCAQMD's rules for fugitive dust, it is nevertheless possible to conservatively estimate construction emissions – and assess the significance of construction emissions – that would be associated with construction of projects facilitated by the Downtown Specific Plan Update. As noted earlier, the City conservatively estimates that a maximum 10 percent of buildout allowed under the Project could be under construction in any given year (see **Table IV.B-5**, **Specific Plan Buildout, Average, and Worst-Case Construction Estimates**).

[13] *The Specific Plan area is highly urbanized and does not contain natural lands that would involve the types of land clearing activities (e.g., grubbing, tree/stump removal, etc.) associated with site preparation assumptions in CalEEMod.*

Table IV.B-5
Specific Plan Buildout, Average, and Worst-Case Construction Estimates

Land Use	Total Allowable Land Use Increase (Full Buildout)[a]	Average Year (For 25 years)	Worst-Case Year (10% of Full Buildout)
Retail and Restaurant	130,000 sf	5,200 sf	13,000 sf
Office	200,000 sf	8,000 sf	20,000 sf
Medical Office	24,000 sf	960 sf	2,400 sf
Residential	300 units	12 units	30 units

sf = square feet

[a] *The buildout values in this table do not represent the total development square footage that would exist in the Plan's horizon year (2040). Rather, these values represent the maximum new square footage that could be constructed by 2040. The values do not include remodeling of existing buildings and transportation/mobility enhancements (e.g., pedestrian crossing enhancements, bus stop improvements, signal operation enhancements, etc.), which would not result in significant construction emissions.*

Source: NTEC, 2023.

Emissions associated with the construction of these uses were estimated using CalEEMod version 2022, which draws on extensive construction survey data of construction equipment usage, construction equipment emissions, construction phase lengths, and other factors. Since multiple projects may occur at the same time, all construction phases were conservatively assumed to overlap. Construction emissions were estimated based on activity in year 2024. Due to the changeover in construction fleets as older equipment is replaced with newer, cleaner equipment, it is anticipated that maximum daily emissions would decrease as development occurs beyond 2024.[14]

Modeled construction emissions are shown below in **Table IV.B-6**, **Maximum Regional and Localized Daily Construction Emissions**. Regional thresholds and LSTs for each air pollutant are also shown for comparison. As noted earlier, LSTs for a two-acre project size were conservatively utilized based on the area of the estimated uses, but it is more likely that construction projects would be spread across the 43.8-acre Specific Plan area and not concentrated in a single two-acre location. As shown, the Project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Local emissions also would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's construction-related emissions impacts on regional and localized air quality would be less than significant.

[14] *For example, according to CARB, Tier 0 (uncontrolled), Tier 1, and Tier 2 off-road diesel vehicles make up one third of the statewide fleet reported to CARB but contributed to 60 percent of NOX and PM emissions in 2022. CARB's 2022 Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation would phase out this equipment in large fleets by 2028, medium fleets by 2030, and small fleets by 2032, substantially reducing NO_X and PM emissions.*

Table IV.B-6
Maximum Regional and Localized Daily Construction Emissions

	Emissions (pounds/day)					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
Summer 2024	2.76	52.6	56.9	0.11	8.03	3.69
Winter 2024	2.76	52.9	56.0	0.11	8.03	3.69
Maximum Regional Emissions	2.76	52.9	56.9	0.11	8.03	3.69
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Demolition	1.61	15.6	16.0	0.02	2. 5	0.90
Grading	1.65	15.9	15.4	0.02	2.58	1.57
Building Construction	1.13	9.44	10.1	0.02	0.37	0.34
Paving	0.53	4.90	6.53	0.01	0.23	0.21
Architectural Coating	22.25	0.91	1.15	<0.01	0.03	0.03
Maximum Combined Emissions	27.17	46.75	49.18	0.07	5.71	3.05
Localized Significance Threshold	-	131	967	-	8	5
Exceeds Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: NTEC, 2023.

(2) Operations Emissions

As explained earlier and shown in **Table IV.B-5**, **Specific Plan Buildout, Average, and Worst-Case Construction Estimates**, implementation of the Downtown Specific Plan Update would allow for an additional 130,000 square feet of retail and restaurant land uses, 200,000 square feet of office space, 24,000 square feet of medical office space, and 300 residential units within the Specific Plan area. Emissions associated with these additional uses were also calculated using CalEEMod version 2022. Three scenarios were modeled, each of which assumes full buildout of these allowable uses: 2024, 2030, and 2040. The 2024 buildout scenario is hypothetical and shown for informational purposes: reasonably, full buildout would not occur by 2024. The 2030 scenario represents an aggressive scenario in which full buildout occurs by 2030, which is also unlikely but nonetheless theoretical. The 2040 scenario demonstrates what emissions would be by the horizon year. Taken together, the scenarios demonstrate (1) that the Project's maximum daily emissions would not exceed SCAQMD's regional significance thresholds or LSTs and (2) that operational emissions would decrease over the course of the Project's lifetime.

As shown below in **Table IV.B-7**, **Regional and Localized Operational Emissions**, the Project's maximum daily emissions – even under the 2024 scenario – would not exceed SCAQMD's regional significance thresholds NO_X, CO, PM_{10}, and $PM_{2.5}$ or LSTs for NO_X, CO, PM_{10}, and $PM_{2.5}$. The only potential exceedance shown is for regional VOC emissions during the 2024 scenario, but, as explained earlier, the 2024 buildout scenario is a hypothetical scenario with no potential to occur because full buildout could not be achieved by 2024. If buildout occurs by 2030 (a conservative assumption), declines in VOC emissions from vehicle fleets would ensure that the Project's VOC emissions are below the SCAQMD regional threshold for this pollutant. VOC emissions would continue to decline through 2040 due to ongoing reductions in VOC emissions from vehicle fleets. This decline also highlights the second point, which is that emissions associated with the Project – especially VOC, NO_X, and CO emissions – would decline over time

primarily due to declining emissions from the mobile source sector, which can be attributed to factors such as the increasing penetration of newer vehicles with better efficiency and exhaust

Table IV.B-7
Regional and Localized Operational Emissions

	Emissions (pounds/day)					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Full Buildout – 2024						
Mobile	38.6	37.3	385	0.88	78.7	20.4
Area	19.2	0.30	32.3	<0.01	0.04	0.03
Energy	0.14	2.58	1.81	0.02	0.20	0.20
Total Regional Emissions:[a]	58.0	39.9	419	0.90	79.0	20.6
Full Buildout - 2030						
Mobile	29.3	24.2	289	0.78	78.5	20.2
Area	19.1	0.29	32.5	<0.01	0.04	0.03
Energy	0.14	2.58	1.81	0.02	0.20	0.20
Total Regional Emissions:[a]	48.6	26.8	323	0.79	78.7	20.4
Full Buildout - 2040						
Mobile	22.6	16.4	232	0.69	78.2	20.0
Area	19.1	0.29	32.5	<0.01	0.03	0.03
Energy	0.14	2.58	1.81	0.02	0.20	0.20
Total Regional Emissions:[a]	41.9	19.0	266	0.70	78.4	20.2
Maximum Regional Emissions	**58.0**[b]	**39.9**	**419**	**0.90**	**79.0**	**20.6**
Regional Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**[b]	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Full Buildout - 2024	19.34	2.88	34.11	0.02	0.24	0.23
Full Buildout - 2030	19.24	2.87	34.31	0.02	0.24	0.23
Full Buildout - 2040	19.24	2.87	34.31	0.02	0.23	0.23
Maximum Regional Emissions	**19.34**	**2.88**	**34.31**	**0.02**	**0.24**	**0.23**
Localized Significant Thresholds	**-**	**91**	**664**	**-**	**1**	**1**
Exceeds Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[a] Some emissions may not add up due to rounding and differences between summer and winter emissions.
[b] See discussion regarding VOC emissions. The 2024 full buildout scenario represents a hypothetical scenario. VOC emissions resultant from Project operations would be below SCAQMD thresholds.
Source: NTEC, 2023.

emission control systems in the statewide fleet, and the increasing share of electric vehicles (EVs) within the statewide fleet. Declines in area and energy-related emissions would also be expected to occur as the State transitions away from natural gas appliances and as electricity providers (such as Southern California Edison) transition to 100 percent clean energy, but the effect of these transitions is not accounted for in the CalEEMod criteria pollutant analysis. Given these considerations, the Project's emissions of criteria pollutants, including VOC, would be below SCAQMD regional thresholds and LSTs and therefore less than significant.

(3) Criteria Pollutant Emissions Summary – Health Impact

As shown, the Project's construction and operations emissions would not exceed applicable SCAQMD regional thresholds and LSTs. And as discussed earlier, these SCAQMD thresholds represent the maximum emissions that would not be expected to cause or materially contribute

to an exceedance of NAAQS or CAAQS, which themselves represent the maximum concentrations of criteria pollutants that can be present in outdoor air without any harmful effects on people or the environment. Therefore, neither the Project's construction nor operations emissions of criteria pollutants would be expected to cause or measurably contribute to adverse health impacts, and the Project's construction and operations criteria pollutant emissions impacts on regional and localized air quality would be less than significant and no mitigation would be required.

Threshold (c): Would the Project expose sensitive receptors to substantial pollutant concentrations?

(1) Construction Emissions

As discussed previously, the Project's construction-related criteria pollutant emissions would not exceed SCAQMD regional significance thresholds. Construction-related criteria pollutant emissions also would not exceed SCAQMD LSTs, meaning that nearby sensitive receptors generally located within 25 meters or farther from construction sites would not be exposed to substantial criteria pollutant concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be emitted from the exhaust pipes of diesel-powered construction vehicles and equipment. Construction activities emitting diesel PM would occur intermittently over the approximately 25-year buildout period associated with the Project. Further, development projects would be scattered throughout the 43.8-acre Specific Plan area and not consistently located adjacent to or near a specific sensitive receptor.[15] Thus, the previously identified sensitive receptors would only be exposed to construction-related DPM emissions for a fraction of the approximately 25-year buildout period. Because individual cancer risk is based on exposure to concentrations of TACs over a 30-year period, the likelihood that exposure of individuals to TAC concentrations resultant from the Project's intermittent construction activities would result in significant cancer risks is low. Further, as shown earlier, the maximum daily PM emissions associated with the Project's construction activities, which include exhaust PM, would not exceed applicable regional thresholds and LSTs.[16] Given these considerations, construction-related TAC emissions are expected to result in less than significant health risk impacts and no mitigation would be required.

(2) Operations Emissions

As discussed previously, the Project's operational criteria pollutant emissions would not exceed SCAQMD regional significance thresholds or LSTs.

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[15] *For example, one project may be located within 100 feet of a sensitive receptor, and another project may be located 1,000 feet from that same sensitive receptor.*

[16] *It is additionally worth reiterating the conservative nature of that analysis, which assumes that 10 percent of Project buildout would be constructed at once, and that every construction phase associated with buildout would occur simultaneously. Thus, the PM emissions estimated by that analysis can be considered conservative, worst-case estimates.*

The Project does not propose sources of acutely and chronically hazardous TACs, such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. Neither CARB nor the SCAQMD identify the types of retail, commercial, office, and residential uses proposed by the Project as sources of substantial TAC emissions. As a result, the operations of these uses would not warrant the need for a health risk assessment, and this TAC-related impact would be less than significant and no mitigation would be required.

Regarding CO Hotspots: though the Project would generate traffic that produces and contributes to off-site CO emissions, Project traffic generation would not result in exceedances of CO air quality standards at nearby roadways due to three key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet. As shown earlier in **Table IV.B-1, Ambient Air Quality Data – SRA No. 3 "Southwest Coastal Los Angeles County"**, CO levels in the Project area are well-below federal and State standards, as are CO levels in the air basin itself. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the air basin is currently designated as a CO attainment area for both CAAQS and NAAQS. Finally, the Project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. Therefore, the Project's potential to expose sensitive receptors to substantial CO concentrations as a result of CO hotspots would be less than significant and no mitigation would be required.

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

Land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, food processing facilities, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The Project does not involve such land uses. Therefore, the Project's potential to result in objectionable odors adversely affecting a substantial number of people would be less than significant and no mitigation would be required.

6. Cumulative Impact Analysis

a) Construction

As discussed under the thresholds above, the Project's construction-related air quality emissions and cumulative impacts would be less than significant. The Project would comply with regulatory requirements. Furthermore, construction-related daily emissions at the Project Site would not exceed any of SCAQMD's regional or localized significance thresholds. Therefore, the contribution of the Project to cumulative air quality impacts from construction emissions would not be cumulatively considerable and, therefore, would be less than significant and no mitigation would be required.

As explained earlier, construction activities emitting diesel PM would occur intermittently over the approximately 25-year buildout period associated with the Project and would be scattered throughout the 43.8-acre Specific Plan area, meaning that construction activities would not be

consistently located adjacent to or near a specific sensitive receptor. Thus, the previously identified sensitive receptors would only be exposed to construction-related DPM emissions for a fraction of the approximately 25-year buildout period. And because individual cancer risk is based on exposure to concentrations of TACs (including diesel PM) over a 30-year period, the likelihood that exposure of individuals to TAC concentrations resultant from the Project's intermittent construction activities would result in significant cancer risks would be low. Related projects located outside the 43.8-acre Specific Plan area would be even further geographically dispersed from sensitive receptors, lessening the likelihood that related projects' construction-related TAC emissions would contribute substantially to significant cancer risks at shared sensitive receptors.

Overall, construction activities are temporary and short-term events, thus construction activities at each related project would not result in a long-term substantial source of TAC emissions. Additionally, SCAQMD's CEQA Air Quality Handbook and SCAQMD's supplemental online guidance/information do not require a Health Risk Assessment for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. As such, given the short-term nature of these activities, cumulative TAC emissions impacts of the Project's construction would be less than significant and no mitigation would be required.

b) Operation

Cumulative projects include local development as well as general growth within the Project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. Accordingly, the cumulative analysis for the Project's air quality is regional in nature. Put another way, the SCAQMD's regional significance thresholds account for a project's potential to result in cumulatively considerable impacts to regional air quality. In accordance with this SCAQMD methodology, emissions from individual projects that do not exceed the SCAQMD thresholds are not considered individually or cumulatively significant. As demonstrated earlier, the Project operations would not generate emissions that are in excess of SCAQMD's regional significance thresholds. Therefore, Project operations would not contribute to significant cumulative air quality impacts related to criteria pollutant emissions. This impact would be less than significant and no mitigation would be required.

Regarding TACs, the Project does not propose uses that would include substantial sources of TAC emissions. The operations of the Project's proposed uses would not warrant the need for a health risk assessment, and they would not meaningfully contribute to cumulatively considerable TAC concentrations and associated cancer risks. This impact would also be less than significant and no mitigation would be required.

Since the Project would not introduce any substantial stationary sources of emissions, CO is the benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. As indicated earlier, no violations of the State and federal CO standards are projected to occur for the Project, based on the magnitude of traffic the Project is anticipated to

create. Therefore, operation of the Project would not result in a cumulatively considerable net increase for non-attainment of criteria pollutants or ozone precursors. As a result, the Project would result in a less than significant cumulative impact for operational emissions and no mitigation would be required.

7. Mitigation Measures

Project-level and cumulative impacts with regard to air quality would be less than significant. Therefore, no mitigation measures are required.

8. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to air quality would be less than significant.

9. References

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USEPA, Criteria Air Pollutants, website: www.epa.gov/criteria-air-pollutants. Accessed September 2023.

IV. Environmental Impact Analysis

C. Cultural Resources

1. Introduction

This section describes the existing cultural resources conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. This section is based on information provided in **Appendices D.1, D.2, and D.3,** of this Draft EIR, which includes the *Downtown Specific Plan Update El Segundo, California, Historical Resource Technical Report* (Historical Report) prepared by Teresa Grimes, dated December 2023, written correspondence with the Natural History Museum, and written correspondence with the South Central Coastal Information Center (SCCIC), respectively. The Historical Report includes the results of a review of the Built Environment Resources Directory (BERD); building development and archival research; and City of El Segundo designation criteria and integrity requirements. The Historical Report was prepared in conformance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5 for historical resources and all applicable local guidelines and regulations and is summarized in this section of the Draft Environmental Impact Report (EIR). Other sources consulted are listed in **Section IV.C.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Historic Resources

Prior to El Segundo's incorporation in 1917, the area was part of the 1822 Spanish land grant for Rancho Sausal Redondo, which extended from the present-day communities of Playa del Rey on the north, Inglewood on the east, and Hermosa Beach on the south. The nearly 25,000 acres of land consisted of wheat and barley fields on which cattle and sheep grazed. Standard Oil bought 840 acres on June 11th, 1911 for their refinery, which was called El Segundo (Spanish for "the second one").[1] The same time Standard Oil was constructing their new refinery, the El Segundo Land and Improvement Company was platting a new townsite.

[1] *The company's first refinery in Richmond had been dubbed El Primera.*

For the first years after incorporation, the local economy of El Segundo was focused solely on the oil industry. During this period, the City was sparsely developed with single-family houses scattered on lots between Main Street and Loma Vista Street on the east and west and Mariposa Avenue and El Segundo Boulevard on the north and south. A small business district began to form on Richmond Street between Grand Avenue on the north and El Segundo Boulevard on the south. The population grew from 1,563 in 1920 to 3,503 in 1930. A City hall and library were constructed at the northwest corner of Richmond Street and Franklin Avenue and more commercial buildings were constructed along Grand Avenue. Although the original city hall and library have been demolished, the annex remains on Franklin Avenue.

The refinery in El Segundo benefitted from the Southern California oil booms of the 1920s and by the 1930s, Standard Oil of California began using the "Chevron" name for service stations and oil products, later transitioning to "Calso" in the 1940s and 1950s, before returning to "Chevron". The Chevron Refinery currently occupies approximately one-third of the City in an area south of El Segundo Boulevard and west of Pacific Coast Highway.

The City remained a one-industry town until the 1920s, when Mines Field, a landing strip for early aviators north of El Segundo, was chosen as the site for the new Los Angeles Municipal Airport. Private enterprises quickly began to construct factories in the area and the aviation industry began to rival the oil industry as the economic engine of El Segundo.

Between 1940 and 1955, El Segundo became a world class industrial center. The population grew from 3,738 in 1940 to 8,011 in 1950 as a result of an influx of workers in the aviation and defense industries. During the postwar period, Downtown expanded northward. While commercial development remained small in scale, the nucleus shifted from the 100 and 200 blocks of Richmond Street south of Grand Avenue to the 300 and 400 blocks of Main Street north of Grand Avenue. Plans for a new Fire Station and Police Station at Main Street and Grand Avenue were prepared in 1948. Lacking funds for both, the City Council opted for the construction of Fire Station No. 1, which was completed in 1951. The Civic Center was completed in 1956 with the dedication of the new Police Station and City Hall.[2]

Smoky Hollow, east of Downtown and north of the Chevron Refinery, rapidly developed into an industrial district after World War II due to the influence of local aerospace companies and general demand for manufacturing, distribution, and industrial service uses. The district was largely built out by the early 1960s.

Beginning in the 1980s, commercial and office buildings began to appear along Sepulveda Boulevard, between Grand Avenue and El Segundo Boulevard. In 1980, a large business park on the northeast corner of Grand Avenue and Sepulveda Boulevard (Pacific Coast Hwy) was established with three large, concrete, and tinted glass buildings. One of the most notable developments was the construction of the Pacific Corporate Towers at Pacific Coast Highway and Grand Avenues, built in 1983. That same year, 144 additional commercial properties were built in El Segundo, totaling over 1 million square feet of commercial space. In 1990, toy company, Mattel, moved its world headquarters to El Segundo, also just off Sepulveda Boulevard. In the late 1990s,

[2] *"El Segundo City Hall Dedication Date Set," Los Angeles Times, January 9, 1956.*

strip malls with anchoring groceries stores filled in the remaining available space along Sepulveda Boulevard.

A detailed historic setting is provided in the Historical Report (see **Appendix D.1**).

(1) Project Site

(a) Reconnaissance Survey Findings

A reconnaissance survey of the Specific Plan area was conducted from the public right-of-way in November of 2021. Properties that were previously identified in the 2000 Specific Plan as potentially significant and properties over 45 years of age with the potential to qualify for listing under federal, State, and local landmark and historic district programs were assigned preliminary Status Codes, which is a system for recording and classifying historical resources developed by OHP (refer below to subheading SOHP Survey Methodology for additional details). There are 103 parcels in the Specific Plan area with buildings constructed before 1977. Some parcels contain more than one building, while some buildings occupy more than one parcel. A complete list of properties is included in Appendix B of the Historical Report, which can be found in **Appendix D.1** of this Draft EIR, and a summary of the survey findings follows:

Individual Properties Potentially Eligible as Historical Resources

Four properties in the Specific Plan area appear to be individually eligible as historical resources.

- **105 W. Grand Avenue:** The property located at 105 W. Grand Avenue, built in 1928, appears to be eligible for listing in the El Segundo Register as it is over 50 years of age and reflects the commercial development of Downtown during the 1920s. The property is a rare remaining example of a mixed-use commercial building and is prominently situated at the corner of Grand Avenue and Main Street. The building may not retain sufficient integrity for listing in the National and California Registers as a result of storefront alterations. The Status Code is 5S3. Status Codes are defined on page IV.C-16.

- **140 Richmond Street:** The property located at 140 Richmond Street, built in 1921, appears to be eligible for listing in the El Segundo Register as it is over 50 years of age and reflects the commercial development of Downtown during the 1920s. The property is a rare remaining example of a theater that was originally a live performance venue called the State Theater. The theater was adapted for motion picture viewing but closed in the mid-1930s. In 1944, it reopened as the El Segundo Theater and in 1957 the State Theater name was restored. It has operated as the Old Town Music Hall since 1968 and specializes in concerts and silent films accompanied live on a Mighty Wurlitzer pipe organ. The building may not retain sufficient integrity for listing in the National and California Registers as a result of alterations to the facade. The property is also contributing to a potential historic district on Richmond Street. The Status Code is 5S3/5D3.

- **203 Richmond Street:** The property located at 203 Richmond Street, built in 1925, appears to be eligible for listing in the National, California, and El Segundo Registers as it is over 50 years of age and reflects the institutional development of the City. The property

was the former location of the first El Segundo City Hall and Library. The building retains sufficient integrity to convey its significance as the City Hall Annex. The property is also contributing to a potential historic district on Richmond Street. The Status Code is 3S/3CS/5S3/5D3.

- **218 – 220 Richmond Street**: The property located at 218 – 220 Richmond Street, built in 1915, appears to be eligible for listing in the National, California, and El Segundo Registers as it is over 50 years of age and reflects the commercial development of Downtown during the 1910s. The building retains sufficient integrity to convey its significance as one of the few remaining examples of a mixed-use commercial building from the period. The property is also contributing to a potential historic district on Richmond Street. The Status Code is 3S/3CS/5Ss3/5D3.

Potentially Eligible Historic District

One group of properties in the Specific Plan area appears to be collectively eligible as a historic district. They are located on the 100 and 200 blocks of Richmond Street and reflect the earliest commercial development in El Segundo. Constructed between 1915 and 1947, the buildings are one and two stories in height and mostly unreinforced masonry construction. There are 27 Assessor Parcel Numbers listed in **Table IV.C-1, Properties in Potentially Eligible Historic District** and shown in **Figure IV.C-1, Potential Historic District**. However, in some cases there may be more than one building on the property. There are 16 contributing properties and 11 non-contributing properties. Of the 11 non-contributing properties 9 are occupied by buildings and two are surface parking lots. The non-contributing properties were constructed in the late twentieth and early twenty-first centuries, but are compatible with the height, scale, and massing of the contributing properties. The historic district appears to be eligible for listing in the El Segundo Register as the buildings are over 50 years of age and reflect the prewar commercial development of Downtown. The historic district may not retain sufficient integrity for listing in the National and California Registers as a result of storefront alterations as well as the demolition of three buildings in 2004.

Table IV.C-1
Properties in Potentially Eligible Historic District

APN	Address	Build Date	Status Code	Notes	Map Key No.
4136-025-020	116-122 W. Grand Ave.	1923	5d3	The Assessor shows three buildings on this parcel constructed in 1923, 1951, and 1974; however, there are two buildings on the 1929 Sanborn map.	1a
	130 W. Grand Avenue	1923	5d3		1b
	230 Richmond St.	1974	6z		1c
4136-025-003	222 Richmond St.	1947	5d3		2
4136-025-004	218-220 Richmond St.	1915	5d3	This address range historically included the two-story building on this parcel, but now seems include the one-story portion that was	3a

Table IV.C-1
Properties in Potentially Eligible Historic District

APN	Address	Build Date	Status Code	Notes	Map Key No.
				historically associated with the address 216.	
	216 Richmond St.	1920	5d3	The Assessor build date is 1920; however, this one-story building is not present on the 1929 Sanborn map.	3b
4136-025-900	N/A	N/A	6z	Parking lot.	4
4136-024-015	202 W. Grand Ave.	1925	5d3	Substantially altered in 1945, but retains integrity from period of significance.	5
4136-024-014	225 Richmond St.	1924	5d3		6
4136-024-013	223 Richmond St.	1922	5d3		7
4136-024-012	221 Richmond St.	1926	6z	Substantially altered in 1960, and appears to be recently remodeled.	8
4136-024-011	215 Richmond St.	1925	6z	Substantially altered in 1960, and appears to be recently remodeled.	9
4136-024-010	211-213 Richmond St.	1923	5d3		10
4136-024-009	N/A	N/A	6z	Parking lot.	11
4136-024-008	209 Richmond St.	1920	5d3		12
4136-024-017	203 Richmond St.	1925	5d3	City Hall Annex, also individually eligible.	13
4136-026-001	146 Richmond St.	1915	5d3	The Assessor shows one building on this parcel, but the 1929 Sanborn map shows two.	14a
	144 Richmond St.	1915	5d3		14b
4136-026-002	142 Richmond St.	1968	6Z		15a
	140 Richmond St.	1921	5d3	Old Town Music Hall, also individually eligible.	15b
4136-027-021	147 Richmond St.	1988	6z		16
4136-027-020	145 Richmond St.	1915	5d3		17
4136-027-019	143 Richmond St.	1923	5d3		18
4136-027-018	139 Richmond St.	1923	5d3		19
4136-027-017	135 Richmond St.	2016	6z		20
4136-027-016	133 Richmond St.	2016	6z		21
4136-027-015	131 Richmond St.	1920	5d3		22
4136-027-032	127 Richmond St.*	2004	6z	The building on this property was identified as a Historic Structure in the 2000 Specific Plan, but was apparently demolished.	23
4136-027-033	125 Richmond St.*	2004	6z	The building on this property was identified as a Historic Structure	24

Table IV.C-1
Properties in Potentially Eligible Historic District

APN	Address	Build Date	Status Code	Notes	Map Key No.
				in the 2000 Specific Plan, but was apparently demolished.	
4136-027-034	123 Richmond St.*	2004	6z	The building on this property was identified as a Historic Structure in the 2000 Specific Plan, but was apparently demolished.	25
4136-027-035	121 Richmond St.*	2004	6z		26
4136-027-011	117 Richmond St.	1922	5d3		27a
	115 Richmond St.	1918	5d3		27b
** These four parcels are now occupied by a single building.*					

b) Paleontological Resources

Paleontological resources are the evidence of once-living organisms as preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). In general, fossils are considered to be greater than 5,000 years old (older than Middle Holocene) and are typically preserved in sedimentary rocks that underlie the soil layer.[3]

The Project Site is located in the Los Angeles Basin of coastal Southern California, one of several deep Cenozoic era basins that occupy the region. Pliocene rock units in the vicinity of El Segundo have yielded abundant marine mega-invertebrates, primarily snails and clams. The upper Pleistocene consists of nonmarine and shallow near-shore marine, including the Palos Verde Sand. Several sites have produced abundant marine mega-invertebrates (snails, clams) along the Ballona Escarpment at the southern edge of the City. Thirteen vertebrate fossil sites occur in the Quaternary deposit and consist of unnamed alluvial units. Several important Pleistocene ("Ice Age") land fauna mammals have been recovered from the study area, and have been correlated with the Rancholabrean North American Land mammal Age (circa 10,000-40,000 years ago), which is based on the Rancho La Brea fauna.[4]

[3] *Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources: Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee, 2010.*

[4] *City of El Segundo General Plan EIR, December 1991.*

Source: Teresa Grimes, May 2023.

Figure IV.C-1
Potential Historic District

To determine whether fossil localities have been previously discovered in the vicinity of the Project Site or a particular rock unit, records of Natural History Museum of Los Angeles County (NHMLA) vertebrate localities were reviewed (refer to **Appendix D.3** of this Draft EIR). Museum records indicate that no previously recorded vertebrate paleontological localities lie directly within the boundaries of the Specific Plan area. However, nearby finds include pismo clam, elephant clade, mammoth, bison, hare, and unspecified invertebrates.[5] Many of these localities are in Pleistocene marine terrace in the Palos Verdes Sand/San Pedro formation.

c) Archaeological Resources

(1) Records Search Results

Archaeological resources represent and document activities, accomplishments, and traditions of previous civilizations and link current and former inhabitants of an area. Archaeological resources may date from the historic or prehistoric period and include deposits of physical remains of the past (e.g., artifacts, manufacturing debris, dietary refuse, and the soils in which they are contained) or areas where prehistoric or historic activity measurably altered the earth.

To identify known archaeological resources and prior studies within the project vicinity, a record search was conducted at the SCCIC of the California Historical Resources Information System at California State University, Fullerton on June 26, 2023 (refer to **Appendix D.2,** of this Draft EIR). The search included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. Additional sources consulted during the SCCIC records search include: the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), and the California State Built Environment Resources Directory (BERD) listings. The results of the literature and records search indicate that at least 17 previous cultural resource surveys have occurred within a 0.5-mile radius of the Project Site. No archaeological resources have been recorded on the Project Site.[6]

(2) Sacred Lands File Search

The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on September 22, 2023, to request a search of the SLF. The NAHC responded to the request in a letter dated November 14, 2023. The NAHC's letter states that sites are not known to be located within the Project area. Therefore, the results of the SLF check conducted through the NAHC was negative.[7]

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[5] *Natural History Museum of Los Angeles County, Vertebrate Paleontological Section, Paleontological resources for an unnamed Project in Downtown El Segundo, CA, December 11, 2022.*

[6] *South Central Coastal Information Center, California State University – Fullerton, Department of Anthropology, Records Search Result for Various APNs in Downtown El Segundo, June 26, 2023.*

[7] *State of California, Native American Heritage Commission, Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes § 65352.3 and §65352.4, as well as Assembly Bill 52*

In compliance with the requirements of AB 52, and SB 18; the City of El Segundo Community Development Department provided formal notification of the Project on January 12, 2023 to the following California Native American tribes:

1. Gabrielino-Tongva Tribe
2. Gabrielino /Tongva Nation
3. Gabrielino Tongva Indians of California Tribal Council
4. Gabrieleno/Tongva San Gabriel Band of Mission Indians
5. Gabrieleno Band of Mission Indians – Kizh Nation

The City has met its AB 52 and SB 18 requirements to notify the tribes and consultation has been completed. Refer to **Section IV.M, Tribal Cultural Resources**, of this Draft EIR for further information.

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."[8]

(a) Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

A. Are associated with events that have made a significant contribution to the broad patterns of our history; or

B. Are associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(AB52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, El Segundo Downtown Specific Plan Project, Los Angeles County, November 14, 2023.

[8] *Title 36 Code of Federal Regulations Part 60.2.*

D. Have yielded, or may be likely to yield, information important in prehistory or history.

(b) Context

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear."[9] A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

(c) Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as "the ability of a property to convey its significance."[10] Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

(d) Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties."[11]

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.[12] A district's significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;

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9 *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: U.S. Department of the Interior, 1997), page 7.*

10 *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: U.S. Department of the Interior, 1997), page 44.*

11 *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: U.S. Department of the Interior, 1997), page 44.*

12 *Title 36 Code of Federal Regulations Part 60.3 (d).*

- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.[13]

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.[14]

(e) Criteria Consideration G

Certain types of properties are not usually eligible for listing in the National Register. These properties include buildings and sites that have achieved significance within the past 50 years. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. In addition to being significant under one of the four criteria listed above, these properties must meet a special requirement called a criteria consideration in order to be eligible for listing in the National Register. There are seven criteria considerations. Criteria Consideration G states "a property achieving significance within the last 50 years is eligible if it is of exceptional importance."[15] This criteria consideration guards against the listing of properties of fleeting contemporary interest.

(2) Secretary of the Interior's Standards

Projects that may affect historical resources are considered to have a less than significant impact if they are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards).[16] Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards.[17] The Standards were issued by the National Park Service and are accompanied by Guidelines for four types of treatments: Preservation, Rehabilitation, Restoration, and Reconstruction. The most common treatment is rehabilitation, which is defined as "the act or process of making possible a compatible use for a property through

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[13] *National Register Bulletin #21: Defining Boundaries for National Register Properties (Washington D.C.: U.S. Department of the Interior, 1995), page 12.*
[14] *National Register Bulletin #16: How to Complete the National Register Registration Form (Washington D.C.: U.S. Department of the Interior, 1997), page 16.*
[15] *National Register Bulletin #16: How to Complete the National Register Registration Form (Washington D.C.: U.S. Department of the Interior, 1997), page 41.*
[16] *Title 14 California Code of Regulations § 15126.4 (b).*
[17] *Title 14 California Code of Regulations § 15331.*

repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."[18] The Standards for Rehabilitation assume that at least some repair or alteration of the historic resource will be needed in order to provide for continued or new uses.

The Standards of Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

[18] *Anne E. Grimmer, The Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Washington, D.C.: U.S. Department of Interior, National Park Services, Technical Preservation Services, 2017), page 2.*

10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

It is important to note that the Standards are not intended to be prescriptive, but instead provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, nor is it necessary to comply with every Standard to achieve compliance.

(3) Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies to return Native American cultural items to the appropriate Federally recognized Indian tribes or Native Hawaiian groups with which they are associated.[19]

(4) Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.[20]

(5) Archeological Data Preservation Act

The Archaeological Data Preservation Act (ADPA) requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

b) State

(1) California Environmental Quality Act

CEQA defines a historical resource as a property listed in the California Register of Historical Resources (California Register) or determined to be eligible for listing in the California Register by the State Historical Resource Commission. A property designated under a local preservation

[19] *United States Department of the Interior, National Park Service, Native American Graves Protection And Repatriation Act, website: https://www.nps.gov/subjects/archeology/napgra.htm. Accessed March 2023.*

[20] *United States Department of the Interior, National Park Service, Technical Brief # 20: Archeological Damage Assessment: Legal Basis and Methods, 2007, website: https://www.nps.gov/subjects/archeology/upload/tchBrf20_508.pdf. Accessed March 2023.*

ordinance or identified as eligible in a historic resource survey is presumed to be a historical resource unless a preponderance of evidence demonstrates that the property is not architecturally, historically, or culturally significant.[21] The lead agency has the discretion to treat a property as a historical resource if it meets statutory requirements and substantial evidence supports the conclusion. Thus, there are three categories of historical resources:

- *Mandatory historical resources* are properties listed or determined to be eligible for listing in the California Register by the State Historical Resource Commission.[22] The California Register automatically includes properties listed and formally determined to be eligible for listing in the National Register of Historic Places (National Register) as well as some California State Landmarks and Points of Historical Interest.

- *Presumptive historical resources* are properties included in a local register of historical resources as defined by subdivision (k) of Section 5020.1 of the Public Resources.[23] The El Segundo Historic Preservation Ordinance (Chapter 15-14 of the Municipal Code) meets the requirements of this subdivision. However, as of the date of this report, no properties in the proposed Downtown Specific Plan area have been listed in the El Segundo Register of Cultural Resources (El Segundo Register). Presumptive historical resources also include properties deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 of the Public Resources Code, unless a preponderance of the evidence demonstrates that the property is not significant. Subdivision (g) pertains to the requirements for the nomination historic resource surveys for listing in the California Register.[24] However, as of the date of this report, El Segundo has not been comprehensively surveyed for historical resources.

- *Discretionary historical resources* are properties determined to be eligible for listing in the California Register by the lead agency. The determination must be supported by substantial evidence in light of the whole record.[25]

The California Register and El Segundo Register designation programs are discussed below.

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[21] *Public Resources Code § 5024.1 and Title 14 California Code of Regulations § 4850 & § 15064.5 (a) (2).*

[22] *Title 14 California Code of Regulations § 15064.5 (a) (1).*

[23] *A local register of historical resources is defined as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.*

[24] *A resource identified as significant in a historical resource survey may be listed in the California Register if the survey meets all of the following criteria:*
1. *The survey has been or will be included in the State Historic Resources Inventory.*
2. *The survey and the survey documentation were prepared in accordance with office procedures and requirements.*
3. *The properties were evaluated and determined by the office (SHOP) to have a significance rating of Category 1 to 5 on DPR Form 523.*
4. *If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the integrity of the resource.*

[25] *Title 14 California Code of Regulations § 15064.5 (a) (3) (4).*

(2) California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.[26]

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.[27]

(a) Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:[28]

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the

[26] *Public Resources Code § 5024.1 (a).*
[27] *Public Resources Code § 5024.1 (d).*
[28] *Public Resources Code § 5024.1 (c).*

California Register. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data. [29]

(b) SOHP Survey Methodology

The evaluation instructions and classification system prescribed by SOHP for recording historical resources provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Codes referred to in this analysis are as follows:

3S Appears eligible for the National Register as an individual property through survey evaluation.
3CS Appears eligible for the California Register as an individual property through survey evaluation.
5S3 Appears to be individually eligible for local listing or designation through a survey evaluation.
5D3 Appears to be a contributor to a district that appears eligible for local listing or designation through a survey evaluation.
6Z Found ineligible for National Register, California Register, or local designation through survey evaluation.
7K Resubmitted to OHP for action but not reevaluated.

[29] *Title 14 California Code of Regulations § 4852 (c).*

(3) California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

(4) California Public Resources Code (PRC)

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities accounting for the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

c) Local

(1) El Segundo Register of Cultural Resources

In 1993, the City of El Segundo adopted the El Segundo Historic Preservation Ordinance.[30] The Ordinance provides for the identification, protection, enhancement, and preservation of properties that reflect special elements of the City's heritage. The Ordinance is enforced by the Planning Commission, which maintains the local register of cultural resources. A property may be listed as a Cultural Resource with the written consent of the owner, if it meets one or more of the following criteria:

1. Must be at least fifty (50) years old; and
2. It is associated with persons or events significant in local, State, or national history; or
3. It reflects or exemplifies a particular period of national, State, or local history; or

[30] *Ordinance No. 1193 and Chapter 20.52 of the Municipal Code.*

4. It embodies the distinctive characteristics of a type, style, period of architecture, or method of construction.

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. As of the date of this report, no properties in El Segundo have been designated cultural resources.

(2) El Segundo Municipal Code

Section 15-14-3 (Designation of Cultural Resources) of the El Segundo Municipal Code ESMC) provides procedures for designation of cultural resources within the City. ESMC Section 15-4-4 establishes a list of designated cultural resources (corresponds to the El Segundo Register of Cultural Resources discussed above) to be maintained by the Community Development Department. Under Section 15-14-3, requests for designation of a cultural resource are voluntary and may be made by or with the written consent of the property owner. The designation of a cultural resource is strictly voluntary, not mandatory.

(3) El Segundo General Plan Land Use Element

The City of El Segundo General Plan includes a Land Use Element that recognizes the City's responsibility for preserving and enhancing its cultural, historical, and architectural heritage. Goals, objectives, and policies related to the proposed Downtown Specific Plan include the following:

Goal LU1: Maintain El Segundo's "small town" atmosphere, and provide an attractive place to live and work.

Objective LU1-4: Preserve and maintain the City's Downtown and historic areas as integral to the City's appearance and function.

Goal LU2: Preserve and enhance the City's cultural heritage and buildings or sites that are of cultural, historical, or architectural importance.

Objective LU2-1: Maintain the distinct character of the existing areas of the City.

Policy LU2-1.1: New development adjacent to a building of cultural, historical, or architectural significance shall be designed with a consistent scale and similar use of materials.

Objective LU2-2: Encourage the preservation of historical and cultural sites and monuments.

Policy LU2-2.1: Take an active role in documenting and preserving buildings of cultural, historical, and architectural significance. This should include residential, non-residential, and publicly owned buildings.

Program LU2-2:.1A The City shall conduct a thorough survey of all buildings of cultural, historical, or architectural significance within the City.

Program LU2-2.1B: The City shall investigate methods for preserving historical buildings, including overlay zoning districts, historical designations, and national register listings.

Policy LU2-2.2: Take an active role in assisting individual owners or groups in documenting and preserving building of potential cultural, historical, or architectural significance.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to cultural resources are based on Appendix G of the *State CEQA Guidelines*. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to cultural resources would occur if the Project would:

Threshold (a): Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5;

Threshold (b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5; and

Threshold (c): Disturb any human remains, including those interred outside of dedicated cemeteries.

The *CEQA Guidelines* set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

> A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5(b)(1) further clarifies "substantial adverse change" as follows:

> Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

CEQA Guidelines Section 15064.5(b)(2)(C) in turn explains that a historical resource is "materially impaired" when a project:

> Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

As a property conveys its significance as a historical resource through its physical characteristics, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not the project will alter in an adverse manner the integrity of the historical resource such that it would no longer be eligible for listing in the National Register, California Register, or other landmark programs, such as the El Segundo Register of Cultural Resources.

CEQA Guidelines Section 15064.5(b)(3) provides that:

> Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstruction Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

b) Methodology

(1) Historical Resources

This analysis relies upon the methodology utilized for the Historical Report, which can be found in **Appendix D.1** of this Draft EIR, was prepared by professional individuals who meet or exceed the Secretary of the Interior's Professional Qualification Standards in history, architectural history, and historic preservation planning. Project Site inspections and property history research were conducted to document and assist in assessing the existing conditions. The Project's conceptual design plans were reviewed, and visual inspection of the Project Site was conducted.

All applicable professional standards for the identification and evaluation of historic resources were utilized in the preparation of the historic assessment, including (but not limited to):

- Secretary of the Interior's Standards for Preservation Planning
- *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*
- *National Register Bulletin #16: How to Complete the National Register Registration Form*
- *National Register Bulletin #24: Guidelines for Local Surveys: A Basis for Preservation Planning*

- *Instructions for Recording Historical Resources* (State of California Office of Historic Preservation)

The Project Site was evaluated for significance under applicable criteria, including those for the National Register and California Register and local designation programs (see Regulatory Setting, above). The potential impacts of the Project were analyzed in accordance with Section 15064.5 of the *State CEQA Guidelines*. As such, the test for determining whether or not a proposed project would have a significant impact on an identified historical resource is whether or not the project would alter in an adverse manner the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs. Projects that may affect historical resources are considered to have less-than-significant impacts if they are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Though none of the standards apply specifically to new construction in the vicinity of historical resources, Standards #9 and #10 of the Standards for Rehabilitation provide relevant guidance for such projects.

(2) Archeological Resources

To evaluate potential impacts to archaeological resources an archaeological data search was completed by the SCCIC at California State University, Fullerton, which can be found in **Appendix D.2** of this Draft EIR. The SCCIC data incorporates a review of technical records of previous studies and findings related to archaeological resources. The archaeological data search findings, in addition to the thresholds of significance enumerated below, formed the basis of the impact determination.

CEQA provides guidelines for mitigating impacts to archaeological resources in Section 15126.4. According to the CEQA Guidelines, public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered for a project involving such an archaeological site:

(A) Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

(B) Preservation in place may be accomplished by, but is not limited to, the following:

1. Planning construction to avoid archaeological sites;
2. Incorporation of sites within parks, greenspace, or other open space;
3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site;
4. Deeding the site into a permanent conservation easement.

(C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Archeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code. If an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation.

(D) Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.

Typically, such measures will reduce impacts on archaeological resources to less than significant levels.

(3) Paleontological Resources

To determine whether fossil localities have been previously discovered in the vicinity of the Project or a particular rock unit, records of Natural History Museum of Los Angeles County (NHMLA) vertebrate localities were reviewed, which can be found in **Appendix D.2** of this Draft EIR. The NHMLA did a thorough search of paleontology collection records for the locality and specimen data for proposed development at the Project area as outlined on the portion of the Venice United States Geological Survey (USGS) topographic quadrangle map. The paleontological data search findings, in addition to the thresholds of significance enumerated below, formed the basis of the impact determination.

According to the CEQA Guidelines, impacts to paleontological resources are significant when a project is determined to disturb or destroy scientifically important fossil remains, as defined by the Society of Vertebrate Paleontology.[31] Significant paleontological resources are defined as "identifiable" vertebrate fossils, uncommon invertebrate, plant, and trace fossils that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, or biochronological data. These data are important because they are used to examine evolutionary relationships, provide insight on the development of and interaction between biological communities, establish time scales for geologic studies, and for many other scientific purposes.[32]

[31] *Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.*

[32] *Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.*

c) Analysis of Project Impacts

Threshold (a): Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

As described previously, the Specific Plan area does not contain any mandatory or presumptive historical resources. There are not any properties in the Project area listed under federal, State, or local landmark or historic district programs. Furthermore, there are not any properties in the Project area identified as significant pursuant to the criteria set forth in subdivision (g) of Section 5024.1 of the Public Resources Code.

In the reconnaissance survey conducted for the Historical Report in 2021, four properties were identified as appearing to be individually eligible for listing in the California Register as historical resources and one group of properties as appearing to be collectively eligible for listing in the California Register as a historic district. One individually eligible historical resource, the building at 105 W. Grand Avenue, is located in the Main Street District. The other individually eligible historical resources and historic district are located in the Richmond Street District. To provide a conservative analysis of Project impacts, these properties are being treated as discretionary historical resources for the purposes of this analysis. The discussion below analyzes the major components of the Project with regard to the thresholds for impacts on historical resources in Appendix G of the *CEQA Guidelines.*

(1) Private Realm – Land Use and Development Standards

Adoption of the proposed private realm – land use and development standards would not explicitly involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings.

The Project proposes an intensification of land uses beyond the existing Specific Plan uses and boundary. It is possible that increased development activities could involve properties occupied by historical resources, as identified in the Specific Plan and in Section 2.a(1)(a) and **Table IV.C-1, Properties in Potentially Eligible Historic District**, above. Depending on design characteristics and construction activities associated with these future development projects, effects that may cause a substantial adverse change in the significance of an historical resource may occur. In accordance with CEQA Guidelines Sections 15064.5(b), 15064.5(b)(1) and 15064.5(b)(2)(C), these projects may have a significant effect on the environment.

Further, in the event that the site(s) of future projects become listed in the El Segundo Register of Cultural Resources in accordance with ESMC Section 15-14-3, these locations would be correspondingly designated as historic resources. Depending on design characteristics and construction activities associated with future development projects, effects that may cause a substantial adverse change in the significance of an historical resource may occur.

Chapter 7.E, of the Specific Plan (Administration, Design Review Process) requires review and approval of a Discretionary Downtown Design Review (DDR) for any of the following:

- New buildings;
- Building additions;
- Substantial exterior alterations, including installation, replacement, modifications to multiple types of architectural building features, including, without limitation, windows, doors, awnings, lighting, siding material and colors, landscaping, and signs as determined by the Director of Community Development, or his/her designee.
- Changes to the size or location of building openings, such as windows and doors.
- Outdoor retail uses and outdoor dining (including temporary dining).

Design review of projects meeting the above criteria would involve evaluation of consistency with district development standards. These standards and guidelines direct the height, form, placement, orientation, and articulation of new buildings to complement the existing scale and pattern of development. For projects on or adjacent to properties identified individually as potential historic resources or contributing to a potential historic district, DDR review shall consider the existing neighborhood character, building scale, building material, and potential impacts to historic resources.

In order to approve a project subject to Downtown Design Review, the approval authority must make the following findings:

- The project design is consistent with the goals, policies, and objectives of the General Plan and the Specific Plan.
- The project design substantially complies with the development standards and guidelines in Chapter 2 of the Specific Plan.

In order to find a project consistent with the goals, policies and objectives of the General Plan, the design review would consider the project's consistency with General Plan Objective LU1-4 (Preserve and maintain the City's Downtown and historic areas as integral to the City's appearance and function); Goal LU-2 (Preserve and enhance the City's cultural heritage and buildings or sites that are of cultural, historical, or architectural importance); Policy LU2-1.1 (New development adjacent to a building of cultural, historical, or architectural significance shall be designed with a consistent scale and similar use of materials); Objective LU2-2 (Encourage the preservation of historical and cultural sites and monuments); and Policy LU2-2.2 (Take an active role in assisting individual owners or groups in documenting and preserving building of potential cultural, historical, or architectural significance). The review would also consider Specific Plan Chapter 2.H, which establishes policies and guidance for preservation of historic resources within the Specific Plan area.

With implementation of the existing regulatory framework and the design review procedures set forth in the Specific Plan, any potential impacts to historic resources would be reduced to less than significant.

As applicable, the City will require additional documentation to record potential impacts resulting from development that would occur under the Specific Plan and implement **Mitigation Measure (MM) CUL-1,** which requires preparation of a project-specific technical report that would evaluate specific impacts and provide mitigation measures as necessary, for any proposed project within the Specific Plan area. Because **MM CUL-1** would apply to properties identified in the Historic Report (**Appendix D.1**) individually as potential historic resources or as contributing to a potential historic district, and which are subject to a Downtown Design Review for: a) substantial, permanent exterior alterations to a building, b) additions, or c) demolitions, impacts to historic resources from private realm development within the Specific Plan area would be less than significant.

(2) Public Realm – Multimodal Mobility

The proposed public realm - multimodal mobility enhancements would not explicitly involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings. Even within the 100 and 200 blocks of Richmond Street that were identified as a potential historic district in the reconnaissance survey, no existing elements of the streetscape were identified as character-defining features. The existing streetscape is mostly characterized by improvements that have been made by the City in the last two decades. Multimodal mobility improvement opportunities may include sidewalk, curb cut, driveway, alley, crosswalk, bike lane, and transit service enhancements. Improvements for vehicular circulation may include a reconfiguration of roadways to reduce travel lanes and increase sidewalk widths. Such improvements would not materially impair the continued eligibility of the identified historical resources because their significance is not defined by the streetscape.

Likewise, closing a section of Main Street or Richmond Street to vehicles on a temporary or permanent basis would not involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings. There is no reason to believe minor improvements required for street closures such as the installation of bollards would materially impair the ability of a historical resource to convey its significance.

Two existing surface parking lots have been identified as possible locations for new parking structures, one at the northeast corner of Richmond Street and Franklin Avenue and one at the northwest corner of Grand Avenue and Standard Street. The construction of a new parking structure at one of these locations would not involve the demolition, destruction, relocation, or alteration of any buildings, historic or otherwise. One of these locations, Richmond Street and Franklin Avenue, is in the immediate vicinity of the potential historic district on Richmond Street. The private realm development standards include design guidelines for parking structures that would reduce any impacts on the potential historic district to a less than significant level. The design guidelines would be enforced by the Specific Plan Downtown Design Review (DDR) process as outlined above and would address location, height, massing, articulation of facades, lighting, landscaping, and other considerations for creating visual interest and maintaining a pedestrian-oriented environment and General and Specific Plan policies related to historic preservation. New parking structures as identified in the Specific Plan would introduce new visual features to the setting of the potential historic district and would be subject to the DDR process.

In addition, Section 2.H.5 sets forth design standards for parking structures intended to ensure compatibility with surrounding areas. Therefore, this component of the Project would have a less than significant impact on historical resources. No mitigation measures are required.

(3) Public Realm – Placemaking and Beautification

The proposed public realm – placemaking and beautification improvements would not explicitly involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings. As previously stated, no existing elements of the streetscape were identified as character-defining features in the reconnaissance survey. Furthermore, the existing streetscape is mostly characterized by improvements that have been made by the City in the last two decades. Placemaking and beautification improvements may include amenities for pedestrians, bicyclists, public transit riders, and motorists alike. Adding gateways, signage, street furnishings, bike racks, bus shelters, and public art; and enhancing landscaping and lighting, etc. would not materially impair the continued eligibility of the identified historical resources because their significance is not defined by the streetscape. Furthermore, the proposed guidelines would be used for the implementation of public projects and development conditions for private projects. They are intended to reinforce the small-town feel, aesthetic quality, safety, and function of the Specific Plan area and would have a positive rather than a negative effect on the identified historical resources. Therefore, this component of the Project would have a less than significant impact on historical resources. No mitigation measures are required.

(4) Infrastructure and Public Facilities

The Project provides an overview of existing infrastructure and public facilities within the Project area. No specific improvements or changes are recommended for the implementation of the Specific Plan. The Project area includes the Civic Center; however, it was not identified as a potential historical resource. Thus, this component of the Project would not involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings and would not have a significant impact. No mitigation measures are required.

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

As previously discussed, a CHRIS records search at the SCCIC was completed on June 26, 2023. The records search identified 17 previously conducted cultural resources technical investigations within the 0.5-mile radius records search area. Of these, three studies overlap the Project area; however, individual sites were not identified within the current Project Site as a result of this study. Additionally, the SCCIC records indicate that 14 previously recorded cultural resources exist within the surrounding 0.5-mile search radius. All of the resources identified are built environment resources. No previously recorded prehistoric or historic-era archaeological resources were identified within the Project Site or 0.5-mile records search radius. Additionally, the NAHC was contacted on September 22, 2023, to request a search of its SLF. The NAHC responded to the request in a letter dated November 14, 2023. The NAHC's letter states that sites are not known to be located within the Project area. Therefore, the results of the SLF check conducted through

the NAHC was negative.[33] The NAHC submitted a letter to the City in response to the NOP on January 18, 2023. In the letter, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project Site. Below is a list of tribal organizations that were contacted by the City.

- Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians, Kizh Nation
- Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Sandonne Goad, Chairperson, Gabrielino/Tongva Nation
- Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council
- Charles Alvarez, Gabrielino-Tongva Tribe

In compliance with Assembly Bill 52, the City of El Segundo has contacted all NAHC-listed traditionally geographically affiliated tribal representatives that have requested Project notification. Tribal Cultural Resources and associated consultation are discussed in detail in **Section IV.M, Tribal Cultural Resources**.

Based on the results provided above, the potential of encountering and impacting unknown archaeological resources during Project implementation is low given the level of disturbance from the mid-twentieth century; however, it is always possible that unanticipated discoveries could be encountered during ground-disturbing activities associated with future development in the Project area. If such unanticipated discoveries were encountered, impacts to encountered resources could be potentially significant. However, with implementation of **MM CUL-2**, which includes preparation and implementation of a Worker Environmental Awareness Program (WEAP), all construction personnel will be appropriately informed of required responses to unanticipated cultural resources, should these be encountered. Additionally, **MM CUL-3**, requires that all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find. Thus, potentially significant impacts to archaeological resources would be reduced to less-than-significant levels with mitigation incorporated.

Threshold (c): Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

No prehistoric or historic burials were identified within the Project Site as a result of the records searches. Additionally, the Project Site is located within an urbanized area that has been subject to disturbance in the past as a result of multiple construction projects and development. Moreover, the Project is not part of a dedicated cemetery and as such, the likelihood of disturbing human remains is low. In accordance with Section 7050.5 of the California Health and Safety Code, if

[33] *State of California, Native American Heritage Commission, Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes § 65352.3 and §65352.4, as well as Assembly Bill 52 (AB52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, El Segundo Downtown Specific Plan Project, Los Angeles County, November 14, 2023.*

human remains are found, the Los Angeles County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of a site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, they shall notify the NAHC in Sacramento within 24 hours. In accordance with California PRC Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descended from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to a site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. Therefore, compliance with applicable State regulations related to the potential disturbance of human remains would be adequate to address any potential impacts. The Project would have a less than significant impact and no mitigation is required.

5. Cumulative Impact Analysis

Cumulative impacts on cultural resources consider whether impacts of the Project together with other related projects identified within the vicinity of the Project Site, when taken as a whole, substantially diminish the number of historic or archeological resources within the same or similar context or property type. However, impacts to cultural resources, if any exist, tend to be site-specific.

As discussed above, none of the components of the Project would explicitly involve the demolition, destruction, relocation, or alteration of the identified historical resources or their immediate surroundings. The Project includes a Downtown Design Review process for projects located within the Specific Plan area that would assure that project-level impacts to historic resources would be less than significant. As a result, the Project would not significantly contribute to potential cumulative impacts on historic resources and no mitigation would be required. Moreover, because of the location of potential historic resources within the Specific Plan area and the location of Related Projects relative to the Specific Plan boundary, the Related Projects would not significantly contribute to a potential cumulative impact with respect to historic resources and no mitigation is required.

For archaeological resources, cumulative projects may require extensive excavation in culturally sensitive areas, and thus, may result in adverse effects to known or previously unknown, inadvertently discovered archaeological resources. There is the potential for accidental discovery of other archaeological resources by future development in the Project area as well as by cumulative projects. Because all significant cultural resources are unique and non-renewable, all adverse effects or negative impacts contribute to a dwindling resource base. Through implementation of **MM CUL-3**, which would require investigation and handling by a qualified archaeologist in the event that an unknown resource is encountered, the project-level impact to archeological resources would be reduced to less than significant.

Other individual projects occurring in the vicinity of the Project area would also be subject to the same requirements of CEQA as the Project and any impacts to archaeological resources would

be mitigated, as applicable. These determinations would be made on a case-by-case basis, and the effects of cumulative development on historical and archaeological resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Therefore, with the implementation of **MM CUL-3**, cumulative impacts on archaeological resources would be reduced to a level of less than significant.

The Project was determined to have a less than significant impact on human remains. Existing regulations are adequate to address the potential for impacts due to the inadvertent discovery of human remains on the Project area. Other individual projects occurring in the vicinity of the Project area would also be subject to the same State requirements to contact appropriate agencies and coordinate with the County Coroner. As a result, the Project would result in a less than significant cumulative impact related to human remains and no mitigation would be required.

6. Mitigation Measures

MM CUL-1 For properties identified in the Historic Report (**Appendix D.1**) individually as potential historic resources or as contributing to a potential historic district and which are subject to a Downtown Design Review for: a) substantial, permanent exterior alterations to a building, b) additions, or c) demolitions, the applicant shall be required to prepare a Historical Resources Assessment Report (HRAR). The HRAR shall be prepared by a qualified professional who meets the Secretary of the Interior's Professional Qualifications Standards in architectural history or history. The qualified professional shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation. The qualified professional shall review the project for compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). The findings of the qualified professional shall be documented in a Memorandum at the schematic design phase. If the project does not comply with the Standards, the Memorandum shall include recommendations for changing the plans to bring the project into compliance. The purpose of the Memorandum is to ensure that the project complies with the Standards in order to avoid significant adverse impacts to historical resources, such that no further environmental review is required. The Memorandum shall be submitted to the City for review and concurrence with the findings and recommendations. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The HRAR shall be submitted to the City for review and concurrence with the findings.

MM CUL-2 Prior to commencement of construction activities for all phases of future development implementation, the project applicants shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City of El Segundo for review and approval. All construction personnel and monitors shall be present at the WEAP training prior to the start of construction activities. The WEAP shall be

prepared to inform all personnel working on a project about the archaeological sensitivity of the area, to provide specific details on the kinds of archaeological materials that may be identified during construction, to explain the importance of and legal basis for the protection of significant archaeological resources, and to outline the actions to be taken in the event of a discovery of cultural resources. The WEAP shall define "tribal cultural resources" and include appropriate management requirements relating to inadvertent discovery of a potential tribal cultural resource. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.

MM CUL-3 If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities for a project, the City shall be notified and all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find and determine whether or not additional study is warranted. The archaeologist shall be empowered to temporarily stop or redirect grading activities to allow removal of abundant or large artifacts. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted. The archaeologist shall also be required to curate any discovered specimens in a repository with permanent retrievable storage and submit a written report to the City of El Segundo for review and approval prior to occupancy. Once approved, the final report shall be filed with the South Central Coastal Information Center (SCCIC).

7. Level of Significance After Mitigation

With the implementation of **MM CUL-1,** potential impacts to historic resources associated with future development projects within the Specific Plan area would be less than significant. With the implementation of **MM CUL-2** and **MM CUL-3**, potential impacts to archaeological and paleontological resources would be less than significant. No mitigation is required for potential impacts to human remains.

8. References

Anne E. Grimmer, The Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Washington, D.C.: U.S. Department of Interior, National Park Services, Technical Preservation Services, 2017), page 2.

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National Register Bulletin #16: How to Complete the National Register Registration Form (Washington D.C.: U.S. Department of the Interior, 1997), page 16.

National Register Bulletin #16: How to Complete the National Register Registration Form (Washington D.C.: U.S. Department of the Interior, 1997), page 41.

National Register Bulletin #21: Defining Boundaries for National Register Properties (Washington D.C.: U.S. Department of the Interior, 1995), page 12.

Ordinance No. 1193 and Chapter 20.52 of the Municipal Code.

Public Resources Code § 5024.1 (a).

Public Resources Code § 5024.1 (d).

Public Resources Code § 5024.1 (c).

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Title 14 California Code of Regulations § 4852 (c).

Title 14 California Code of Regulations § 4850 & § 15064.5 (a) (2).

Title 14 California Code of Regulations § 15064.5 (a) (1).

Title 14 California Code of Regulations § 15064.5 (a) (2).

Title 14 California Code of Regulations § 15064.5 (a) (3) (4).

Title 14 California Code of Regulations § 15126.4 (b).

Title 14 California Code of Regulations § 15331.

Title 36 Code of Federal Regulations Part 60.2.

Title 36 Code of Federal Regulations Part 60.3 (d).

United States Department of the Interior, National Park Service, Native American Graves Protection And Repatriation Act, website: https://www.nps.gov/subjects/archeology/napgra.htm. Accessed March 2023.

United States Department of the Interior, National Park Service, Technical Brief # 20: Archeological Damage Assessment: Legal Basis and Methods, 2007, website: https://www.nps.gov/subjects/archeology/upload/tchBrf20_508.pdf. Accessed March 2023.

IV. Environmental Impact Analysis

D. Energy

1. Introduction

This section analyzes impacts on energy resources due to construction and operation of the El Segundo Downtown Specific Plan Update (Project) site and vicinity. Section 15126.2 (b) of the California Environmental Quality Act (CEQA) Guidelines states that a project's energy use shall be analyzed to determine the potential energy impacts of projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy, as well as being compliant with building codes and renewable energy features. Appendix G of the *State CEQA Guidelines* checklist, Section VI, *Energy*, includes questions to assist lead agencies when assessing a project's potential energy impacts. Additionally, *State CEQA Guidelines* Appendix F provides guidance on information to use when evaluating a project's energy use.

In accordance with applicable Appendix G sections and utilizing guidance from Appendix F of the *State CEQA Guidelines*, this Draft EIR includes relevant information and analyses that address the energy implications of the Specific Plan Update, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). Detailed energy calculations can be found in **Appendix E, Energy Calculations**, to this Draft EIR. Information found herein, as well as other aspects of the Project's energy implications, are further discussed elsewhere in this Draft EIR, including in **Section III, Project Description**, and **Section IV.F, Greenhouse Gas Emissions**. An analysis of the Project's potential impacts related to the construction and/or relocation of new or expanded energy infrastructure (i.e. electrical and natural gas supply lines) is included in **Section IV.N.4, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure**, of this Draft EIR. Other sources consulted are listed in **Section IV.D.8, References**, below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

In 2021, California generated the equivalent of 2,152 trillion British thermal units (Btu) of energy with fossil fuel sources (i.e., natural gas and crude oil) representing 43.1 percent of the total energy generated, renewable sources (i.e., biofuels, wood and waste, geothermal, hydroelectric,

solar, and wind) representing 48.9 percent, and nuclear electric power representing 8.0 percent.[1] During the same year, California consumed the equivalent of 7,359 trillion Btu with 20.0 percent (1,473 trillion Btu) of this demand generated by the residential sector, 19.0 percent (1,397 trillion Btu) from the commercial sector, 23.2 percent (1,704 trillion Btu) from the industrial sector, and 37.8 percent (2,785 trillion Btu) from the transportation sector.[2] This energy consumption translates to approximately 189 million Btu per capita.[3] Specific sources of energy generated and consumed and the sectors that consume them are further detailed below.

a) Electricity

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, either non-renewable (e.g., oil, gas, coal, and nuclear resources) or non-renewable (e.g., water, wind, solar, and geothermal resources) into energy. The delivery of electricity involves a number of system components including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Electrical power is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh, or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million W, while energy usage is measured in megawatt-hours (MWh), or gigawatt-hours (GWh), which is one billion Wh.

In 2022, California was the nation's fourth-largest electricity producer and approximately 80 percent of electricity sold in California was generated in-state.[4] Renewable resources, including hydropower and small-scale (less than 1-MW) customer-sited solar photovoltaic systems, supplied about half of the total in-state electricity generation. Electricity usage in California varies substantially by the types of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Of the approximate 247 million MWh of electricity sold to California land uses in 2021, the commercial sector utilized 44 percent (~109 million MWh), residential land uses utilized 37 percent (~90 million MWh), industrial land uses utilized 19 percent (~48 million MWh), and the transportation sector (railroads,

[1] *U.S. Energy Information Administration, State Energy Data Systems, Table P2: Primary Energy Production Estimates in Trillion Btu, 2021, data available for download at https://www.eia.gov/state/print.php?sid=CA#121. Accessed September 8, 2023.*

[2] *U.S. Energy Information Administration, State Profile and Energy Estimates, California, California Energy Production Estimates, 2021, website: https://www.eia.gov/state/?sid=CA#tabs-3. Accessed September 8, 2023.*

[3] *U.S. Energy Information Administration, California State Energy Profile, website: https://www.eia.gov/state/print.php?sid=CA. Accessed September 8, 2023.*

[4] *U.S. Energy Information Administration, Electric Power Monthly, Tables 1.3.B and 5.4.B, website: https://www.eia.gov/electricity/monthly/. Accessed September 7, 2023.*

subways, electric buses, cable cars) accounted for 0.25 percent (~0.6 million MWh).[5] Although California consumes more electricity than all other states except Texas, it uses less per capita than any other state except Hawaii.[6]

Southern California Edison (SCE) provides electricity to the City of El Segundo. SCE delivers electricity to approximately 15 million people in 180 cities in 15 counties through 12,635 miles of transmissions lines and 91,375 miles of distribution lines.[7] Electricity generated directly by SCE accounts for approximately 20 percent of the electricity it delivers to customers and is derived from the Palo Verde nuclear plant in Arizona, natural gas plants, hydroelectric plants, battery energy storage, solar rooftop installations, and a small diesel plant serving Catalina Island.

In 2021, SCE delivered approximately 57,096 GWh of electricity to end users; the commercial sector accounted for 52 percent of this demand (29,968 GWh), while the residential sector accounted for 40 percent (22,875 GWh) and the industrial sector accounted for 7 percent (4,253 GWh).[8] Of the total electricity delivered to SCE's customers in 2021, 31.4 percent was generated by eligible renewables (e.g., wind, solar, biomass/biowaste, small hydroelectric, and geothermal) and 11.5 percent was derived from other carbon-free sources (e.g., large hydroelectric and nuclear).[9] SCE also offers customers two "Green Rate" options to fund solar energy sources with either 50 percent or 100 percent of their electrical usage.

As detailed further in the regulatory discussion included in this section, the California Renewables Portfolio Standard (RPS) Program established a statewide goal to increase the amount of electricity generated from eligible renewable energy resources to 20 percent by 2010 and to 33 percent by 2020. Recent legislation revised the current RPS target for California to obtain 50 percent of total retail electricity sales from renewable sources by 2030, with interim targets of 40 percent by 2024, and 45 percent by 2027. Because SCE does not generate the majority of the electricity it delivers, its primary focus to meet RPS Program goals for renewables is on energy storage and grid modernization; these strategies allow for reduced reliance on natural-gas-fueled power plants during times of decreased availability of renewable-generated supplies. As of 2022, SCE had over 5,000 MW of energy storage installed or contracted, one of the largest portfolios in

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5 *U.S. Energy Information Administration, State Electricity Profiles, California, Table 8: Sales to Ultimate Customers, Revenue, and Average Price by Sector, derived from Form EIA-861, Annual Electric Power Industry Report, available for download at https://www.eia.gov/electricity/state/california/state_tables.php. Accessed September 7, 2023.*

6 *U.S. Energy Information Administration, State Energy Data System, Table C17: Electricity Sales to Ultimate Customers, Total and Residential, Total and per Capita, Ranked by State, 2021, website: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_sum/html/rank_es_capita.html&sid=US. Accessed September 7, 2023.*

7 *Southern California Edison, About Us: Who We Are, website: https://www.sce.com/about-us/who-we-are. Accessed September 7, 2023.*

8 *U.S. Energy Information Administration, State Electricity Profiles, California, Table 3: Top Five Retailers of Electricity, with End Use Sectors, 2021, California, derived from Form EIA-861, Annual Electric Power Industry Report, website; https://www.eia.gov/electricity/state/california/state_tables.php. Accessed September 7, 2023.*

9 *Southern California Edison, 2021 Power Content Label, website: https://www.sce.com/sites/default/files/custom-files/Web%20files/2021%20Power%20Content%20Label.pdf. Accessed September 7, 2023.*

the country. SCE also develops programs and incentives for accelerating electrification of buildings and the transportation sector.[10]

b) Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. The majority of the natural gas consumed in California is obtained from sources located outside the state, and delivered through high-pressure transmission pipelines. The natural gas delivery system is a nationwide network and, accordingly, resource availability is not typically an issue. Natural gas provides almost one-third of the state's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet (cf).

Most of California's natural gas reserves and production are located in the northern portion of the Central Valley and account for less than 10 percent of the state's total consumption. California is the second largest consumer of natural gas in the nation. Of the approximately 2.1 trillion cf of natural gas consumed in California in 2021, the largest percentages were utilized by the industrial sector, which consumed approximately 682 billion cf (33 percent), and for the generation of electric power, which consumed approximately 637 billion cf (30 percent). Approximately 240 billion cf (11 percent) was utilized by the commercial sector, 449 billion cf (21 percent) was utilized by the residential sector, and 25 billion cf (1 percent) was utilized as vehicle fuel, with approximately 59 billion cf (3 percent) allocated for lease/plant fuel and pipeline/distribution use.[11]

Natural gas is provided to the City by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California with a distribution network composed of approximately 51,070 miles of gas mains across an approximate 20,000-square-mile service territory. SoCalGas receives gas supplies from several sedimentary basins in the Western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), Rocky Mountains, Western Canada, and local California supplies. Total gas supplies available to SoCalGas customers is 3,435 million cf consisting of 210 million cf from California sources and 3,225 from out-of-state sources.[12] Underground storage plays a vital role in balancing natural gas supply and demand and systemwide reliability, and is used to: (1) meet peak daily and seasonal demand; (2) hedge against price volatility in commodity markets; and (3) address emergency situations, including extreme weather and wildfires. SoCalGas owns and operates four natural gas storage facilities with a combined theoretical inventory of over 130 billion cf.[13]

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[10] *Edison International, 2022 Sustainability Report, website: https://www.edison.com/sustainability/sustainability-report. Accessed September 7, 2023.*

[11] *U.S. Energy Information Administration, Natural Gas Consumption by End Use, California, Annual 2017-22, website: https://www.eia.gov/dnav/ng/ng_cons_sum_dcu_SCA_a.htm. Accessed September 7, 2023.*

[12] *California Gas and Electric Utilities, 2022 California Gas Report, page 185.*

[13] *California Gas and Electric Utilities, 2022 California Gas Report, page 144.*

Total gas delivered to SoCalGas' end users in 2021 was 2.44 billion cf; core residential land uses accounted for 25.4 percent (621 million cf) of this demand; core commercial land uses accounted for 8.6 percent (211 million cf); core industrial land uses accounted for 2.3 percent (55 million cf); and natural gas vehicles accounted for 1.6 percent (40 million cf). The remaining demand was associated with noncore end uses (e.g., large commercial and industrial land uses, electric generation, etc.), which accounted for 45.9 percent (1.12 billion cf) of gas delivered by SoCalGas in 2021.[14]

As a result of modest economic growth and the forecasted energy efficiency and fuel substitution created by revised Title 24 Codes and Standards and renewable energy goals that impact gas-fired electricity, SoCalGas projects total gas demand to decline at an annual rate of 1.5 percent from 2022 to 2035. Demand associated with all individual market sectors comprising total gas demand (e.g., residential, core commercial, core industrial, etc.) are expected to decline over this period with the exception of the natural gas vehicles market, which is expected to grow 2.1 percent over the forecast horizon as a result of federal, state, and local incentives and regulations encouraging the purchase and operation of alternative fuel vehicles and the increased use of renewable natural gas (i.e., biogas).[15]

c) Petroleum

California was the sixth largest crude oil producer in the nation in 2022, producing more than 122 million barrels of crude oil. California's drilling operations are primarily concentrated in Kern and Los Angeles Counties. A network of crude oil pipelines connects production areas to oil refineries in the Los Angeles area, the San Francisco Bay area, and the Central Valley. California oil refineries also process large volumes of Alaskan and foreign crude oil received in ports in Los Angeles, Long Beach, and the San Francisco Bay area. Crude oil production in California and Alaska is in decline, and California refineries have become increasingly dependent on foreign imports. Led by Saudi Arabia, Iraq and Ecuador, foreign suppliers now produce about 56 percent of the crude oil refined in California in 2021.[16]

California is the second largest consumer of refined petroleum products after Texas with approximately 84.5 percent of the petroleum consumed in the state consumed by the transportation sector.[17] In 2021, approximately 511 million barrels of petroleum were consumed by the transportation sector in California.

According to fuel sales data from the California Energy Commission (CEC), fuel consumption in Los Angeles County was approximately 3.1 billion gallons of gasoline and 464 million gallons of

[14] *California Gas and Electric Utilities, 2022 California Gas Report, Table 31: Annual Gas Supply and Sendout, Recorded Years 2017 to 2021, page 184.*

[15] *California Gas and Electric Utilities, 2022 California Gas Report, pages 115 to 132.*

[16] *U.S. Energy Information Administration, State Profile and Energy Estimates, California, Profile Analysis, website: https://www.eia.gov/state/analysis.php?sid=CA. Accessed September 8, 2023.*

[17] *U.S. Energy Information Administration, State Profile and Energy Estimates, Table F16: Total Petroleum Consumption Estimates, 2021, website: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA. Accessed September 8, 2023.*

diesel fuel in 2022.[18] During the same year, gasoline-fueled vehicles accounted for approximately 91.52 percent of the total annual vehicle miles traveled (VMT) in Los Angeles County and had an average fuel economy weighted for percentage of VMT of 11 miles per gallon (mpg), while diesel-fueled vehicles accounted for approximately 4.41 percent of the total annual VMT and had a weighted-average fuel economy of 25 mpg.[19] Electric, natural gas, and plug-in hybrid vehicles account for the remaining 4.07 percent of the total VMT.

California is now working on developing flexible strategies to reduce petroleum use. Over the last decade, the state has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. According to the California Department of Tax and Fee Administration, total statewide gasoline consumption has decreased by 7 percent from 2014 to 2022,[20] even as total population has increased. However, although the per capita gasoline consumption is showing a downward trend,[21] which supports this decrease, the CEC notes that increases in remote employment and unemployment following the Covid-19 pandemic have contributed to the decline.[22] The CEC also predicts that there will be an increase in use of alternative fuels, such as natural gas, biofuels, and electricity. Revisions to EPA fuel economy testing methods in 2006 as well as to manufacturing calculations in 2017 have resulted in improved fuel efficiency of gasoline- and diesel-powered vehicles, resulting in a reduction of fuel consumption.

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve,

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18 *California Energy Commission, Energy Assessment Division, 2022 California Annual Retail Fuel Outlet Report Results (CEC-A15) Results, August 16, 2023. Diesel is adjusted to account for retail (63.6%) and non-retail (36.4%) diesel sales.*

19 *Based on the California Air Resources Board on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2022). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT.*

20 *California Department of Tax and Fee Administration, Fuel Taxes Statistics & Reports, website: https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm. Accessed September 8, 2023.*

21 *Eno Center for Transportation, "How Have Different State Populations Changed Their Gasoline Consumption?" website: https://www.enotrans.org/article/how-have-different-state-populations-changed-their-gasoline-consumption/. Accessed September 8, 2023.*

22 *California Energy Commission, 2021 Integrated Energy Policy Report, Volume IV California Energy Demand Forecast, page 56.*

the Energy Conservation Program for Consumer Products, and Corporate Average Fuel Economy regulations.

(2) Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 promoted the development of intermodal transportation systems to maximize mobility and address national and local interests in air quality and energy. ISTEA contained factors for metropolitan planning organizations to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted policies defining the social, economic, energy, and environmental values guiding transportation decisions.

(3) Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century was signed into law in 1998 and builds on the initiatives established in the ISTEA legislation (previously discussed). The act authorizes highway, highway safety, transit, and other efficient surface transportation programs. The act continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of transportation decisions. The act also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of intelligent transportation systems to help improve operations and management of transportation systems and vehicle safety.

(4) Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[23]

(5) Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and the United States Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. In 2012, the NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[24] USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[25]

b) State

(1) Warren-Alquist Act

The California legislature passed the Warren-Alquist Act in 1974. The Warren-Alquist Act created the CEC. The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for buildings constructed and appliances sold in California.

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[23] *A "green job," as defined by the United States Department of Labor, is a job in a business that produces goods or provides services that benefit the environment or conserve natural resources.*

[24] *United States Environmental Protection Agency, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011.*

[25] *Federal Register/Vol. 81, No. 206/Tuesday, United States Environmental Protection Agency, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2018.*

- The act removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high-demand projections, and transferred it to a more impartial CEC.
- The CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

(2) State of California Energy Action Plan

The CEC and CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure that adequate, reliable, and reasonably priced electrical power and natural gas supplies are provided, and identified policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers. In 2005, a second Energy Action Plan was adopted by the CEC and CPUC to reflect various policy changes and actions of the prior 2 years.

At the beginning of 2008, the CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based, in part, on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, the CEC and CPUC prepared an update that examines the state's ongoing actions in the context of global climate change.

(3) Senate Bills 1078 (2002), 107 (2006), X1-2 (2011), 350 (2015) and 100 (2018)

Senate Bill (SB) 1078 established the California RPS Program and required that a retail seller of electricity purchase a specified minimum percentage of electricity generated by eligible renewable energy resources as defined in any given year, culminating in a 20% standard by December 31, 2017. These retail sellers include electrical corporations, community choice aggregators, and electric service providers. The bill relatedly required the CEC to certify eligible renewable energy resources, design and implement an accounting system to verify compliance with the RPS by retail sellers, and allocate and award supplemental energy payments to cover above-market costs of renewable energy.

SB 107 (2006) accelerated the RPS established by SB 1078 by requiring that 20% of electricity retail sales be served by renewable energy resources by 2010 (not 2017). Additionally, SB X1-2 (2011) requires all California utilities to generate 33% of their electricity from eligible renewable energy resources by 2020. Specifically, SB X1-2 sets a three-stage compliance period: by December 31, 2013, 20% had to come from renewables; by December 31, 2016, 25% had to come from renewables; and by December 31, 2020, 33% will come from renewables.

SB 350 (2015) expanded the RPS because it requires retail seller and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030, with interim goals of 40% by 2024 and 45% by 2027.

SB 100 (2018) accelerated and expanded the standards set forth in SB 350 by establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030 be secured from qualifying renewable energy sources. SB 100 also states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California by 2045. This bill requires that the achievement of 100% zero-carbon electricity resources does not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

Consequently, utility energy generation from non-renewable resources is expected to be reduced based on implementation of the RPS requirements described above. The proposed Project's reliance on non-renewable energy sources would be reduced accordingly.

(4) Assembly Bill 1007 (2005)

AB 1007 (2005) required the CEC to prepare a statewide plan to increase the use of alternative fuels in California (State Alternative Fuels Plan). The CEC prepared the plan in partnership with the California Air Resources Board (CARB) and in consultation with other state agencies, plus federal and local agencies. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

(5) Assembly Bill 32 (2006) and Senate Bill 32 (2016)

In 2006, the state legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted SB 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, CARB prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focused on increasing energy efficiencies, using renewable resources, and reducing the consumption of petroleum-based fuels (such as gasoline and diesel). As such, the state's GHG emissions reduction planning framework creates co-benefits for energy-related resources. Additional information on AB 32 and SB 32 is provided in Section 4.6, Greenhouse Gas Emissions, of this EIR.

(6) California Building Energy Standards

(a) Title 24 of the California Code of Regulations, Part 6

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title

24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023.[26] The 2022 Title 24 standards encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards. Buildings whose permit applications are applied for on or after January 1, 2023 must comply with the 2022 Title 24 standards.

(b) Title 24 of the California Code of Regulations, Part 11

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), are commonly referred to as the CALGreen Code and are a first-in-the-nation mandatory green building standards code.[27] The 2022 CALGreen Code includes regulations for energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Also included are mandatory provisions for commercial, residential, and public school buildings, and additional voluntary provisions these land uses as well as for hospitals. The 2022 CALGreen Code went into effect on January 1, 2023 and all buildings whose permit applications are applied for on or after January 1, 2023 must comply with the 2022 CALGreen Code.

(c) Title 20 of the California Code of Regulations

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. The CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwashers; clothes washers and dryers; cooking products; electric motors; low-voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

(d) Senate Bill 1

SB 1 (Murray) (August 2006) established a $3 billion rebate program to support the goal of the state to install rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the California Public Resources Code, including Chapter 8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for photovoltaic systems to meet minimum energy efficiency levels and performance requirements. Section 25780 established that it is a goal of the state to establish a self-sufficient

[26] *California Energy Commission, 2022 Building Energy Efficiency Standards, 2022.*
[27] *California Building Standards Commission, 2022 California Green Building Standards Code, 2022.*

solar industry. The goals included establishing solar energy systems as a viable mainstream option for both homes and businesses within 10 years of adoption, and placing solar energy systems on 50% of new homes within 13 years of adoption. SB 1, also termed "Go Solar California," was previously titled "Million Solar Roofs."

(e) Assembly Bill 1470 (Solar Water Heating)

This bill established the Solar Water Heating and Efficiency Act of 2007. The bill makes findings and declarations of the Legislature relating to the promotion of solar water heating systems and other technologies that reduce natural gas demand. The bill defines several terms for purposes of the act. The bill requires the commission to evaluate the data available from a specified pilot program, and, if it makes a specified determination, to design and implement a program of incentives for the installation of 200,000 solar water heating systems in homes and businesses throughout the state by 2017.

(7) Integrated Energy Policy Report

The CEC is responsible for preparing integrated energy policy reports that identify emerging trends related to energy supply, demand, and conservation; public health and safety; and maintenance of a healthy economy. The CEC's 2019 Integrated Energy Policy Report discusses the state's policy goals of decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast (CEC 2019d). SB 100 calls for California's electricity system to become 100% zero-carbon by 2045. CEC, CPUC, and CARB are working together to identify pathways to deeply decarbonize the state's electricity system in response to SB 100. The aim is to leverage California's clean electricity system to decarbonize, or remove carbon from, other portions of the state's energy system. Specifically, for the decarbonizing of building energy, the goal would be achieved by designing future commercial and residential buildings to have their energy sourced almost entirely from electricity in place of natural gas. Regarding the increase in renewable energy flexibility, the goal would be achieved through increases in energy storage capacity within the state, increases in energy efficiency, and adjusting energy use to the time of day when the most amount of renewable energy is being generated. Over time these policies and trends would serve to beneficially reduce the proposed Project's GHG emissions profile and energy consumption as they are implemented.

(8) California Assembly Bill 1493 (AB 1493, Pavley I)

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO_2) emissions, Assembly Bill (AB) 1493 (commonly referred to as CARB's Pavley regulations), enacted on July 22, 2002, requires CARB to set greenhouse gas (GHG) emission standards for new passenger vehicles, light duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards

for model years 2017-2025.[28,29] As discussed in subsection (1) *Federal*, above, in March 2020, the U.S. DOT and the U.S. EPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026. Refer to **Section IV.F. Greenhouse Gas Emissions**, of this Draft EIR for additional details regarding this regulation.

c) Regional and Local

(1) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SB 375 requires each MPO to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted on September 3, 2020, is the current RTP/SCS and is an update to the 2016-2040 RTP/SCS.

The 2020-2045 RTP/SCS focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land use strategies in development of the SCAG region through horizon year 2045. The 2020-2045 RTP/SCS projects that the SCAG region will meet the GHG per capita reduction targets established for the SCAG region of 8 percent by 2020 and 19 percent by 2035. Additionally, its implementation is projected to reduce VMT per capita for the year 2045 by 4.1 percent compared to baseline conditions for the year. Rooted in the 2008 and 2012 RTP/SCS plans, the 2020-2045 RTP/SCS includes “Core Vision” that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by location housing, jobs, and transit closer together, and increasing investments in transit and complete streets.

(2) City of El Segundo Climate Action Plan

In cooperation with the South Bay Cities Council of Governments, the City of El Segundo adopted their Climate Action Plan (CAP) in 2017. The purpose of the CAP is to assist the City in enhancing the community and neighborhoods to help ensure a safe, healthy, and sustainable environment, promote, and encourage the adoption and growth of zero emission vehicles, advance strategies for housing and buildings that reduce energy and water usage, promote behavior change that reduces waste, transform built environments into green spaces, and advance strategies to encourage and support the market for renewable energy and storage. The CAP includes a reduction target of a 15 percent decrease from 2005 levels by 2020 as recommended in the state

[28] *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493.*

[29] *United States Environmental Protection Agency, Regulatory Announcement: EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, 2012.*

AB 32 Scoping Plan and a 49 percent decrease from 2005 levels by 2035. The proposed Project is compared to the goals and measures of the CAP to determine consistency with the CAP.

(3) City of El Segundo General Plan

The City of El Segundo General Plan (City of El Segundo 1992) includes various policies related to improving air quality (both directly and indirectly). Applicable policies include the following:

Goal AQ3: Vehicle work trip reduction for private employees.

Objective AQ-3-1: Increase the proportion of work trips made by transit.

Policy AQ 8-1.1: It is the policy of the City of El Segundo that the City support legislation for the use and ownership of clean fuel vehicles.

Policy AQ 10-1.2: It is the policy of the City of El Segundo to adopt incentives, regulations, and/or procedures to prohibit the use of building materials and methods which generate excessive pollutants.

Policy AQ 10-1.3: It is the policy of the City of El Segundo that all new development projects meet or exceed requirements of the SCAQMD for reducing PM10 standards.

Goal AQ12: Reduction in Residential, Commercial, and Industrial Energy Consumption.

Objective AQ-12-1: Enact the recommendations of the AQMP Energy Working Group for commercial and residential buildings and adopt ordinances to mitigate air quality impacts from water and pool heating systems.

Policy AQ 12-1.1: It is the policy of the City of El Segundo that an ordinance be adopted requiring all new swimming pool water heater systems to utilize solar, electric, or low NO_x gas-fired water heaters, and/or pool covers.

Policy AQ 12-1.2: It is the policy of the City of El Segundo that the City encourage the incorporation of energy conservation features in the design of new projects and the installation of conservation devices in existing developments.

Policy AQ 12-1.3: It is the policy of the City of El Segundo to provide incentives and/or regulations to reduce emissions from residential and commercial water heating.

Policy AQ 12-1.4: It is the policy of the City of El Segundo that new construction not preclude the use of solar energy systems by uses and buildings on adjacent properties and consider enactment of a comprehensive solar access ordinance.

Policy AQ 13-1.1: It is the policy of the City of El Segundo that the City continue to implement the programs proposed in the City's Solid Waste Management Plan, concurrent with California Assembly Bill 939, to achieve a 25% reduction in residential solid waste requiring (disposal by 1995, and a 50% reduction by the year 2000).

(4) Proposed Specific Plan

The Specific Plan Update provides direction for development through regulatory tools and guidelines established to shape the design character envisioned by the community. Based on community input, planning principles shape the guidelines and standards contained in the Specific Plan Update. Planning principles that are implemented through land use and development standards for each district are set forth in the Specific Plan Update. There are no planning principles that are specifically related to energy; however, planning principles relevant to supporting multimodal mobility are designed to reduce VMT, which would, in turn, reduce the consumption of petroleum fuel. These planning principles are listed below:

Public Realm – Multimodal Mobility

- **Expanded Mobility** – Support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.
- **Pedestrians and Bicycles** – Improve walkability and the pedestrian environment and encourage bicycle use with additional bicycle improvements and amenities.

The Specific Plan Update's development standards include intentional site planning and design to ensure a pedestrian oriented traditional downtown environment. Specific site and building Development Standards for each District can be found in **Section III, Project Description**. In addition, the Multimodal Mobility chapter of the Specific Plan Update includes improvement opportunities related to the pedestrian network, bicycle circulation, public transit, and vehicular circulation. These improvement opportunities support the Specific Plan Update planning principles related to the improvement of walkability and the pedestrian environment, encouragement of bicycle use, support of enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit. A complete list of improvement opportunities related to the pedestrian network, bicycle circulation, and public transit can be found in **Section IV.L, Transportation**.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate the Project impacts to energy are based on Appendix G of the *State CEQA Guidelines*. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to energy would occur if the Project would:

Threshold (a): ***Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and***

Threshold (b): ***Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.***

b) Analysis of Project Impacts

Threshold (a): ***Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

Construction and operation of future development that would be accommodated by the Specific Plan Update would increase the demand for energy resources, including electricity, natural gas, and transportation-related petroleum fuel, beyond current demand associated with existing development. Although specific development projects have not been proposed as part of the Project, it is anticipated that the Specific Plan Update would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. An analysis of energy requirements associated with this potential development increases is presented below.

(1) Construction

Petroleum-based fuels, such as gasoline and diesel, would be the primary sources of energy for the Project's construction activities. This is because construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. In addition, most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would be turned off when not in use to avoid unnecessary consumption. Overall, electricity consumption during construction is temporary and is typically a fraction of the electrical demand during operation, which, as detailed below, would be well within the supply capabilities of the provider. Petroleum-based fuels would be required to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the Site.

As explained above in Subsection IV.D.4.a.1, Methodology, CalEEMod modeling prepared for the Project's Air Quality and Greenhouse Gas analyses conservatively assumed concurrent

construction of 10 percent of the future development that would be allowed under the Specific Plan. Because the evaluation of energy consumption is conducted on a total demand basis and not the worst-case annual basis that air emissions are evaluated on, the anticipated demand for petroleum associated with construction-related transportation under future development within the Specific Plan area was multiplied by 10 to provide a conservative estimate of the total demand required for construction of full buildout under the Project. Based on the CalEEMod modeling and emission factors for transportation fuels published by the U.S. Energy Information Administration, construction of all future development that would be accommodated under the Specific Plan update would require 296,700 gallons of diesel and 51,830 gallons of gasoline (detailed calculations and sources are provided in the Construction Transportation Energy Worksheet included in **Appendix E**).

Consumption of transportation fuel during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and contractors would be required to comply with the California Air Resource Board (CARB)'s In-Use Off-Road Diesel Fueled Fleets Regulation that restricts the idling of heavy-duty diesel motor vehicles and governs the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, per applicable regulatory requirements, future construction projects would be required to comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct development constructed pursuant to the Specific Plan Update. Furthermore, construction schedules and processes are already designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it.

Based on the above, construction activities associated with future development accommodated by the Specific Plan Update would not result in wasteful, inefficient, or unnecessary consumption of energy resources; impacts would be less than significant and no mitigation would be required.

(2) Operation

(a) Electricity

Operation of future development would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As detailed in the methodology discussion above, CalEEMod modeling prepared for the Specific Plan Update conservatively assumed full operation of all allowed development increases by 2024. According to the Project's CalEEMod modeling, operation of the allowable increases in development under the Specific Plan Update would have an electrical demand of 6,368,272 kWh, or 6.4 gigawatt-hours (GWh) per year. SCE projects that its total sales in 2024 (the assumed

operational year) will be 95,287 GWh.[30] As such, the Project's electrical demand would represent a negligible portion (0.007 percent) of the electrical consumption SCE anticipates and has planned supplies for within its service area.

Future development under the Specific Plan Update would be required to comply with all standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2022 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. Furthermore, development within the Specific Plan area would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with state requirements through Senate Bill 100 (SB 100), which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045.

(b) Natural Gas

Operation of future development would require natural gas for multiple purposes including refrigeration, certain appliances, and heating and cooling of air and water. According to the Project's CalEEMod modeling, operation of the allowable increases in development under the Specific Plan Update would have a natural gas demand of 27,782 cf per day.[31] SoCalGas projects that natural gas consumption within its service area will be approximately 2,327 million cf per day in 2024.[32] As such, the Project's electrical and natural gas demand would represent a negligible portion (0.001 percent) of the natural gas consumption SoCalGas anticipates and has planned supplies for within their service area.

As with the electrical demand, the natural gas demand of future development increases within the Specific Plan area would not be wasteful, inefficient, or unnecessary as a result of mandatory compliance with the stringent requirements of state and local building and energy code standards. Furthermore, the latest iteration of CALGreen (2022 CALGreen) includes requirements designed

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30 *California Energy Commission, California Energy Demand 2022-2035 Planning Forecast – LSE and BA Planning Forecast Tables, Form 1.1c: Electricity Deliveries to End Users by Agency (GWh), Corrected March 30, 2023, website: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2022-integrated-energy-policy-report-update-2. Accessed October 25, 2023.*

31 *Note that the CalEEMod outputs present operational natural gas demand as 9,787,964 kilo-British thermal units (kBTU) per year. According to the U.S. Energy Information Administration, in 2022, the average heat content delivered to U.S. consumers was about 1,036 Btu per cf. 9,787,964 kBTU per year x 1.0326 = 10,140,331 cf per year; 10,140,331 cf per year / 365 days per year = 27,782 cf per day.*

32 *California Gas and Electric Utilities, 2022 California Gas Report, page 185.*

to encourage the transition of new homes and buildings to electric-only forms of energy. As a result, it is likely that most, if not all, future development accommodated by the Specific Plan Update would be all-electric developments with no, or very little natural gas demand.

(c) Petroleum

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during operation of future development that would be accommodated under the Specific Plan Update as a result of water usage, solid waste disposal, and vehicle trips to and from the Project area by employees, residents, and visitors. According to the Project's CalEEMod modeling, operation of the full development increases that would be allowed under the Specific Plan Update would be associated with an annual VMT of 35,280,508. According to the CARB's On-Road Emissions Factor (EMFAC) model, in Los Angeles County, diesel-powered vehicles will account for 4.61 percent of all on-road VMT and will have an average fuel efficiency weighted for percentage of VMT of 12 mpg in 2024, while gasoline-powered vehicles will account for 89.95 percent of on-road VMT with a fuel efficiency of 26 mpg; electric-powered vehicles, natural-gas-powered vehicles, and plug-in hybrid vehicles will account for the remaining on-road VMT.[33] Using the same percentages of VMT and average fuel economy projected by EMFAC, operation of all land uses under full Project build-out would consume approximately 135,536 gallons of diesel fuel and 1,220,570 gallons of gasoline per year.[34] According to CARB's EMFAC model, on-road vehicles in Los Angeles County will consume approximately 529 million gallons of diesel and approximately 3.6 billion gallons of gasoline in 2024.[35] As such, fuel consumption by residents, employees, and visitors during operation of the Project would represent a negligible portion of fuel consumed in the County.

Over the lifetime of the Project, the fuel efficiency of vehicles is expected to increase as a result of numerous regulations in place that require and encourage increased fuel efficiency, such as efforts to accelerate the number of plug-in hybrids and zero-emissions vehicles in California, and increasingly stringent emissions standards. As a result, the amount of petroleum consumed as a result of vehicular trips to and from the Specific Plan area during operation would be expected to correspondingly decrease over time due to improvements in the fuel economies of the fleet of vehicles used to access the Project. Additionally, as detailed in **Section IV.L, Transportation**, implementation of the Specific Plan Update would not result in a significant transportation impact related to VMT and would not conflict with circulation system plans, including those pertaining to alternative modes of transportation. Furthermore, the Specific Plan Update includes improvement

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[33] *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2024). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project related VMT. See Operational Transportation Energy Worksheet in* ***Appendix E*** *of this document.*

[34] *Calculated as follows for diesel: 4.61 percent of total 35,280,508 VMT = 1,626,431 diesel VMT / 12 diesel mpg = 135,536 gallons of diesel. Calculated as follows for gasoline: 89.95 percent of total 35,280,508 VMT = 31,734,817 gasoline VMT / 26 gasoline mpg = 1,220,570 gallons of gasoline.*

[35] *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Ventura County; Fleet Aggregate; Annual; 2024). See Operational Transportation Energy Worksheet in* ***Appendix E*** *of this document.*

opportunities that support the Specific Plan Update planning principles related to the improvement of walkability and the pedestrian environment, encouragement of bicycle use, support of enhanced and efficient mobility opportunities for walking, bicycling, and transit. The increased density within the Project area that would be supported by the Project would co-locate residential land uses with population-serving commercial and employment land uses, resulting in a reduction in overall VMT as compared to business as usual development patterns. This is supported by the overall reduction in both total Citywide VMT and Project area VMT per service population that would result with implementation of the Specific Plan Update (see **Section IV.L, Transportation**).

(d) Summary

Based on the above, although implementation of the Specific Plan Update would increase energy consumption within the Project area, the anticipated energy demands of future development would be a small fraction of projected demands within the respective service areas and region. In addition, those demands are expected to diminish over time due to increases in efficiency requirements. Specifically, future development in the Specific Plan area would replace existing land uses. Not only would the replacement of existing uses partially offset the total energy demands presented above, but with respect to electrical and natural gas demand, would also result in buildings constructed under more recent building codes and standards that establish more stringent efficiency requirements for modern buildings. Furthermore, with respect to petroleum consumption, the Specific Plan Update would encourage development of mixed land uses that co-locate residents with population-serving commercial and employment land uses near existing and planned alternative modes of transportation and includes development standards and identifies improvement opportunities to encourage walking, biking, and transit use. Implementation of the Specific Plan Update would serve to reduce overall Citywide VMT and Project area VMT per service population. As such, the Specific Plan Update would not result in the wasteful, inefficient, or unnecessary consumption of energy during operation; impacts would be less than significant and no mitigation would be required.

Threshold (b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

State regulations for energy efficiency are contained within California's Building Energy Efficiency Standards and CALGreen, both of which are set forth in California Code of Regulations (CCR) Title 24. California's Building Energy Efficiency Standards were established in 1978 and serve to enhance and regulate California's building standards. These standards include regulations for residential and non-residential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated every three years to incorporate and consider new energy efficiency technologies and methodologies. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The latest 2022 standards became effective on January 1, 2023. All future development accommodated by the Specific Plan Update would be required to meet Building Energy Efficiency Standards and CALGreen standards to reduce energy demand and increase energy efficiency. Although the Project would result in greater net energy consumption than

existing conditions, the Project would allow for the redevelopment of older, less-efficient land uses with newer buildings subject to more stringent building efficiency codes and standards. Furthermore, future development within the Specific Plan Update area would receive electricity from SCE, which is mandated to comply with SB 100. This policy requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of the retail sales of electricity to California by 2045, and that the zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

The Specific Plan Update would be also subject to the policies set forth in SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG's 2020 Connect SoCal is the most recent update to their RTP/SCS at the regional level. Connect SoCal is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to Senate Bill (SB) 375. With regard to individual developments, such as the Project, the strategies and policies set forth in Connect SoCal include improved energy efficiency. Connect SoCal's goal is to actively encourage and create incentives for energy efficiency, where possible. The Project is a land use plan and would not include regulations related to fuel efficiency or alternative fuel vehicles; however, as previously discussed, implementation of the Specific Plan Update would result in decreases in overall Citywide VMT and Project area VMT per service population. The Specific Plan Update would increase access to transit and promote the use of active transportation modes by allowing increased density and promoting a mix of land uses in close proximity to transit.

Local plans for renewable energy and energy efficiency include the El Segundo Climate Action Plan (CAP), developed in December 2017. The CAP serves as a guide for action by setting GHG emission reduction goals and establishing strategies and policies to achieve these goals over a 20-year period. Selected strategies for energy efficiency emphasize efficiency retrofits for existing buildings, energy performance requirements for new construction, water efficient landscaping, and financing programs to assist home and business owners in implementing energy efficiency in their buildings. The CAP also identifies strategies for energy generation and storage that support the implementation of clean, renewable energy and decreasing dependence on traditional GHG-emitting energy resources. The Project is a land use plan and does not contain specific development plans or quantitative requirements for efficiency tiers or fuel economies, however, future development that would be supported by the Specific Plan Update would be required to be constructed according to the applicable energy efficiency requirements of Title 24 at the time their permit applications are filed. Although the majority of the CAP strategies are Citywide measures, not applicable at the plan or project level, implementation of the Specific Plan Update would not conflict with or obstruct their implementation.

Based on the above, the Project would allow for the development of buildings that would be subject to stringent requirements for energy efficiency and would increase density on infill sites in proximity to existing and planned pedestrian, bicycle, and transit facilities consistent with policies designed to reduce VMT. Therefore, implementation of the Specific Plan Update 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.

5. Cumulative Impact Analysis

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. As detailed in **Table II-1, List of Related Projects,** in **Section II, Environmental Setting**, of this EIR, there are 13 related projects in the City that would cumulatively increase the demand for energy resources, including electricity, natural gas, and petroleum through the development of residential, office, and various commercial land uses.

Buildout under the Project, related projects, and additional forecasted growth in SCE's service area and SoCalGas' service area would cumulatively increase the demand for electricity and natural gas supplies and infrastructure capacity. Regionally, energy supplies are typically expanded in response to increasing demand, and system expansion and improvements are ongoing. SCE and SoCalGas would continue to expand supply and delivery capacity as needed to meet demand increases within their respective service areas. Both SCE's and SoCalGas' long-range planning indicates that they will have adequate supplies to meet projected demands within their service areas through 2035.[36,37] Data used to develop SCE's and SoCalGas' demand forecasts account for population growth, energy efficiency improvements, and economic growth, which includes construction projects. Accordingly, the projected electrical demand of cumulative development within SCE's and SoCalGas' service areas, including within the City, has been considered and accounted for in long-range planning efforts. Therefore, additional sources of electrical or natural gas power beyond those already anticipated and planned for by SCE and SoCalGas would not be required as a result of cumulative development within the City.

Although future development would result in the use of renewable and non-renewable resources during construction and operation, which could limit future availability of non-renewable energy sources, the use of such resources would be on a relatively small scale given the sizes and types of uses proposed by the related projects, would be reduced by efficiency and reduction measures similar to those implemented for the Project, and would be consistent with growth expectations for the service areas. As with development under the Project, development of related projects would be expected to incorporate energy conservation features and comply with applicable regulations including CALGreen and state energy standards under Title 24. Additionally, as with the proposed Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions. Furthermore, as described above, the Project would be consistent with the energy efficiency policies emphasized by the 2020 RTP/SCS. Due to the City's urban and built-out conditions, related projects also represent infill redevelopment projects located near existing residential and commercial land uses and public transit options, which would serve to reduce vehicle trips and VMT, as well as the related consumption of transportation fuel.

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[36] *California Energy Commission, California Energy Demand 2022-2035 Planning Forecast – LSE and BA Planning Forecast Tables, Corrected March 30, 2023, Form 1.1c: Electricity Deliveries to End Users by Agency (GWh), website: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2022-integrated-energy-policy-report-update-2. Accessed October 25, 2023.*

[37] *California Gas and Electric Utilities, 2022 California Gas Report, page 185-188.*

Based on the above, the Project's contribution to cumulative impacts related to energy would not be cumulatively considerable and cumulative impacts to energy resources would be less than significant.

6. Mitigation Measures

Project-level and cumulative impacts with regard to energy would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative level impacts with regard to energy would be less than significant.

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https://www.eia.gov/state/print.php?sid=CA#121 under Supply & Distribution, Production / Total Energy, accessed September 8, 2023.

U.S. Energy Information Administration, State Profile and Energy Estimates, California, California Energy Production Estimates, 2021, website: https://www.eia.gov/state/?sid=CA#tabs-3. Accessed September 8, 2023.

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IV. Environmental Impact Analysis

E. Geology and Soils

1. Introduction

This section describes the existing geological conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. This section also evaluates the potential for the Project to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. This component of the analysis is, in part, based on the Natural History Museum of Los Angeles County (NHMLA), Paleontological Resources for an Unnamed Project in Downtown El Segundo, California[1], which is included as **Appendix D.2** of this Draft EIR. Other sources consulted are listed in **Section IV.E.8, References,** below, and include the California Geological Survey's (CGS) Earthquake Zones of Required Investigation and the El Segundo General Plan Public Safety Element.[2, 3]

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

This section describes the existing conditions in the Project area and also identifies the resources that could be affected by the Project.

a) Regional and Local Setting

The City of El Segundo (City) is located in a region of historic seismic activity. Active known faults in the vicinity include the San Andreas, Newport-Inglewood, San Fernando, Sierra Madre, and Verdugo. Certain areas of the City with high groundwater tables underlain by sand dune formation have a high potential for liquefaction. These areas parallel the coastline in the extreme western

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1 *NHMLA, Paleontological resources for an unnamed Project in Downtown El Segundo California, December 11, 2022, (**Appendix D.2** of this Draft EIR).*

2 *CGS. 2020. "Earthquake Zones of Required Investigation.", website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

3 *City of El Segundo. City of El Segundo General Plan, Chapter 10, Public Safety Element. Adopted 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed March 2023.*

portion of the City along Vista Del Mar and in the eastern portion of the City running generally from Aviation Boulevard northwest to Imperial Highway just west of Pacific Coast Highway.[4]

b) Topography

Topography within the El Segundo Downtown Specific Plan Update area is comprised of rolling topography.[5] Elevations range from approximately 100 to 150 feet above mean sea level.[6]

c) Seismicity and Faulting

The Project Site is located in a seismically active region. Several large and well-known faults are located in the Project region. **Figure IV.E-1, Quaternary Faults**, identifies the faults considered to most influence the seismic exposure of the City, including the Newport-Inglewood Fault, the Palos Verdes Fault, the Puente Hills Fault, and the Santa Monica Fault.[7] Other prominent faults in the region include the San Andreas, Newport-Inglewood, San Fernando, Sierra Madre, and Verdugo.[8] The California Geological Survey classifies faults as follows:[9]

- Holocene-active faults: faults that have moved during the past approximately 11,700 years (i.e., Holocene time). These faults exhibit signs of geologically recent movement, are most likely to experience movement in the near future, and are capable of surface rupture, and are considered "active faults."

- Pre-Holocene faults: faults that have not moved in the past 11,700 years but have moved in the past 2 million years (i.e., Quaternary time). These faults are considered "potentially active faults" and may be capable of surface rupture, but are less likely than Holocene-active faults to cause surface rupture. These faults are also capable of generating future earthquakes.

- Age-undetermined faults: faults where the recency of fault movement has not been determined. These faults are considered "inactive faults."

Holocene-active faults have been responsible for large historical earthquakes in southern California, including the 1971 San Fernando earthquake (moment magnitude [Mw] 6.7), the 1992 Landers earthquake (Mw 7.3), the 1952 Kern County earthquake (Mw 7.5), the 2019 Searles

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4 *City of El Segundo. City of El Segundo General Plan, Chapter 10, Public Safety Element. Adopted 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed March 2023.*

5 *City of El Segundo. City of El Segundo Downtown Specific Plan. Adopted August 1, 2000, website: https://www.elsegundo.org/home/showpublisheddocument/353/637110571779530000. Accessed March 2023.*

6 *USGS Survey, California, Los Angeles County, Venice Quadrangle, 7-5 minute Series, 2021. Accessed July 2023.*

7 *CGS. Fault Activity Map of California (2010).*

8 *CGS. Fault Activity Map of California (2010).*

9 *CGS. Earthquake Fault Zones, A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners For Assessing Fault Rupture Hazards in California. Revised 2018, website: https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP_042-a11y.pdf. Accessed March 2023.*

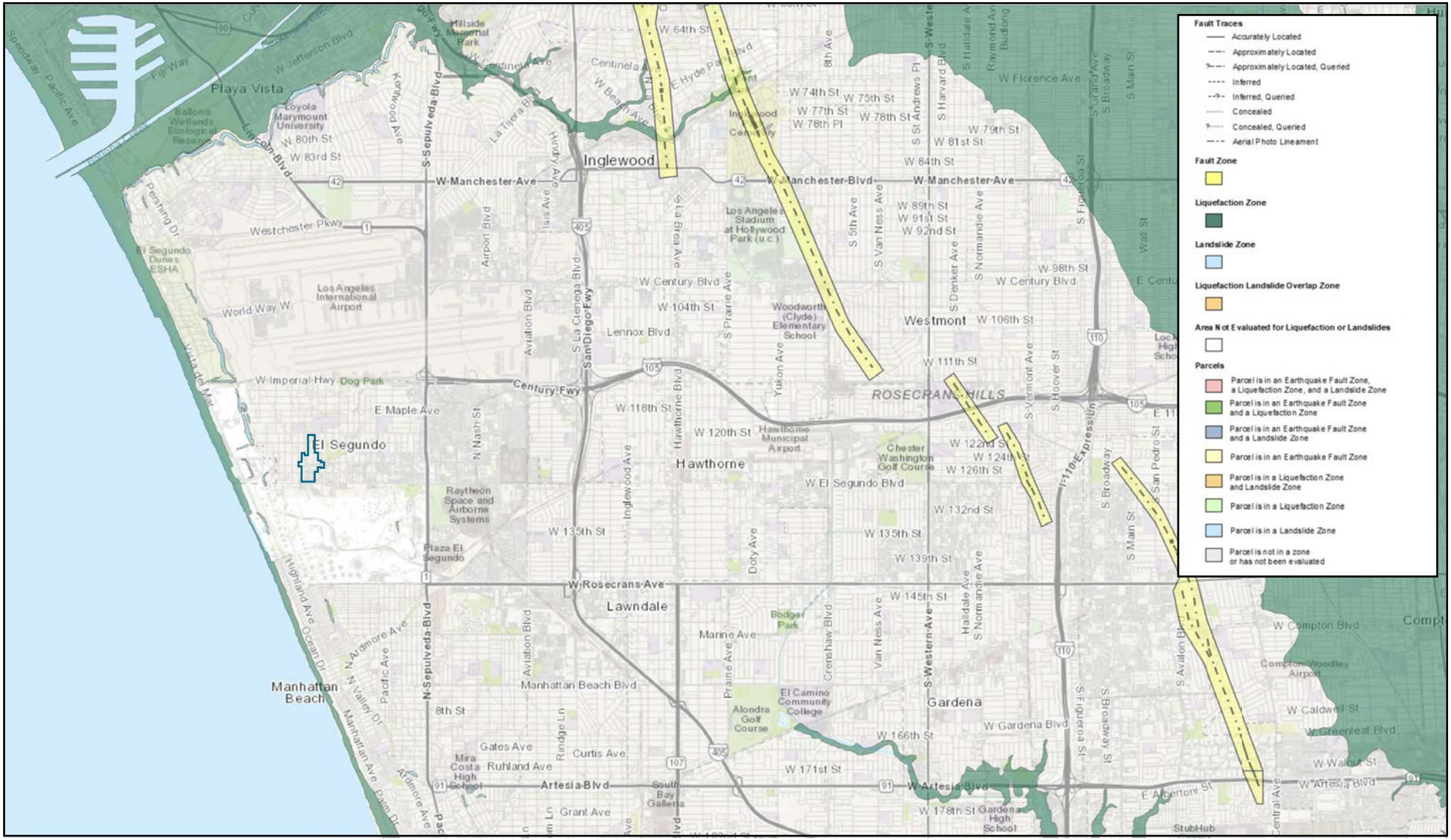

Figure IV.E-1
Quaternary Faults

Valley earthquake (Mw 7.1), and the 1933 Long Beach earthquake (Mw 6.4). Moment magnitude is the most commonly used method of describing the size of earthquakes. It measures the size of seismic events in terms of how much energy is released, and it relates to the amount of movement of rock. The southern California region also includes blind thrust faults, which are faults that do not rupture at the surface but are capable of generating substantial earthquakes. Examples of earthquakes caused by blind thrust faults include the 1987 Whittier Narrows earthquake (Mw 5.9) and the 1994 Northridge earthquake (Mw 6.7). Both of these earthquakes occurred on previously unidentified blind thrust faults.[10]

Most of the active faults in California are manifested as fault zones. Fault zones are defined as a region, varying in width from yards to miles that is bounded by major faults within which subordinate faults may be arranged variably or systematically. For example, the San Andreas Fault Zone is a region of crushed and broken rock, varying in width from a few hundred feet to a mile wide. Many smaller faults branch from and join the San Andreas Fault Zone.[11] Not all segments of an active fault zone are included in Alquist-Priolo Fault Zones (see the discussion under the "Surface Rupture" subheading below for more information on Alquist-Priolo Fault Zones). Rather, Alquist-Priolo Fault Zones consist of fault segments that are well defined and present sufficient evidence for geologists to conclude that the faults are active.

Major active faults in the Project region are listed in **Table IV.E-1, Summary of Nearby Faults**, and are described below. Distances from the center of the Specific Plan area (West Grand Avenue and Main Street) to individual faults represent the distance to the nearest fault segment within the respective fault zones.

Table IV.E-1
Summary of Nearby Faults

Regional Faulting	Approximate Closest Distance to Project Area (miles)	Fault Age	Probable Magnitude (Mw)
Newport-Inglewood Fault	4.6	Holocene-active	6.0–7.4
Palos Verdes Fault	3.6	Holocene-active to pre-Holocene	6.0–7.0
Santa Monica Fault	8.4	Holocene-active	6.0–7.0
Puente Hills Blind Thrust System	8.6	Holocene-active	6.5–7.1
Whittier Fault	17.7	Holocene-active	6.0–7.2
Raymond Fault	18.4	Holocene-active	6.0–7.0
Verdugo Fault	18.9	Holocene-active	6.0–6.8
San Fernando Fault	25.4	Holocene-active	6.0–6.8
Sierra Madre Fault	31.5	Holocene-active	6.0–7.0
San Andreas Fault	57.8	Holocene-active	6.8–8.0

Sources: CGS. Fault Activity Map of California (2010); CIT (California Institute of Technology). 2013. "Southern California Earthquake Data Center: Significant Earthquakes and Faults.", website: http://scedc.caltech.edu/significant/fault-index.html#a. Accessed March 2023.

[10] *CGS. Earthquake Fault Zones, A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners For Assessing Fault Rupture Hazards in California. Revised 2018, website: https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP_042-a11y.pdf. Accessed March 2023.*

[11] *USGS (U.S. Geological Survey). The San Andreas Fault. By S. S. Schulz and R.E. Wallace, 2016. Online edition, website: https://pubs.usgs.gov/gip/earthq3/safaultgip.html. Accessed March 2023.*

(1) Newport-Inglewood Fault

The Holocene-active Newport-Inglewood Fault extends from the southern edge of the Santa Monica Mountains southeastward to an area offshore of Newport Beach. This zone, commonly referred to as the Newport-Inglewood Uplift Zone, can be traced at the surface by following a line of geomorphically young anticlinal hills and mesas. These hills and mesas include the Baldwin Hills, Dominguez Hills, Signal Hill, Huntington Beach Mesa, and Newport Mesa. Earthquake focal mechanisms for 39 small earthquakes (1977 to 1985) show faulting along the north segment (north of Dominguez Hills) and along the south segment (south of Dominguez Hills to Newport Beach). The 1933 Long Beach earthquake has been attributed to movement on the Newport-Inglewood Fault Zone. Based on historic earthquakes, the fault zone is considered Holocene-active. Movement along the fault is northeast side up, resulting in vertical displacement of water-bearing sediments extending for several miles. The Newport-Inglewood Fault is capable producing of a maximum probable magnitude Mw 6.0 to 7.4 earthquake.[12] The closest segment of the Newport-Inglewood Fault Zone is located approximately 4.6 miles to the northeast of the Project area.[13,14]

(2) Palos Verde Fault

The Holocene-active to pre-Holocene Palos Verdes Fault is located approximately 3.6 miles to the northwest of the Project area and is traceable in the subsurface along the northern front of the Palos Verdes Hills. Offshore data, consisting of acoustic and reflection profiles, suggests very recent movement along the Palos Verdes Fault. This fault is capable of producing a maximum probable magnitude Mw 6.0 to 7.0 earthquake.[15,16]

(3) Puente Hill Thrust Fault

This fault is a blind thrust fault associated with the Lower Elysian Park Thrust Fault. The Santa Fe Springs section of the fault, located approximately 8.6 miles northeast of the Project area, is Holocene-active. The Puente Hills Fault, which extends from northern Orange County under downtown Los Angeles and into Hollywood, was most recently responsible for the 2014 magnitude Mw 5.1 earthquake, centered in La Habra, and indirectly (in conjunction with the Lower

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12 *CIT. 2013. "Southern California Earthquake Data Center: Significant Earthquakes and Faults.", website: http://scedc.caltech.edu/significant/fault-index.html#a. Accessed March 2023.*

13 *CGS. Fault Activity Map of California (2010).*

14 *CGS. Earthquake Fault Zones, A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners For Assessing Fault Rupture Hazards in California. Revised 2018, website: https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP_042-a11y.pdf. Accessed March 2023.*

15 *CGS. Fault Activity Map of California (2010).*

16 *CIT. 2013. "Southern California Earthquake Data Center: Significant Earthquakes and Faults.", website: http://scedc.caltech.edu/significant/fault-index.html#a. Accessed March 2023.*

Elysian Park Fault) the 1987 magnitude Mw 6.0 Whittier Narrows earthquake, centered in Whittier. This fault is capable of a maximum probable magnitude of Mw 6.5 to 7.1.[17,18]

(4) Santa Monica Fault

The Holocene-active Santa Monica Fault is an east/west-trending, left reverse fault that extends approximately 15 miles within the immediate vicinity of Pacific Palisades, Westwood, Beverly Hills, and Santa Monica. The Santa Monica Fault is approximately 8.4 miles to the northwest of the Project area and has the capability to generate a maximum probable Mw 6.0 to 7.0 earthquake.[19,20]

(5) San Andreas Fault

The Holocene-active San Andreas Fault is California's most prominent structural feature, trending in a generally northwest direction for almost the entire length of the state. The southern segment of the fault is approximately 280 miles long, extending from the Mexican border into the Transverse Ranges west of Tejon Pass. Along this segment, there is no single traceable fault line; rather, the fault is composed of several branches. The fault is located approximately 58 miles to the northeast of the Project area and is capable of producing an Mw 6.8 to 8.0 earthquake.[21,22]

d) Surface Rupture

Surface rupture involves the displacement and cracking of the ground surface along a fault trace. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two, typically confined to a narrow zone along the fault. Surface rupture is more likely to occur in conjunction with active fault segments where earthquakes are large, or where the location of the movement (earthquake hypocenter) is shallow. The Alquist-Priolo Earthquake Fault Zoning Act of 1972 regulates development near Holocene-active faults to address the hazard of surface fault rupture. This Act requires the State Geologist to establish regulatory zones (known as Alquist-Priolo Special Study Fault Zones) around the surface traces of Holocene-active faults and to issue appropriate maps.[23] The Project area is not located within an Alquist-Priolo Earthquake

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17 *Shaw, J.H., A. Plesch, J.F. Dolan, T.L. Pratt, and P. Fiore. 2002. "Puente Hills Blind-Thrust System, Los Angeles, California." Bulletin of the Seismological Society of America, 92(8): 2946–2960, website: http://activetectonics.asu.edu/bidart/bibliography/bssa/bssa_92_8/shaw_plesch_dolan_pratt_fiore_2002.pdf. Accessed March 2023.*

18 *USGS. 2017. "Quaternary Fault and Fold Database of the United States – Puente Hills Blind Thrust System, Los Angeles Section (Class A) No. 185a.", website: https://earthquake.usgs.gov/static/lfs/nshm/qfaults/Reports/185a.pdf. Accessed March 2023.*

19 *CGS. Fault Activity Map of California (2010).*

20 *CIT. 2013. "Southern California Earthquake Data Center: Significant Earthquakes and Faults.", website: http://scedc.caltech.edu/significant/fault-index.html#a. Accessed March 2023.*

21 *CGS. Fault Activity Map of California (2010).*

22 *CIT. 2013. "Southern California Earthquake Data Center: Significant Earthquakes and Faults.", website: http://scedc.caltech.edu/significant/fault-index.html#a. Accessed March 2023.*

23 *CGS. Earthquake Fault Zones, A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners For Assessing Fault Rupture Hazards in California. Revised 2018, website: https://www.conservation.ca.gov/cgs/documents/publications/special-*

Fault Zone.[24] As such, the potential for surface rupture due to fault displacement beneath the Project area is considered very low.

e) Ground Shaking

Ground shaking is the movement of the earth's surface as a result of an earthquake. Ground motion produced by seismic waves emanates from slow or sudden slip on a fault. The degree of ground shaking felt at a given site depends on the distance from the earthquake source, the magnitude of the earthquake, the type of subsurface material on which the site is situated, and topography. Generally, ground shaking is less severe on rock than on alluvium or fill, but other local phenomena may override this generalization. Ground shaking can produce significant ground horizontal and vertical movement that can result in severe damage to structures that are generally not equipped to withstand it. The Project area is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The Project area is situated in a seismically active area that has historically been affected by generally moderate to occasionally high levels of ground motion. The Project area lies in relatively close proximity to several seismically active faults; therefore, properties in the area will probably experience moderate to occasionally high ground shaking from nearby fault zones, as well as background shaking from other seismically active areas of the Southern California region.

f) Subsurface Soils

As the majority of the Project area has been previously developed, the underlying soils are likely to be comprised of sand with varying amount of silt and clay materials. Artificial fill will most likely be present within the area due to previous and recent developments. Existing artificial fill are anticipated to be unsuitable to support proposed site developments in their current condition. This condition can be mitigated by removing and recompacting these materials. Once these materials are removed, they are anticipated to be suitable for reuse as compacted fill. Subsurface soils are anticipated to be relatively easy to excavate with conventional heavy earthmoving equipment. Removal and recompaction of the site materials will result in some moderate shrinkage and subsidence. Design of site grading will require consideration of this loss when evaluating earthwork balance issues.

g) Groundwater

Regionally, the Specific Plan area is located in the West Coast Groundwater Basin, which is bounded on the north by the Santa Monica Mountains, on the east by the Newport-Inglewood Uplift, on the southwest by the Palos Verdes Hills, and on the west by the Pacific Ocean. The Newport-Inglewood fault zone acts as a partial barrier to the groundwater flow between the West

*publications*https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP_042-a11y.pdf*/SP_042-a11y.pdf. Accessed March 2023.*

[24] *CGS. 2020. "Earthquake Zones of Required Investigation.", website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

Coast Basin and the Central Basin to the east. Historical high groundwater is anticipated at a depth of at least 40 feet below the Specific Plan area.[25]

(1) Liquefaction/Lateral Spreading

Liquefaction is the phenomenon in which saturated, silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by earthquakes. The vast majority of liquefaction hazards are associated with sandy soils and silty soils of low plasticity. Potentially liquefiable soils must be saturated or nearly saturated to be susceptible to liquefaction. Liquefaction potential decreases with increasing grain size and clay and gravel content, but increases as the ground acceleration and duration of shaking increase. Structures founded on or above potentially liquefiable soils may experience bearing capacity failures due to the temporary loss of foundation support, vertical settlements (both total and differential), and undergo lateral spreading.

The City's General Plan Public Safety Element identifies liquefaction within the City as moderate risk.[26] Historical high groundwater is anticipated at a depth of at least 40 feet below the Specific Plan area.[27] Furthermore, according to the California Geological Survey, the Project area is not located within a potentially liquefiable area.[28] Therefore, the potential for liquefaction to occur beneath the site is considered to be very low.

(2) Slope Stability/Landslides

A landslide area, as identified by the State of California, is an area with the potential for earthquake-induced rock falls, slope failure, and debris flow. The factors contributing to landslide potential are steep slopes, unstable terrain, and proximity to earthquake faults. This process typically involves the surface soil and an upper portion of the underlying bedrock. Movement may be very rapid, or so slow that a change of position can be noted only over a period of weeks or years (creep). The size of a landslide can range from several square feet to several square miles. According to the California Geological Survey, the Project area is not located within a potential landslide area.[29]

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[25] *Seismic Hazard Zone Report for the Venice 7.5 Minute Quadrangle, Los Angeles County, California, 1998. Accessed August 2023.*

[26] *City of El Segundo. City of El Segundo General Plan, Chapter 10, Public Safety Element. Adopted 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed March 2023.*

[27] *Seismic Hazard Zone Report for the Venice 7.5 Minute Quadrangle, Los Angeles County, California, 1998. Accessed August 2023.*

[28] *California Department of Conservation, California Geological Survey, Earthquake Zones of Required Investigation, EQ Zapp Interactive Map, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

[29] *California Department of Conservation, California Geological Survey, Earthquake Zones of Required Investigation, EQ Zapp Interactive Map, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

(3) Subsidence

Subsidence is the permanent collapse of the pore space within a soil or rock and downward settling of the earth's surface relative to its surrounding area. Subsidence can result from the extraction of water or oil, liquefaction, or the addition of water to the land surface—a condition called "hydrocompaction." The compaction of subsurface sediment caused by the withdrawal or addition of fluids can cause subsidence. Land subsidence can disrupt surface drainage; reduce aquifer storage; cause earth fissures; damage buildings and structures; and damage wells, roads, and utility infrastructure. Volumetric changes in earth quantities will occur when excavated onsite soil materials are replaced as properly compacted fill.

(4) Collapsible and Expansive Soils

Expansive soils are clay-based soils that increase in volume when wet and shrink when dry. Expansive soils can undergo volume changes when they become wetted or dried. These changes can affect the overlying structures and other surface improvements.

There is a possibility that some soils in the Project area may exhibit collapsible potential upon wetting. If such materials are left unmitigated, this condition could result in excessive settlement of structures and site improvements due to the weight of new foundations and the introduction of water from rain or irrigation. Excessive settlement from such materials can be mitigated if they are removed and recompacted. Materials anticipated to exhibit this condition consist of the artificial fill soils.

h) Paleontological Resources

Paleontological resources, or fossils, are the remains of once living plants and/or animals and their traces (e.g., burrows and tracks) preserved in earth's crust, and are generally considered to be greater than 5,000 years old or prior to recorded human history per the Society of Vertebrate Paleontology guidelines.[30] With the exception of fossils found in low-grade metasedimentary rocks, significant paleontological resources are found in sedimentary rock units that are old enough to preserve the remains or traces of plants and animals. To determine paleontological sensitivity of individual rock units present within the Project area, a paleontological records search was requested from the Natural History Museum of Los Angeles County (LACM) on December 11, 2022. The search, the results of which are provided in **Appendix D.2** of this Draft EIR, included a review of paleontology collection records for previously recorded fossil localities.

The Project area lies within the southwestern block of the Los Angeles Basin.[31] The Los Angeles Basin (also called the coastal plain) extends from the Santa Monica Mountains in the north to the San Joaquin Hills of Orange County in the south and is a structural basin that in some areas has

[30] *SVP (Society of Vertebrate Paleontology). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, page 11, website: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf. Accessed March 2023.*

[31] *Yerkes, R.F., T.H. McCulloh, J.E. Schoellhamer, and J.G. Vedder, 1965. "Geology of the Los Angeles Basin California: An Introduction." Geological Survey Professional Paper 420-A. page 57.*

been subsiding and filling with sediments since the late Cretaceous.[32] The Los Angeles Basin is characterized by alluvial coastal plains, underlain by older alluvial and marine sediments, and punctuated by uplifted highlands owing to the numerous faults underlying the basin. These faults, which include the Newport-Inglewood fault zone (a strike-slip fault zone) in the south and the Sierra Madre fault zone in the north (a reverse fault), are part of the greater San Andreas fault system, characterized by numerous strike-slip faults.

There are no recorded fossil localities on the Project Site or in the Project area, however, fossil localities do occur nearby from the same sedimentary deposits that occur in the Project area, either at the surface or at depth.

The closest fossil locality known to the LACM is at the El Segundo Power Generation Station, on Franklin Avenue approximately 10 feet east of Standard Street, where Pismo clam (*Tivela stultorum*) and other invertebrates were recovered at 3 feet below the surface, and invertebrates (unspecified) were recovered 20 feet below the surface. The next closest fossil locality to LACM is at the Los Angeles International Airport, 4.3 miles north of the Project Site, where Elephant clade (*Proboscidea*) was recovered 25 feet below the surface. The next closest fossil locality to LACM is in Westchester at the intersection of West Century Boulevard and Bellanca Avenue, 4.5 miles northeast of the Project Site, where Mammoth (*Mammuthus*) was recovered 40 feet below the surface. The next closest fossil locality to LACM is at 8734 Bellanca Avenue in Westchester, 6.9 miles northeast of the Project Site, where Mammoth (*Mammuthus*) was recovered 14 feet below the surface. Lastly, a fossil locality to LACM is at the intersection of Airport Boulevard and Manchester Avenue, 4.5 miles northeast of the Project Site, where Mammoth (*Mammuthus*), bison (*Bison*), and hare (*Lepus*) was recovered 16 feet below the surface. Based on the review of scientific literature and geologic mapping, as well as the records search from the LACM, potentially fossil bearing units are present in the Project area, either at surface or in the subsurface.[33]

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act was enacted in 1977 to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." To accomplish this, the Earthquake Hazards Reduction Act established the National Earthquake Hazards Reduction Program (NEHRP). This program was substantially amended by the NEHRP Reauthorization Act of 2004 (Public Law 108-360).

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[32] *Yerkes, R.F., T.H. McCulloh, J.E. Schoellhamer, and J.G. Vedder, 1965. "Geology of the Los Angeles Basin California: An Introduction." Geological Survey Professional Paper 420-A. page 57.*

[33] *NHMLA, Paleontological resources for an unnamed Project in Downtown El Segundo California, December 11, 2022, (**Appendix D.2** of this Draft EIR).*

NEHRP's mission includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improvement of building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improvement of mitigation capacity; and accelerated application of research results. The NEHRP designates the Federal Emergency Management Agency (FEMA) as the lead agency of the program and assigns it several planning, coordinating, and reporting responsibilities. Programs under NEHRP help inform and guide local planning and building code requirements such as emergency evacuation responsibilities and seismic code standards such as those to which a project would be required to adhere.

(2) National Pollutant Discharge Elimination System (NPDES)

The NPDES Program has been responsible for substantial improvements to our nation's and state's water quality since 1972. The NPDES permit sets erosion control standards and requires implementation of nonpoint source control of surface drainage through the application of a number of Best Management Practices (BMPs). NPDES permits are required by Section 402 of the Clean Water Act.[34]

(3) Society for Vertebrate Paleontology Standard Guidelines

The Society for Vertebrate Paleontology (SVP) has established standard guidelines[35] that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. The Paleontological Resources Preservation Act (PRPA) of 2009 calls for uniform policies and standards that apply to fossils on all federal public lands. All federal land management agencies are required to develop regulations that satisfy the stipulations of the PRPA. As defined by the SVP,[36] significant nonrenewable paleontological resources are:

> *Fossils and fossiliferous deposits here are restricted to vertebrate fossils and their taphonomic and associated environmental indicators. This definition excludes invertebrate or paleobotanical fossils except when present within a given vertebrate assemblage. Certain invertebrate and plant fossils may be defined as significant by a project paleontologist, local paleontologist, specialists, or special interest groups, or by lead agencies or local governments.*

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[34] *Environmental Protection Agency, Clean Water Act Section 402 Website, website: https://www.epa.gov/cwa-404/clean-water-act-section-402-national-pollutant-discharge-elimination-system. Accessed March 2023.*

[35] *Society of Vertebrate Paleontology, Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010, website: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf. Accessed March 2023.*

[36] *Society of Vertebrate Paleontology, Assessment and mitigation of adverse impacts to nonrenewable palaeontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22-27, 1995.*

As defined by the SVP,[37] significant fossiliferous deposits are:

> *A rock unit or formation which contains significant nonrenewable palaeontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Palaeontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].*

Based on the significance definitions of the SVP,[38] all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

b) State

(1) State of California

(a) Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (formerly the Alquist-Priolo Special Studies Zone Act) was signed into law December 22, 1972 (revised in 1994) and codified into state law in the Public Resources Code (PRC) as Division 2, Chapter 7.5 to address hazards from earthquake fault zones. The purpose of this law is to mitigate the hazard of surface fault rupture by regulating development near active faults. As required by the Act, the state has delineated Earthquake Fault Zones (formerly Special Studies Zones) along known active faults in California, which vary in width around the fault trace from about 200 to 500 feet on either side of the fault trace. Cities and counties affected by the zones must regulate certain development projects within the zones. The State Geologist is also required to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. Local agencies enforce the Act in the development permit process, where applicable, and may be more restrictive than state law requires. According to Act, before a project that is within an Alquist-Priolo Earthquake Fault Zone can be permitted, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to

[37] *Society of Vertebrate Paleontology, Assessment and Mitigation of Adverse Impacts to Nonrenewable Palaeontologic Resources: Standard Guidelines, Society of Vertebrate Paleontology News Bulletin 163:22-27, 1995.*

[38] *Society of Vertebrate Paleontology, Assessment and Mitigation of Adverse Impacts to Nonrenewable Palaeontologic Resources: Standard Guidelines, Society of Vertebrate Paleontology News Bulletin 163:22-27, 1995.*

demonstrate that buildings will not be constructed across active faults. 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 a distance to be established by a California Certified Engineering Geologist. Although setback distances may vary, a minimum 50-foot setback is typically required.

(b) Seismic Hazards Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (PRC Sections 2690-2699.6). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of their project sites have been investigated and appropriate mitigation measures, if any, have been incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the safety element of their general plans and to encourage the adaptation of land use management policies and regulations to reduce and mitigate seismic hazards to protect public health and safety. Under PRC Section 2697, cities and counties must require, prior to the approval of a project located in a seismic hazard zone, submission of a geotechnical report defining and delineating any seismic hazard.

(c) California Building Code

The California Building Code (CBC), which is codified in Title 24 of the California Code of Regulations, Part 2, was promulgated to safeguard the public health, safety, and general welfare by establishing minimum standards related to structural strength, means of egress facilities, and general stability of buildings. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all buildings and structures within its jurisdiction. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or those standards are not enforceable. The provisions of the CBC apply to the construction, alteration, movement, replacement, location, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California.

The 2022 edition of the CBC is based on the 2021 International Building Code (IBC) published by the International Code Council. The code is updated triennially, and the 2022 edition of the CBC was published by the California Building Standards Commission on July 1, 2022, and became effective January 1, 2023. Every three years, the State adopts new codes (known collectively as the California Building Standards Code) to establish uniform standards for the construction and maintenance of buildings, electrical systems, plumbing systems, mechanical systems, and fire and life safety systems. Sections 17922, 17958 and 18941.5 of the California Health and Safety Code require that the latest edition of the California Building Standards Code apply to local

construction 180 days after publication. The significant changes to Title 24 in the 2022 edition can be found at California Department of General Services website.[39]

(i) Section J104.2.3, Engineered Grading Requirements

Section J104.2.3 of the CBC requires that an application for an engineered grading permit must be accompanied by plans and specifications, and supporting data consisting of a soils engineering report and engineering geology report. The plans and specifications must be prepared and signed by an individual licensed by the state to prepare such plans or specifications when required by the building official. Specifications must contain information covering structures and material requirements. Plans must be drawn to scale and be of sufficient clarity to indicate the nature and extent of the work proposed and show in detail that it will conform to the provisions of this code and all relevant laws, ordinances, rules, and regulations. Recommendations in the geotechnical engineering report and the engineering geology report must be incorporated into the grading plans or specifications. Additionally, a statement signed by the owner acknowledging that a field engineer, geotechnical engineer, and engineering geologist, when appropriate, will be employed to perform the services required by the CBC.

(ii) Section J113, NPDES Compliance

Section J113 of the CBC requires that all grading plans and permits must comply with the provisions of this section for NPDES compliance and that Best Management Practices (BMPs) must be installed before grading begins or as instructed in writing by the building official. As grading progresses, all BMPs must be updated as necessary to prevent erosion and control structures related pollutants from discharging from the site.

When requested by the building official, no grading permit shall be issued unless the plans for such work include a Stormwater Pollution Prevention Plans (SWPPP) with details of BMPs, including desilting basins or other temporary drainage or control measures, or both, as may be necessary to control structures-related pollutants which originate from the site as a result of structures related activities. In addition to the SWPPP, where a grading permit is issued and it appears that the grading will not be completed prior to November 1, the owner of the site must file a Wet-Weather Erosion-Control Plan, which includes specific BMPs to minimize the transport of sediment and protect public and private property from the effects of erosion, flooding or the deposition of mud, debris, or structures related pollutants.

[39] *California Building Standards Commission, California Building Codes Website, website: https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo/. Accessed March 2023.*

(d) California Penal Code Section 622.5

California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

(e) California PRC Section 5097.5

California PRC Section 5097.5 provides protection for paleontological resources on public lands, where Section 5097.5(a) states, in part, that:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological, or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands*.

c) Regional and Local

(1) City of El Segundo General Plan

The City of El Segundo General Plan includes various policies related to geology and safety (both directly and indirectly).[40] Applicable policies include the following:

Goal PS1: Protect the public health and safety and minimize the social and economic impacts associated with geologic hazards.

Policy PS1-1: Continue to review proposals for new development and for the expansion of existing development in areas of potential geological hazards.

Policy PS1-1.2: Enforce, monitor, and improve development standards which place the responsibility on the developer, with advice from qualified engineers and geologists, to develop and implement adequate mitigation measures as conditions for project approval.

Goal PS2: Minimize injury and loss of life~ property damage, and social~ cultural and economic: impacts caused by earthquake hazards.

Policy PS2-1.1: Continue to cooperate with and support federal, state, and county agencies in the development and enforcement of regional and local health and safety laws

[40] *City of El Segundo. City of El Segundo General Plan, Chapter 10, Public Safety Element. Adopted 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed March 2023.*

and environmental controls, e.g., implementation of SB 54 7 (Alquist).

Policy PS2-1.2: The City shall assist in the prevention of structural damage in areas 'With a high potential for liquefaction, landslides, and mudslides by requiring geotechnical studies for new development to mitigate potential impacts.

(2) City of El Segundo Municipal Code

The California Building Code, 2022 edition, published at CCR Title 24, Part 2, including Appendices F, H, and I, and is adopted by reference pursuant to Chapter 13-1-1 of the El Segundo Municipal Code (ESMC).

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate a project's impacts to geology and soils are based on Appendix G of the *State CEQA Guidelines*. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to geology and soils would occur if the Project would:

Threshold (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 based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42.***
- ***ii. Strong seismic ground shaking.***
- ***iii. Seismic-related ground failure, including liquefaction.***
- ***iv. Landslides***

Threshold (b): ***Result in substantial soil erosion or the loss of topsoil;***

Threshold (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;***

Threshold (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;***

Threshold (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; and***

Threshold (f): ***Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.***

b) Project Design Features

The Project would implement the following Project Design Features (PDFs) to minimize the potential for geology and soil related impacts during construction. The PDFs would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

PDF GEO-1: Site design-specific geotechnical and engineering reports are required to be prepared by a California-licensed geotechnical engineer, California-certified engineering geologist, and civil engineer with expertise in geotechnical issues registered in the State of California during Project design and prior to Project construction in compliance with the most current City of El Segundo Department of Public Works guidelines. The investigation is required to address the proposed Project foundation and structure design to minimize effects from adverse soil conditions including any liquefiable or otherwise unstable/consolidation-prone soils; bedrock characteristics; subsidence; earthquake ground shaking; slope instability; subsurface gas; groundwater; and/or other geotechnical and engineering geologic hazards. The design and construction recommendations will be incorporated into the foundation and structural design of proposed project components, implemented in accordance with the design, and subjected to on-going inspection by the relevant entities/agencies. Prior to Grading Plan approval and issuance of permits, all construction/development plans will be approved by the City for construction of such improvements. All site-specific construction will occur in accordance with the approved plans.

c) Analysis of Project Impacts

Threshold (a): ***Would the Project 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 based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42.***

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Project area is not located

within an Alquist-Priolo Earthquake Fault Zone.[41] As such, the potential for surface rupture due to fault displacement beneath the Project area is considered very low. The closest fault is the Palos Verdes Fault located approximately 3.6 miles to the northwest of the Project area and is traceable in the subsurface along the northern front of the Palos Verdes Hills. In addition, as shown in **Figure IV.E-1, Quaternary Faults**, no known faults traverse the Project Site.

The type of development that would occur under the Project is typical of urban environments and would not involve mining operations, deep excavation into the Earth, or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust that would result in the rupture of a fault.

Indirect impacts could occur through potential future development. Objectives of the Specific Plan Update would encourage and facilitate the redevelopment of underutilized sites within the Downtown area, including along primary transit corridors, but it does not propose specific development projects. The proposed Project would increase development potential, thereby potentially increasing the number of people and structures exposed to seismic ground shaking or seismic related ground failure; however, it would not cause or accelerate existing geologic hazards, and replacement of older structures with new structures that comply with current seismic standards would generally improve seismic safety. While the future development would not increase the risk of an earthquake, construction can have the effect of changing soil conditions. However, with compliance with existing regulatory standards, including Chapter 18 of the CBC and all other excavation and grading requirements in the CBC and ESMC, future development under the proposed Project would be required to prepare site specific geotechnical reports (see **PDF GEO-1**) and would not change the soil conditions that would increase the risk to structures or persons from future seismic related ground failure. Furthermore, the construction of new buildings and associated infrastructure on the Project Site would not directly or indirectly cause or exacerbate existing fault rupture risks. As a result, impacts related to surface rupture of a known earthquake fault would be less than significant and no mitigation would be required.

ii. Strong seismic ground shaking.

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Project Site is located in the seismically active region of Southern California. The closest fault is the Palos Verdes Fault located approximately 3.6 miles to the northwest of the Project area and is traceable in the subsurface along the northern front of the Palos Verdes Hills. This fault, as well as numerous other regional faults (e.g., Newport-Inglewood Fault, Puente Hills Thrust Fault, Santa Monica Fault, Verdugo Fault, Raymond Fault, Whittier Fault, Sierra Madre, San Fernando, and San Andreas Fault), are capable of producing moderate to large earthquakes that could affect the City, including the Project Site. The severity of ground shaking would depend on the magnitude of the earthquake, the distance to the Project Site, and on-site geologic conditions. Ground shaking

[41] *CGS. 2020. "Earthquake Zones of Required Investigation," website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

could lead to damage to structures and infrastructure, personal injury and death, utility service disruption, fire, explosion, and hazardous material spills.

As the majority of the Project area has been previously developed, the underlying soils are likely to be comprised of sand with varying amount of silt and clay materials. Artificial fill will most likely be present within the area due to previous and recent developments. Existing artificial fill are anticipated to be unsuitable to support proposed site developments in their current condition. This condition can be mitigated by removing and recompacting these materials. Once these materials are removed, they are anticipated to be suitable for reuse as compacted fill. Subsurface soils are anticipated to be relatively easy to excavate with conventional heavy earthmoving equipment. Removal and recompaction of the site materials could result in some moderate shrinkage and subsidence. Design of site grading would require consideration of this loss when evaluating earthwork balance issues.

Project construction would be completed in accordance with the 2022 CBC. As with all development within the City of El Segundo, development within the Project Site would be required to comply with the seismic safety requirements of the CBC. The CBC provides procedures for earthquake resistant structural design that includes considerations for onsite soil conditions, occupancy, and the configuration of the structure, including the structural system and height.

Although substantial damage to structures may be unavoidable during large earthquakes, the proposed structures would be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage, and loss of life.

As previously discussed, the 2022 edition of the CBC is based on the 2021 International Building Code, and all construction must be conducted in compliance with the CBC. Chapters 16 and 16A of the 2022 CBC include structural design requirements governing seismically resistant construction, including factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Therefore, upon Project compliance with the CBC and City policies aimed at minimizing geologic hazards, and the recommendations set forth in the site-specific geotechnical reports (see **PDF GEO-1**), the Project Site would not directly or indirectly cause substantial adverse effects involving strong seismic ground shaking, and impacts would be less than significant and no mitigation would be required.

iii. Seismic-related ground failure, including liquefaction.

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the depth to historic high groundwater in the Project vicinity is 40 feet below the ground surface; therefore, the potential for liquefaction to occur beneath the Project Site is considered to be very low. The Safety Element of the El Segundo General Plan states that some areas of the City are located on sand dune formations with high groundwater tables. As previously discussed, these soils are located 0.80

miles west of the Specific Plan area.[42] The City's General Plan Public Safety Element identifies liquefaction within the City as moderate risk.[43] Furthermore, according to the California Geological Survey, the Project area is not located within a potentially liquefiable area.[44] Therefore, the potential for liquefaction to occur beneath the site is considered to be very low. The potential for collapsible soils is discussed under Threshold c below.

As stated above, the type of development that would occur under the Project is typical of urban environments and would not involve mining operations, deep excavation into the Earth, or boring of large areas creating unstable seismic conditions. The proposed Project would increase development potential, thereby potentially increasing the number of people and structures exposed to seismic ground shaking or seismic related ground failure (including liquefaction); however, it would not cause or accelerate existing geologic hazards, including altering the underlying soil or groundwater characteristics that govern liquefaction and replacement of older structures with new structures that comply with current seismic standards would generally improve seismic safety. While the future development would not increase the risk of an earthquake, construction can have the effect of changing soil conditions that may increase the potential for liquefaction. However, with compliance with existing regulatory standards, including Chapter 18 of the CBC and all other excavation and grading requirements in the CBC and ESMC, future development under the proposed Project would not change the soil conditions that would increase the risk to structures or persons from future seismic related ground failure, including liquefaction. As such, seismic-related ground failure due to liquefaction would not be expected to occur on the Project Site, and impacts would be less than significant and no mitigation would be required.

iv. Landslides

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), a landslide area, as identified by the State of California, is an area with the potential for earthquake-induced rock falls, slope failure, and debris flow. According to the California Geological Survey, the Project area is not located within a potential landslide area.[45] Because the Project Site is not located within an area identified by the California Geological Survey as having potential for seismic slope instability, geologic hazards associated with landslides are not anticipated at the Project Site. Additionally, the Project would not exacerbate the potential for on- or off-site landslides. As such, implementation of the Project would not directly or indirectly cause potential substantial adverse

[42] *California Department of Conservation, Earthquake Zones of Required Investigation Map: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed August 2023.*

[43] *City of El Segundo. City of El Segundo General Plan, Chapter 10, Public Safety Element. Adopted 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed March 2023.*

[44] *California Department of Conservation, California Geological Survey, Earthquake Zones of Required Investigation, EQ Zapp Interactive Map, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

[45] *California Department of Conservation, California Geological Survey, Earthquake Zones of Required Investigation, EQ Zapp Interactive Map, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

effects, including the risk of loss, injury, or death involving landslides. No impacts would occur and no mitigation would be required.

Threshold (b): Would the Project result in substantial soil erosion or the loss of topsoil?

(1) Construction

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the project is a revision to the existing El Segundo Downtown Specific Plan. Soil erosion or loss of topsoil would generally not occur as the Specific Plan area is primarily built out. No changes to policies resulting in increased erosion would occur. Continued adherence to the standards of the existing CBC and compliance with the National Pollutant Discharge Elimination System (NPDES) permit and Storm Water Pollution Prevention Plan (SWPPP) requirements, as well as implementation of best management practices, would limit impacts related to soil erosion. Additionally, all future development would be required to implement Best Management Practices (BMPs) for construction activities as specified by the California Storm Water Best Management Practices Handbook and/or the City's Storm Water BMP Manual. The BMPs include measures guiding the management and operation of construction sites to control and minimize the volume of surface runoff. The ESMC requires that all grading plans and permits must comply with the provisions of this section for NPDES compliance and that BMPs must be installed before grading begins to prevent erosion and related pollutants from discharging from the site. No grading permit would be issued unless the plans for such work include a SWPPP with details of BMPs, including desilting basins or other temporary drainage or control measures, or both, as may be necessary to control structures-related pollutants which originate from the site as a result of structures related activities. In addition to the SWPPP, a Wet-Weather Erosion-Control Plan may be required (depending on the season of construction), which includes specific BMPs to minimize the transport of sediment and protect public and private property from the effects of erosion. The required SWPPP would establish erosion and sediment control BMPs for construction activities. Typical examples of erosion-related construction BMPs include the following:

- Silt fences and/or fiber rolls installed along with the limits of work and/or the Project construction site,
- Stockpile containment and exposed soil stabilization structures (e.g., Visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed),
- Runoff control devices (e.g., fiber rolls, gravel bag barriers/chevrons, etc.) used during construction phases conducted during the rainy season,
- Wind erosion (dust) controls, and
- Tracking controls at the site entrance, including regular street sweeping and tire washes for equipment, and Regular inspections and maintenance of BMPs.

These BMPs would be refined and/or added to as necessary by a qualified SWPPP professional to meet the performance standards in the Construction General Permit. Compliance with the Construction General Permit would ensure that soil erosion would be minimized.

The Project Site is currently developed and paved and does not contain available topsoil, with the exception of minimal landscaped areas adjacent to surface parking lots and buildings. The Project Site is not used, and is not zoned for, agricultural uses or other activities that require the use of topsoil. Therefore, potential impacts associated with soil erosion and/or loss of topsoil would be less than significant no mitigation would be required.

(2) Operation

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the structures and paving, while the remaining portions of the site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project. In addition, the majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. With the implementation of applicable construction BMPs, impacts related to erosion or loss of topsoil would be less than significant no mitigation would be required.

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

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Project is a revision to the existing El Segundo Downtown Specific Plan. New developments would be located on sites that have already been developed. It is unlikely that a new structure on a previously or currently occupied site designated for urban use would experience unstable conditions that were not previously encountered.

(1) Landslides

According to the California Geological Survey, the Project area is not located within a potential landslide area.[46] Because the Project Site is not located within an area identified by the California Geological Survey as having potential for seismic slope instability, geologic hazards associated with landslides are not anticipated at the Project Site. Additionally, the Project would not exacerbate the potential for on- or off-site landslides. As such, implementation of the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts would be less than significant and no mitigation would be required.

[46] *California Department of Conservation, California Geological Survey, Earthquake Zones of Required Investigation, EQ Zapp Interactive Map, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

(2) Liquefaction/Lateral Spreading

As previously discussed, the depth to historic high groundwater in the Project vicinity is 40 feet below the ground surface; therefore, the potential for liquefaction to occur beneath the Project Site is considered to be very low. The City's General Plan Public Safety Element identifies liquefaction within the City as moderate risk.[47] Furthermore, according to the California Geological Survey, the Project area is not located within a potentially liquefiable area.[48] Therefore, the potential for liquefaction to occur beneath the site is considered to be very low.

As stated above, the type of development that would occur under the Project is typical of urban environments and would not involve mining operations, deep excavation into the Earth, or boring of large areas creating unstable seismic conditions. The proposed Project would increase development potential, thereby potentially increasing the number of people and structures exposed to seismic ground shaking or seismic related ground failure (including liquefaction); however, it would not cause or accelerate existing geologic hazards, including altering the underlying soil or groundwater characteristics that govern liquefaction and replacement of older structures with new structures that comply with current seismic standards would generally improve seismic safety. While the future development would not increase the risk of an earthquake, construction can have the effect of changing soil conditions that may increase the potential for liquefaction. However, with compliance with existing regulatory standards, including Chapter 18 of the CBC and all other excavation and grading requirements in the CBC and ESMC, future development under the proposed Project would not change the soil conditions that would increase the risk to structures or persons from future seismic related ground failure, including liquefaction. As such, seismic-related ground failure due to liquefaction would not be expected to occur on the Project Site, and impacts would be less than significant and no mitigation would be required.

Lateral spreading is the finite, lateral movement of gently sloping, saturated soil deposits caused by earthquake-induced liquefaction. Impacts associated with lateral spreading would be similar to those associated with liquefaction and would therefore be less than significant and no mitigation would be required.

(3) Subsidence

As stated above, the majority of the Project area has been previously developed, the underlying soils are likely to be comprised of sand with varying amount of silt and clay materials. Artificial fill will most likely be present within the area due to previous and recent developments.

In accordance with the CBC Section 1804A, the compacted fill shall comply with the provisions of an approved geotechnical report, which is required by the CBC and the ESMC. The proposed Project would be required to meet the most recent building safety criteria and construction design

[47] *City of El Segundo. City of El Segundo General Plan, Chapter 10, Public Safety Element. Adopted 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed March 2023.*

[48] *California Department of Conservation, California Geological Survey, Earthquake Zones of Required Investigation, EQ Zapp Interactive Map, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 2023.*

recommendations of the site-specific final geotechnical reports that would be prepared for the construction of Project buildings, including removal of existing artificial fills. As such, impacts related to subsidence would be less than significant and no mitigation would be required.

(4) Collapsible Soils

There is a possibility that some soils in the Project area may exhibit collapsible potential upon wetting. If such materials are left unmitigated, this condition could result in excessive settlement of structures and site improvements due to the weight of new foundations and the introduction of water from rain or irrigation. Excessive settlement from such materials can be mitigated if they are removed and recompacted. Materials anticipated to exhibit this condition consist of the artificial fill soils.

As stated above, the majority of the Project area has been previously developed, the underlying soils are likely to be comprised of sand with varying amount of silt and clay materials. Artificial fill will most likely be present within the area due to previous and recent developments.

Design-level geotechnical investigations are required in accordance with existing regulations. The proposed Project must be designed and constructed in accordance with Section J104.2.3, Engineered Grading Requirements, of the CBC and the ESMC. All new building construction, alteration, or rehabilitation must comply with all applicable building and seismic codes of the City. In accordance with Section 1803A of the CBC, a geotechnical investigation is required that includes soil testing, laboratory testing or engineering calculations to evaluate soil types, soil expansion, depth of groundwater, deep foundations, rock strata, excavation, compacted fill, soil strength, seismic design criteria and other soil characteristics that need to be considered in the structural design and construction of buildings and infrastructure. Geotechnical investigations must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations from geotechnical investigations must be incorporated into the design and construction of the Project, as reviewed and approved by the City's Community Development Department. As such, impacts related to collapsible soils would be less than significant.

In summary, upon Project compliance with the CBC and City policies aimed at minimizing geologic hazards, and the recommendations set forth in the site-specific geotechnical reports, the Project Site would not directly or indirectly exacerbate existing conditions related to on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, and impacts would be less than significant and no mitigation would be required.

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

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Project is a revision to the existing El Segundo Downtown Specific Plan. New developments would be located on sites that have already been developed.

There is a possibility that some soils in the Project area may exhibit collapsible potential upon wetting. If such materials are left unmitigated, this condition could result in excessive settlement of structures and site improvements due to the weight of new foundations and the introduction of water from rain or irrigation. Excessive settlement from such materials can be mitigated if they are removed and recompacted. Materials anticipated to exhibit this condition consist of the artificial fill soils.

The majority of the Project area has been previously developed, the underlying soils are likely to be comprised of sand with varying amount of silt and clay materials. Artificial fill will most likely be present within the area due to previous and recent developments.

Given the expansion potential anticipated at the site, only nominal steps will be needed to mitigate adverse effects such as minor steel reinforcing of foundations and slabs, and moisture preparation and jointing details for flatwork. Typical mitigation measures described in Chapter 18 of the CBC to alleviate expansive soils include the following:

- Excavation of expansive soils until such a depth that competent material is encountered,
- Installation of foundations designed to resist forces exerted on the foundation due by expansive soils, and
- Stabilization of the soils by chemical, dewatering, pre-saturation, or equivalent techniques.

Such requirements would be set forth in the subsequent design-level geotechnical investigations prepared in accordance with Section J104.2.3, Engineered Grading Requirements of the CBC and the ESMC. With the implementation of Engineered Grading Requirements, potential impacts associated with expansive soils would be less than significant and no mitigation would be required.

Threshold (e): 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?

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Project Site is currently served by sewer infrastructure, and any new development would require sewer connections. The Project Site is located in an urbanized area that is currently connected to sewer lines. No septic tanks or alternative wastewater disposal is proposed; therefore, implementation of the Project would result in no impact and no mitigation would be required.

Threshold (f): Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

(1) Construction

As the majority of the Project area has been previously developed, the underlying soils are likely to be comprised of sand with varying amount of silt and clay materials. Artificial fill will most likely be present within the area due to previous and recent developments. Existing artificial fill are

anticipated to be unsuitable to support proposed site developments in their current condition. This condition can be mitigated by removing and recompacting these materials. Once these materials are removed, they are anticipated to be suitable for reuse as compacted fill. Subsurface soils are anticipated to be relatively easy to excavate with conventional heavy earthmoving equipment. Removal and recompaction of the site materials will result in some moderate shrinkage and subsidence. Design of site grading will require consideration of this loss when evaluating earthwork balance issues.

There are no recorded fossil localities on the Project Site or in the Project area, however, fossil localities do occur nearby from the same sedimentary deposits that occur in the Project area, either at the surface or at depth. Based on the review of scientific literature and geologic mapping, as well as the records search from the LACM, potentially fossil bearing units are present in the Project area, either at surface or in the subsurface.[49]

Any Quaternary Alluvial materials present within the Project Site are considered highly sensitive for supporting paleontological resources. In the event that intact paleontological resources are located on the Project Site, ground-disturbing activities associated with construction of the Project, such as grading during site preparation, excavations for the subterranean uses, and trenching for pipelines or utilities, have the potential to destroy unique paleontological resources and/or sites. However, with the implementation of **Mitigation Measure (MM) GEO-1**, which requires the applicant to retain a qualified paleontologist and a preparation of a Paleontological Resources Impact Mitigation Program (PRIMP) that requires preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the Project Site below a depth of 5 feet below the existing ground surface or depth of documented artificial fill (based on construction plans and/or geotechnical reports), procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. With incorporation of **MM GEO-1**, construction impacts to paleontological resources would be reduced to a level of less than significant.

With regard to a unique geologic feature, the Specific Plan area is currently developed with commercial, residential, and surface parking uses and there are no unique geologic features in the Specific Plan area. Therefore, the project would not directly or indirectly destroy a unique geologic feature. No impacts would occur to geologic structures and no mitigation would be required.

(2) Operation

Long-term operation of the Specific Plan area would be developed with commercial, residential, and surface parking uses while the remaining portions of the site would be covered with irrigated landscaping. Operation of the Project would not have the potential to destroy a unique

[49] *NHMLA, Paleontological resources for an unnamed Project in Downtown El Segundo California, December 11, 2022, (**Appendix D.2** of this Draft EIR).*

paleontological or geological resource. Operational impacts to paleontological and geological resources would be less than significant no mitigation would be required.

5. Cumulative Impact Analysis

Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards, including unstable geologic conditions, or contribute substantially to erosion. Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. However, the majority of impacts from geologic hazards, such as rupture of a fault line, liquefaction, landslides, expansive soils, and unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis. As detailed in **Table II-1, List of Related Projects,** in **Section II, Environmental Setting**, of this EIR, there are 13 related projects in the City that would result in increased development of residential, office, and various commercial land uses. Each related project would be required to adhere to required building engineering design per the most recent version of the CBC in order to ensure the safety of building occupants and avoid a cumulative geologic hazard. Additionally, as needed, projects would incorporate individual mitigation or geotechnical requirements for site-specific geologic hazards present on each individual related project site.

Similarly, **MM GEO-1** would ensure that potential impacts to paleontological resources would be less than significant and other related projects that would have a potential to impact soils that are sensitive for significant fossils would also require mitigation. Therefore, a potential cumulative impact related to site-specific geologic hazards, such as seismically induced ground failure, subsidence, soil collapse, and expansive soils, as well as paleontological resources, would not occur. Therefore, the proposed Project, in combination with other related projects, would not contribute to a significant cumulative impact associated with geology and soils.

6. Mitigation Measures

MM GEO-1: For excavations that are greater than 5 feet below the existing ground level or in the event that paleontological materials are found during any grading or excavation activity, a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards shall be retained by the Project applicant/developer prior to the approval of demolition or grading permits. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project for review and approval by the City. The PRIMP shall be consistent with the SVP (2010) guidelines and shall outline requirements for preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the Project Site below a depth of 5 feet below the existing ground surface or depth of documented artificial fill (based on construction plans and/or geotechnical reports), procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. At a minimum, the PRIMP shall require that a qualified paleontologist attend the preconstruction meeting and a qualified paleontological monitor be on-site during all rough grading

and other significant ground-disturbing activities (including augering) in previously undisturbed deposits. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the PRIMP shall require that a paleontological monitor temporarily halt and/or divert grading activity to allow recovery of paleontological resources.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to geology and soils would be less than significant. Project-level and cumulative construction impacts with regard to paleontological and geological resources would be significant. However, with the incorporation of **MM GEO-1** construction-related impacts to paleontological and geological resources would be reduced to a level of less than significant. Project-level and cumulative operational impacts with regard to paleontological and geological resources would be less than significant.

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IV. Environmental Impact Analysis

F. Greenhouse Gas Emissions

1. Introduction

This section describes the projected greenhouse gas (GHG) emissions conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. The analysis is primarily based on the *Greenhouse Gas Study for the El Segundo Downtown Specific Plan Update Project* (Greenhouse Gases Study) prepared by Noah Tanski Environmental Consulting (NTEC), dated September 13, 2023, included in **Appendix F** of this Draft EIR. Other sources consulted are listed in **Section IV.F.8, References**, below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. Greenhouse gas emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

b) Greenhouse Emissions Background

GHG emissions include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[1] Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

c) Existing Statewide Greenhouse Gas Emissions

California Air Resources Board (CARB) reports that in 2019, emissions from GHG emissions statewide were 404 Million Metric Tons of Carbon Dioxide Equivalent ($MMTCO_2e$), 27 $MMTCO_2e$ below the State's 2020 GHG limit of 431 $MMTCO_2e$. The transportation sector was the largest source of GHG emissions, accounting for approximately half of the State's GHG inventory when including upstream transportation emissions from the refinery and oil and gas industrial sectors. The commercial and residential sectors accounted for approximately 10 percent of GHG emissions. Agriculture accounted for approximately 8 percent, and electricity generation accounted for approximately 20 percent. Remaining emissions came from sectors such as non-transportation fuel-related industrial sources, recycling and waste management, and from high global warming potential gases.

In 2021, approximately 52 percent of electricity generation serving California came from renewable and zero-carbon resources (e.g., solar and wind).

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) Federal Clean Air Act

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHGs are pollutants under the federal Clean Air Act, which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, USEPA issued an endangerment finding for GHGs under the Clean Air Act, setting the stage for future regulation.

The Federal Government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency,

[1] *As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.*

renewable energy, CH_4 and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

(2) Corporate Average Fuel Economy (CAFE) Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The National Highway Traffic Safety Administration (NHTSA) subsequently issued multiple final rules regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011 and later for model years 2012-2016, and 2017-2021. In March 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe CO_2 emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.[2] These standards set a combined fleet wide average of 36.9 to 37 for the model years affected.[3]

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the EPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[4]

(3) Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

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2 *United States Environmental Protection Agency, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.*

3 *National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.*

4 *United States Environmental Protection Agency, Regulatory Announcement: EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.*

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[5]

(4) Federal Vehicle Standard

In response to the U.S. Supreme Court ruling discussed above, the Bush Administration issued Executive Order (EO) 13432 in 2007 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011; and, in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016 (75 FR 25324–25728).

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021 (77 FR 62624–

[5] *A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.*

63200). On January 12, 2017, EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks.[6]

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.[7]

In August 2018, EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards now in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2%–3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of one degree Celsius by 2100.[8] California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives. Thus, the timing and consequences of the 2018 federal proposal are speculative at this time.

On September 27, 2019, EPA and NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program" (84 FR 51,310), which became effective November 26, 2019. The Part One Rule revokes California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the EPA and NHTSA issued Part Two of the SAFE Rule, which went into effect 60 days after being published in the Federal Register. The Part Two Rule sets CO_2 emissions standards and corporate average fuel economy standards for passenger vehicles and light duty trucks for model years 2021 through 2026. This issue is evolving as California and 22 other states, as well as the District of Columbia and four cities, filed suit against the EPA and a petition for reconsideration of the rule on November 26, 2019. The litigation is not expected to be resolved for at least several months.

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6 *EPA. Carbon Pollution Standards for Cars and Light Trucks to Remain Unchanged Through 2025, website: https://19january2017snapshot.epa.gov/newsreleases/carbon-pollution-standards-cars-and-light-trucks-remain-unchanged-through-2025_.html. Accessed September 2023.*

7 *EPA and NHTSA (Department of Transportation's National Highway Traffic Safety Administration). "Regulations and Standards: Heavy-Duty. EPA and DOT Finalize Greenhouse Gas and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles." website: https://www3.epa.gov/otaq/climate/regs-heavy-duty.htm. Accessed September 2023.*

8 *EPA and NHTSA. The Safer Affordable Fuel-Efficient 'SAFE' Vehicles Rule for Model Years 2021–2026 Passenger Vehicles and Light Trucks. Proposed Rule August 2018, website: https://www.govinfo.gov/content/pkg/FR-2018-08-24/pdf/2018-16820.pdf. Accessed September 2023.*

b) State

The State legislature, executive office, and administrative agencies have promulgated various regulations, rules, policies, and strategies that govern GHG emissions. Below is a timeline thereof, followed by explanations of each:

- June 2005: Executive Order S-3-05 (EO S-3-05)
- September 2005: Assembly Bill 32 (AB 32) (codified EO S-3-05)
- August 2007: Senate Bill 97 (SB 97)
- September 2008: Senate Bill 375 (SB 375)
- December 2008: CARB adopts Climate Change Scoping Plan (the "AB 32 Scoping Plan" or 2008 Scoping Plan)
- August 2011: CARB adopts Supplemental Functional Equivalent Document to the Climate Change Scoping Plan (the "Supplemental FED")
- May 2014: CARB adopts First Update to the Climate Change Scoping Plan: Building on the Framework (the "First Update" or 2013 Scoping Plan Update)
- April 2015: Executive Order B-30-15 (EO B-30-15)
- September 2016: Senate Bill 32 (SB 32) (codified EO B-30-15)
- November 2017: CARB adopts the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (the "2017 Scoping Plan Update")
- September 2018: Executive Order B-55-18 (EO B-55-18)
- September 2022: Assembly Bill 1297 (AB 1297) (codified EO B-55-18)
- November 2022: CARB adopts the 2022 Scoping Plan for Achieving Carbon Neutrality (the "2022 Scoping Plan Update")

Other regulations would also have an indirect effect on GHG emissions. The following regulations would not be determinative of their CEQA significance, but explanations of these regulations are nonetheless provided below for informational purposes:

- SB 350, the Clean Energy and Efficiency Act of 2015
- Cap-and-Trade Program

(1) Executive Order S-3-05

In June 2005, Governor Arnold Schwarzenegger signed EO-S-3-05, which had the goal of reducing the State's GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

(2) Assembly Bill 32

In September 2005, Governor Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.[9]
- By 2020, reduce statewide GHG emissions to 1990 levels.

AB 32 required the California Air Resources Board (CARB) to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. The State achieved its 2020 GHG emissions target of returning to 1990 levels four years earlier than mandated by AB 32.

(3) Senate Bill 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (the "Guidelines Amendments") were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

The Guidelines Amendments do not provide thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

(1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

[9] *The 2010 target to reduce GHG emissions to 2000 levels was not met.*

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies "that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for the cumulative impact analysis."[10]

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

(4) Senate Bill 375

In September 2008, Governor Schwarzenegger signed SB 375, the Sustainable Communities and Climate Protection Act of 2008, to align regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger vehicle miles traveled (VMT) and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

(5) Executive Order B-30-15

In April 2015, Governor Jerry Brown issued EO B-30-15, which had the goal of reducing the State's GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

(6) Senate Bill 32

Signed in September 2016 by Governor Brown, SB 32 updates AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32's scoping plan requirement and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

(7) Executive Order B-55-18

On September 10, 2018, Governor Brown issued EO B-55-18, which established a target for California to achieve carbon net neutrality by 2045. EO B-55-18 identifies the statewide goal to achieve and maintain carbon neutrality as soon as possible, and no later than 2045.

[10] *Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.*

(8) Assembly Bill 1297

Governor Gavin Newsom codified the goals outlined in EO-B-55-18 by the signing of AB 1279 in September 2022. AB 1279 requires the State to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels and to maintain net negative GHG emissions thereafter. AB 1279 tasks CARB with monitoring and regulating GHG emissions to achieve this goal. AB 1297 represents the State's latest and most stringent GHG reduction target.

(9) Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable resources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[11]

(10) Cap-and-Trade Program

The Scoping Plans identify the Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs. CARB designed and adopted the California Cap-and-Trade Project pursuant to its authority under AB 32.

(11) Climate Change Scoping Plan

(a) Assembly Bill 32 Scoping Plan

n 2008, CARB approved a Climate Change Scoping Plan (the "AB 32 Scoping Plan") detailing the approach that California would take to reduce its GHG emissions to 1990 levels by 2020, as required by AB 32. To achieve this, CARB determined that an approximate 28.5 percent reduction in GHG emissions would be necessary. That is, projected 2020 GHG emissions (i.e., emissions that would occur in 2020, absent any GHG-reducing laws and regulations) would have to be reduced by 28.5 percent.

(b) Supplemental FED

Shortly after the adoption of the 2008 Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document. In May 2011, it was found that the environmental analysis of this document's alternatives was not sufficient under CEQA. In response to this ruling, CARB prepared a revised and expanded document, the Supplemental FED, approved in August 2011.

As part of the Supplemental FED, CARB updated the projected 2020 emissions inventory based on then-current economic forecasts (i.e., as influenced by the economic downturn) and GHG

[11] *Senate Bill 350 (2015-2016 Re. Session) Stats 2015, ch. 547.*

emissions reduction measures already in place.[12] Ultimately, CARB determined that achieving the 1990 emissions levels by 2020 would require a reduction in GHG emissions of 16 percent from business-as-usual (BAU) conditions, down from the previous 28.5 percent figure.

(c) First Update

CARB adopted the First Update in 2014, which found that California was on track to meet AB 32's 2020 emissions reduction mandate and determined that, by 2030, the State could reduce its GHG emissions to levels on course with those needed to achieve the 2050 target if the State realized the expected benefits of its existing policy goals.[13] CARB further identified and developed recommended actions for six focus areas key to achieving the 2050 target: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. As noted earlier, the State achieved its 2020 target that was established by AB 32.

(d) 2017 Scoping Plan

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted an update, the 2017 Scoping Plan. It built upon the successful framework established by the AB 32 Scoping Plan and the First Update and identified new, technologically feasible, and cost-effective strategies to ensure that the State meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. It includes policies to require direct GHG emissions reductions at some of the State's largest stationary sources and mobile sources, such as the use of lower GHG fuels, efficiency regulations, and the cap-and-trade program (the "Cap-and-Trade Program"), or carbon tax, which constrains and reduces emissions at covered sources.

CARB's 2030 emissions projections for the State take into account 2020 GHG reduction policies and programs, including the following:

- Addressing GHG emissions from natural and working lands of California, which include the agriculture and forestry sectors.
- Continuation of the Cap-and-Trade Program, which is expected to cover most of the 2030 reduction obligation, or approximately 34 to 79 million metric tons of CO_2 equivalent ($MMTCO_2e$).

[12] *E.g., the million-solar-roofs program, Assembly Bill 1493 (Pavley I) motor vehicle GHG emissions standards, and the Low Carbon Fuel Standard (LCFS). Pavley I, the first GHG standard in the nation for passenger vehicles, took effect for model years starting in 2009 to 2016 and was therefore in place at the time of the 2011 Supplemental FED.*

[13] *The 2050 goal of reducing GHG emissions to 80 percent below 1990 levels was originally established by Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005. However, the 2050 goal was not codified by either AB 32 or SB 32.*

- The State's short-lived climate pollutants strategy, which addresses GHG emissions that remain in the atmosphere for shorter periods of time than longer-lived GHGs like CO_2, is expected to cover approximately 17 to 35 $MMTCO_2e$.
- The Renewables Portfolio Standard (RPS) with its goal of 50 percent renewable electricity by 2030 is expected to cover approximately 3 $MMTCO_2e$.
- The mobile source strategy and sustainable freight action plan are expected to cover approximately 11 to 13 $MMTCO_2e$.
- Doubling the energy efficiency savings in natural gas and electricity end uses by 2030 that is expected to cover approximately 7 to 9 $MMTCO_2e$ of the 2030 reduction obligation.
- Other strategies would be expected to cover the remaining 2030 reduction obligations.

The 2017 Scoping Plan also addresses the role of local governments in meeting the State's GHG reduction goals, because local governments have jurisdiction and land use authority related to community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures. For individual projects under CEQA, the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the State's long-term goals, and climate change science. However, the City of El Segundo has not developed such thresholds for CEQA use.

(e) 2022 Scoping Plan

The 2022 Scoping Plan establishes a scenario by which the State may achieve carbon neutrality by 2045 or earlier, and it outlines a technologically feasible, cost-effective, and equity-focused path for achieving this climate target. The 2022 Scoping Plan addresses the latest climate-related legislation and direction from current Governor Newsom, who, by the signing of AB 1279, required the State to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels by 2045 and to maintain net negative GHG emissions thereafter. The 2022 Scoping Plan relies on the aggressive reduction of fossil fuels in all statewide sectors and accelerating existing carbon reduction programs. Aspects of the 2022 Scoping Plan's scenario include:

- Rapidly moving to zero-emission transportation by electrifying cars, buses, trains, and trucks.
- Phasing out the use of fossil gas used for heating homes and buildings.
- Clamping down on chemicals, refrigerants, and other high global warming potential gases.
- Providing communities with sustainable options for walking, biking, and public transit to reduce reliance on cars.

- Continuing to develop solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy.
- Scale up options such as renewable hydrogen and biomethane for end uses that are hard to electrify.

CARB estimates that successfully achieving the outcomes called for by the 2022 Scoping Plan will reduce demand for liquid petroleum by 94 percent and total fossil fuel by 86 percent in 2045, relative to 2022. The 2022 Scoping Plan also emphasizes the role of natural and working lands and carbon capturing technologies to address residual emissions and achieve net negative emissions.

c) Regional

(1) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG emissions reduction goals outlined by AB 32. SB 375 requires each MPO to adopt an SCS encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and State air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the South Coast Air Quality Management District (SCAQMD), of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG emissions reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region.

The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's Priority Growth Areas (PGAs) and aims to enhance and build out the region's transit network. PGA's such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for just 4 percent of total land in the SCAG region, but they

are projected to accommodate 64 percent of the region's future household growth and 74 percent of the region's future employment growth by 2045.[14] According to the 2020-2045 RTP/SCS, dense infill development in PGAs can help reduce travel distances, increase mobility options, leverage transit investments, and improve access to workplaces and other destinations, reducing vehicle miles traveled (VMT) and, crucially, associated GHG emissions.

The SB 375 GHG reduction targets for the SCAG region correspond with reductions in regional VMT per capita. OPR has recommended that achieving 15 percent lower per capita (residential) or per employee (commercial) VMT than existing development is generally feasible and is supported by evidence that connects these reductions to the State's emissions goals.

(2) SCAQMD CEQA Guidance

The City of El Segundo is located in the South Coast Air Basin (Basin). The SCAQMD is responsible for air quality planning in the Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[15] A GHG Significance Threshold Working Group (the "Working Group") was formed to further evaluate potential GHG significance thresholds.[16] The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less than significant impact on climate change.

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. The SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) or plan level projects. The Working Group's proposed GHG thresholds for project-level analyses and GHG efficiency thresholds for plan-level analyses were not adopted by the SCAQMD Governing Board. The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any other GHG significance thresholds for other jurisdictions.

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[14] *SCAG, Final 2020-2045 RTP/SCS, September 2020.*

[15] *SCAQMD, Board Meeting, December 5, 2008. Agenda No. 31, website: http://www3.aqmd.gov/hb/2008/December/081231a.htm . Accessed August 2023.*

[16] *SCAQMD, Greenhouse Gases CEQA Significance Thresholds, website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed August 2023.*

d) Local

(1) City of El Segundo Climate Action Plan

In December 2017, the City adopted a Climate Action Plan (CAP) to quantify the City's GHG emissions, identify community-wide strategies to lower the City's GHG emissions, and develop an implementation plan for these strategies. The CAP is not CEQA-qualified under the requirements of CEQA Guidelines Section 15183.5 but nevertheless identifies how the City may reduce its GHG emissions in line with the State's AB 32 targets. The CAP determines that implementation of five source strategies – Land Use and Transportation, Energy Efficiency, Solid Waste, Urban Greening, and Energy Generation and Storage – would reduce the City's GHG emissions to 49 percent below 2005 levels by 2035 and put the City "on a path" towards reducing emissions 80 percent below 1990 levels by 2050.

(2) City of El Segundo General Plan

The City does not have a General Plan Element that is specific to climate change or GHG emissions, but the following goals, objectives, and policies would nevertheless have an indirect effect on GHG emissions reductions:

Goal AQ1: Person Work Trip Reduction for Private Employees.

Objective AQ1-1: A 30 percent reduction in private employee work trips in new and existing development through the use of any combination of alternate work weeks and telecommuting strategies.

Policy AQ1-1.1: It is the policy of the City of El Segundo that the City encourage businesses to adopt alternative work schedules and prepare guidelines to assist local businesses in the implementation of alternative work schedule programs.

Policy AQ1-1.2: It is the policy of the City of El Segundo that businesses be encouraged to establish and maintain telecommuting or work-at-home programs to reduce employee work trips.

Policy AQ1-1.3: It is the policy of the City of El Segundo that Transportation System Management (TSM) plans provide a 30 percent reduction in vehicle ridership or the equivalent Average Vehicle Ridership (AVR) per commute vehicle.

Goal AQ2: Person Work Trip Reduction for Local Government Employees.

Objective AQ2-1: A 30 percent reduction in local government employee work trips using any combination of alternative work weeks and telecommuting strategies.

Policy AQ2-1.1: It is the policy of the City of El Segundo that a study be conducted to implement alternative work schedules and work-at-home programs for City employees that will maximize the potential for increasing employee productivity.

Policy AQ2-1.2: It is the policy of the City of El Segundo that the City designate an Employee Transportation Coordinator to promote and institute ridesharing and other programs to achieve a 30 percent reduction in vehicle ridership for City employees.

Goal AQ3: Vehicle work trip reduction for private employees.

Objective AQ3-1: Increase the proportion of work trips made by transit.

Policy AQ3-1.1: It is the policy of the City of El Segundo that the City continue to require employers in existing congested areas of the City and developers of large new developments to adopt Transportation System Management (TSM) plans and provide incentives for the provision of transit support facilities.

Policy AQ3-1.2: It is the policy of the City of El Segundo that it continues to require developer TSM plans to encourage trip reduction programs and development of transit and ridesharing facilities over highway capacity expansion in order to achieve and maintain mobility and air quality.

Policy AQ3-1.3: It is the policy of the City of El Segundo to cooperate with efforts to expand bus, rail, and other forms of transit within the Los Angeles region.

Goal AQ4: Reduced Motorized Transportation.

Objective AQ4-1: Promote non-motorized transportation.

Policy AQ4-1.1: It is the policy of the City of El Segundo that the City actively encourage the development and maintenance of a high-quality network of pedestrian

and bicycle routes, linked to key locations, in order to promote non-motorized transportation.

Goal AQ5: Vehicle Work and Non-Work Trip Reduction.

Objective AQ5-1: Improve transit systems serving the City and implement parking control methods to reduce work and non-work trips.

Policy AQ5-1.1: It is the policy of the City of El Segundo that the City discourage the use of single-occupant vehicles in congested areas of the City by changing or modifying the availability and cost of parking.

Policy AQ5-1.2: It is the policy of the City of El Segundo that the City actively encourage the enhancement of transit performance and availability and establish developer fees to offset the costs of transit improvements required as a result of new developments.

Goal AQ7: Reduce Vehicle Emissions Through Traffic Flow Improvements.

Objective AQ7-1: Set annual objectives for the continued improvement of interconnected traffic signal control systems or appropriate non-interconnected synchronization methods on all streets where traffic volume and delay time is significant.

Policy AQ7-1.1: It is the policy of the City of El Segundo that a high priority be given to improve the flow of traffic through synchronization of signalized intersections, as this is among the most cost-effective means of reducing congestion, conserving energy, and improving air quality.

Goal AQ8: Reduction in Tailpipe Emissions from Local Government Vehicle Fleets.

Objective AQ8-1: Support legislation which would improve vehicle/transportation technology and the conversion of vehicles by fleet operators to the use of “clean fuel.”

Policy AQ8-1.1: It is the policy of the City of El Segundo that the City support legislation for the use and ownership of clean fuel vehicles.

Policy AQ8-1.2: It is the policy of the City of El Segundo that the City support legislation for research, development, and

demonstration of clean fuel vehicles in both fleet service and passenger use.

Policy AQ8-1.3: It is the policy of the City of El Segundo that the City invest in clean fuel systems on new City fleet vehicles.

Goal AQ9: Reduction in Length of Vehicle Trips.

Objective AQ9-1: Improve the City's jobs/housing relationship to achieve a reduction in the average length of commute-trips by the year 2010, as designated by SCAG.

Policy AQ9-1.1: It is the policy of the City of El Segundo that the City promote a better balance of jobs and housing within the City by considering housing proposals within areas of the City designated for Smoky Hollow Mixed-Use.

Policy AQ9-1.2: It is the policy of the City of El Segundo that the City participate in sub regional efforts with other cities or agencies to develop mutually beneficial approaches to improving the balance of jobs and housing.

Policy AQ9-1.3: It is the policy of the City of El Segundo that the City actively encourage the establishment of a shuttle bus system to transport employees and El Segundo residents between the east and west sides of the City.

Goal AQ11: Reduce Emissions Associated with Government Energy Consumption.

Objective AQ11-1: Reduce energy use by City government facilities with an emphasis on peak demand reduction as stated by SCAG.

Policy AQ11-1.1: It is the policy of the City of El Segundo that a study be prepared to initiate implementation of a program for retrofitting City buildings with a full range of energy conservation measures.

Goal AQ12: Reduction in Residential, Commercial, and Industrial Energy Consumption.

Objective AQ12-1: Enact the recommendations of the AQMP Energy Working Group for commercial and residential buildings and adopt ordinances to mitigate air quality impacts from water and pool heating systems.

Policy AQ12-1.1: It is the policy of the City of El Segundo that an ordinance be adopted requiring all new swimming pool water heater systems to utilize solar, electric, or low NO_x gas-fired water heaters, and/or pool covers.

Policy AQ12-1.2: It is the policy of the City of El Segundo that the City encourage the incorporation of energy conservation features in the design of new projects and the installation of conservation devices in existing developments.

Policy AQ12-1.3: It is the policy of the City of El Segundo to provide incentives and/or regulations to reduce emissions from residential and commercial water heating.

Policy AQ12-1.4: It is the policy of the City of El Segundo that new construction not preclude the use of solar energy systems by uses and buildings on adjacent properties and consider enactment of a comprehensive solar access ordinance.

Goal AQ13: Increase Recycling of Solid Waste and Use of Recycled Materials by Glass and Paper Manufacturers.

Objective AQ13-1: Reduce the amount of solid waste by 25 percent by 1994, and 50 percent by 2000.

Policy AQ13-1.1: It is the policy of the City of El Segundo that the City continue to implement the programs proposed in the City's Solid Waste Management Plan, concurrent with California Assembly Bill 939, to achieve a 25% reduction in residential solid waste requiring (disposal by 1995, and a 50% reduction by the year 2000).

Goal C2: Provisions for Alternative Modes of Transportation.

Objective C2-1: Provide a pedestrian circulation system to support and encourage walking as a safe and convenient travel mode within the City’s circulation system.

Policy C2-1.1: Encourage the development of pedestrian linkages to and from the Metro Green Line [C Line] stations to encourage and attract internodal transit/walking trips.

Policy C2-1.2: Develop a citywide system of pedestrian walkways, alleviating the conflict between pedestrians, autos, and bicyclists throughout the City.

Policy C2-1.3: Encourage new developments in the City to participate in the development of the citywide system of pedestrian walkways and require participation funded by the project developer where appropriate.

Policy C2-1.4: Ensure the installation of sidewalks on all future arterial widening or new construction projects, to establish a continuous and convenient link for pedestrians.

Policy C2-1.6: Encourage shopping areas to design their facilities for ease of pedestrian access.

Policy C2-1.7: Closely monitor design practices to ensure a clear pedestrian walking area by minimizing obstructions, especially in the vicinity of intersections.

Objective C2-2: Provide a bikeway system throughout the City to support and encourage the use of the bicycle as a safe and convenient travel mode within the City's circulation system.

Policy C2-2.2: Encourage new development to provide facilities for bicyclists to park and store their bicycles and provide shower and clothes changing facilities at or close to the bicyclist's work destination.

Policy C2-2.3: Develop off-street bicycle paths in corridors where appropriate throughout the City.

Policy C2-2.4: Encourage the use of bicycles for trips to and from elementary, middle, and high schools in the area as well as parks, libraries, and other public facilities.

Policy C2-2.5: Continue coordination of bicycle route planning and implementation with adjacent jurisdictions and regional agencies.

Policy C2-2.6: Encourage design of new streets with the potential for Class I or Class II bicycle routes that separate the automobile, bicycle, and pedestrian to the maximum extent feasible.

Policy C2-2.8: Evaluate bikeway system links with the Metro Green Line [C Line] rail stations and improve access wherever feasible.

Objective C2-3: Ensure the provision of a safe and efficient transit system that will offer the residents, workers, and visitors of El Segundo a viable alternative to the automobile.

Policy C2-3.1: Work closely with the Los Angeles County Metropolitan Transportation Authority (MTA), Torrance Municipal Bus Lines, the El Segundo Employers Association (ESEA), and private businesses to expand and improve the public transit service within and adjacent to the City.

Policy C2-3.2: Ensure that transit planning is considered and integrated into all related elements of City planning.

Objective C2-4: Ensure the use of Transportation System Management (TSM) measures throughout the City, to ensure that the City's circulation system is as efficient and cost effective as possible.

Policy C2-4.2: Continue to increase operational efficiencies of the transportation system by implementing all appropriate TSM measures, including but not limited to improving design standards, upgrading and coordination of traffic control devices, controlling on-street parking, and using sophisticated electronic control methods to supervise the flow of traffic.

Objective C2-5: Ensure the use of Transportation Demand Management (TDM) measures throughout the City, where appropriate, to discourage the single-occupant vehicle, particularly during the peak hours. In addition, ensure that any developments that are approved based on TDM plans incorporate monitoring and enforcement of TDM targets as part of those plans.

Policy C2-5.1: Ensure that TDM measures are considered during the evaluation of new developments within the City, including but not limited to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.

Policy C2-5.3: Encourage the provision of preferential parking for high occupancy vehicles wherever possible.

Policy C3-1.4: Encourage development projects that effectively integrate major transportation facilities with land use planning and the surrounding environment. These joint uses will obtain economic and aesthetic benefits of coordinated design, achieve land conservation in space-short urban areas of El Segundo, and maintain neighborhood continuity in built-up areas affected by future major transportation routes.

Policy C3-1.5: Ensure that transit planning is considered and integrated into all related elements of City Planning.

Policy C3-1.8: Require the provision of adequate pedestrian and bicycle access for new development projects through the development review process.

(3) El Segundo Municipal Code

The City of El Segundo Municipal Code contains various provisions addressing water conservation, transportation demand management, and EV charging that would have an indirect effect on GHG reduction. For example, Chapter 13-21 provides a streamlined permitting process for EV charging stations throughout the City. Chapter 15-16 establishes requirements for major new developments to provide facilities that encourage and accommodate the use of ridesharing, transit, pedestrian, and bicycle commuting as alternatives to single occupant motor vehicle trips.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate Project impacts to GHG/climate change are based on Appendix G of the *State CEQA Guidelines*. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to GHG emissions would occur if the Project would:

Threshold (a): ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and***

Threshold (b): ***Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.***

b) Methodology

(1) Consistency Analysis

To evaluate the Project's GHG emissions impacts pursuant to the two Appendix G checklist questions, the City uses a qualitative analysis that assesses the Project's consistency with the following plans, policies, and regulations adopted to reduce GHG emissions:

- SCAG's 2020-2045 RTP/SCS
- EO B-55-18, AB 1279, and the 2022 Scoping Plan
- City of El Segundo Climate Action Plan

Additionally, to comply with the requirements of CEQA Guidelines, Section 15064.4(a), the analysis includes a good faith estimate of GHG emissions that may result from the Project.

Neither the City nor the SCAQMD has adopted GHG significance thresholds for plan-level projects. SCAQMD has adopted significance thresholds for industrial-type projects for which it is the lead agency, but the SCAQMD industrial thresholds are not relevant to the Project. Moreover, the SCAQMD is not the lead agency for the Project, and the City has not adopted the SCAQMD's thresholds for assessment of this Project's GHG impacts.

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project would conflict with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use planning project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with the 2022 Scoping Plan Update and the City's Climate Action Plan. With respect to EO B-55-18 and AB 1279, CARB's 2022 Scoping Plan provides strategies and programs aimed at achieving their GHG emissions reduction goals, which is a target of 85 percent below 1990 levels by 2045. In other words, consistency with the 2022 Scoping Plan demonstrates a project's consistency with the EO B-55-18 and AB 1279 GHG emissions reduction goals. The City's Climate Action Plan, while not a qualified CAP under CEQA, also outlines strategies that would aid in the achievement of the State's GHG reduction goals.

(2) Quantification of Project GHG Emissions

By amending the land use designation and zoning on eight parcels within the Specific Plan area, the Downtown Specific Plan Update would facilitate construction of projects within the Specific Plan area through 2040. GHG emissions associated with the construction and operations of these future projects were estimated using the California Emissions Estimator Model version 2022 (CalEEMod). Construction of projects facilitated by the Project would generate GHG emissions

due to the use of diesel-powered equipment and construction vehicles throughout the implementation period through 2040. Construction electricity consumption would also result in GHG emissions. The exact location and types of future development are not known, but the general location and types of development can be reasonably anticipated. For example, projects would likely be concentrated along Main Street and would consist mainly of low-rise or mid-rise buildings, in accordance with existing and proposed site-development standards for the Project's districts. Construction would involve phases such as demolition, grading, building construction, paving, and architectural coatings activities. The magnitude of construction-related GHG emissions would be dependent on project-specific factors that are not known at this time (e.g., the types and quantify of equipment utilized by projects, the number of construction vehicle trips generated by projects, etc.), but given the allowable uses and typical construction activities, it is nevertheless possible to estimate the Project's construction-related GHG emissions with CalEEMod, which draws on extensive construction survey data of construction equipment, construction equipment emissions, construction phase lengths, and other factors to estimate emissions. The analysis estimates GHG emissions that would be associated with full buildout of the Project's additional 130,000 square feet of retail and restaurant uses, 200,000 square feet of office space, 24,000 square feet of medical office space, and 300 residential units. Construction assumptions are provided in the appendix to this report. Operations-related assumptions are also provided in the appendix. The analysis addresses GHG emissions from the following operational sources that would be associated with the aforementioned land uses:

- Area Sources: Emissions associated with the on-site use of powered equipment.
- Energy Sources: Emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- Mobile Sources: Emissions associated with a land use's related vehicle travel.
- Water/Wastewater Sources: Emissions associated with energy used to pump, convey, delivery, and treat water.
- Solid Waste Sources: Emissions associated with the disposal of solid waste into landfills.
- Refrigerant Sources: Emissions associated with fugitive GHG emissions related to building air conditioning and refrigeration equipment.

A fundamental difficulty in the analysis of GHG emissions is the global nature of existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing "new" GHG emissions. As a result, there is frequently an inability to conclude whether a project's GHG emissions represent a net global increase, reduction, or no change in GHGs that would exist if the project were not implemented. For example, if a multi-family residential project replaces an existing supermarket, GHG emissions associated with the existing supermarket would not be totally eliminated because former patrons of the supermarket would still drive and get groceries somewhere else, which would continue to generate associated GHG emissions. GHG emissions associated with the new

multi-family residential project would not be totally new, because many residents will have presumably moved there from other housing. Their GHG emissions would be shifted from their old housing to their new housing, but if the new multi-family residential project has access to high quality transit and walkable destinations, then there is a strong likelihood that the residents' GHG per capita would be reduced on average by their move to the new project. Notwithstanding these complexities, the analysis of the Project's GHG emissions is conservative because it assumes all the Project's direct and indirect GHG emissions would be new additions to the atmosphere.

c) Analysis of Project Impacts

Threshold (a): ***Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

Threshold (b): ***Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

(1) Consistency with Plans

As described above, consistency with applicable GHG emissions reduction plans would result in a less than significant impact. The following section describes the extent to which the Project is consistent with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the City's Climate Action Plan. As demonstrated below, the Project would be consistent with these plans, and its GHG impact would therefore be less than significant.

(a) 2020-2045 RTP/SCS

As noted earlier, SCAG's latest 2020-2045 RTP/SCS (Connect SoCal) is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita by 5 percent by 2045.

Generally, projects are considered consistent with the provisions of regional land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new, dense housing and/or job growth in infill locations and PGAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. As explained earlier, PGAs such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for only four percent of the SCAG region's total land area, but the 2020-2045 RTP/SCS anticipates that 64 percent of new household growth and 74 percent of employment growth will occur in these PGAs. The 2020-2045 RTP/SCS supports this concentration of new growth within PGAs: according to the 2020-2045 RTP/SCS, dense infill development in PGAs can reduce travel distances, increase mobility options, increase workplace accessibility, leverage transit investments, and conserve the region's resource areas. Thus, the 2020-2045 RTP/SCS

emphasizes new infill construction in PGAs and assumes a significant increase in development in such locations, in some cases outpacing what is currently anticipated by local general plans. Projects fitting this land use pattern are consistent with the 2020-2045 RTP/SCS.

The Project aims to achieve or bolster this land use pattern within the Specific Plan area. First, the Specific Plan area is already designated a NMA. The 2020-2045 RTP/SCS targets growth in NMAs because of NMAs robust residential to non-residential land use connections and high roadway intersection densities. These features promote safer, multimodal, short trips and can reduce reliance on single occupancy vehicles, reducing VMT and corresponding GHG emissions. Public engagement data for this Specific Plan Update supports this: almost ninety percent of survey respondents listed walking as one of their typical travel modes for accessing the Downtown area. On this basis alone, development of the Project and its land uses within the Specific Plan area would be consistent with the 2020-2045 RTP/SCS's goals to emphasize dense infill development within PGAs. Second, the Project proposes a range of transportation and mobility improvements that would bolster the area's existing walkability and promote alternative transportation modes. For example, the Project proposes the following improvements:

- Pedestrian crossing enhancements at 12 locations
- Area-wide sidewalk curb ramp enhancements
- Bicycle mobility enhancements on two roadway segments
- Area-wide bicycle accommodation and wayfinding enhancements
- Bus stop enhancements at six existing bus stops
- Signal operation enhancements on two roadway segments
- Area-wide intersection control improvements (signage and striping)
- In-road bollard receptacles for temporary street closures at two locations
- Area-wide on-street parking striping enhancements
- Area-wide off-street parking optimization enhancements

By implementing these transportation and mobility improvements and by focusing dense new retail, commercial, and residential uses within a PGA, the Project fits the land use pattern adopted and emphasized by the 2020-2045 RTP/SCS and would not interfere with its VMT reduction goals or its corresponding GHG reduction target.

(b) 2022 Scoping Plan Update

As explained earlier, the 2022 Scoping Plan addresses the recent signing of AB 1279, which codified EO-B-55-18's target for California to achieve and maintain carbon net neutrality by 2045 (equivalent to a reduction in statewide anthropogenic GHG emissions of 85 percent below 1990

levels). The 2022 Scoping Plan establishes a scenario by which the State may achieve this goal by 2045 or earlier.

Implementation of the Project would allow for an additional 130,000 square feet of retail and restaurant land uses, 200,000 square feet of office space, 24,000 square feet of medical office space, and 300 residential units to be developed within the Specific Plan area. However, as explained, the Downtown Specific Plan Update does not propose any actual land use development project. Therefore, the 2022 Scoping Plan's project-specific attributes and considerations have limited applicability to the Project. Nevertheless, the Project is clearly consistent with the 2022 Scoping Plan's GHG reduction strategies for plan-level projects. The 2022 Scoping Plan emphasizes, "the State has long been clear that urban infill projects, particularly in high-resource and low-VMT areas, would be generally supportive of the State's climate and regional air quality goals." It explains:

> "In many cases, land use strategies that support more compact development in infill areas, particularly those already displaying efficient resident travel patterns, have the greatest potential to reduce emissions while also reducing combined housing and transportation costs for Californians and infrastructure costs for local governments due to avoided new roads, public schools, and other sprawl supporting infrastructure. Infill housing development alleviates pressure to develop on the urban periphery, preserving natural and working lands and areas often at risk of wildfire."

The 2022 Scoping Plan describes such infill areas as "climate-smart locations":

> "Climate-smart locations include neighborhoods, commercial corridors, town centers, downtowns, and other areas where residents have access to a broad range of mobility options in addition to private automobiles (such as transit, walking, and biking), as well as where residents have access to housing, jobs, and other key destinations. Such communities make it possible for residents to live, work, and recreate without dependence on a personal car. For trips where driving is required, car trips can be relatively short and public infrastructure should support the use of zero-emission vehicles."

The Project is consistent with these land use strategies to support compact development in a "climate-smart" infill location. The Specific Plan Area is designated a NMA by SCAG's 2020-2045 RTP/SCS, and it is a downtown/town center-type neighborhood with high walkability and accessibility to a range of destinations. The Project would encourage compact urban infill projects in this neighborhood that are designed to leverage and add to the area's walkability and pedestrian environment.

Additionally, the Project also proposes a range of transportation and mobility improvements that would further enhance the area's existing walkability and promote alternative transportation modes. As listed earlier, the Project proposes the following improvements:

- Pedestrian crossing enhancements at 12 locations

- Area-wide sidewalk curb ramp enhancements
- Bicycle mobility enhancements on two roadway segments
- Area-wide bicycle accommodation and wayfinding enhancements
- Bus stop enhancements at six existing bus stops
- Signal operation enhancements on two roadway segments
- Area-wide intersection control improvements (signage and striping)
- In-road bollard receptacles for temporary street closures at two locations
- Area-wide on-street parking striping enhancements
- Area-wide off-street parking optimization enhancements

These improvements would further contribute to the "climate-smart" attributes of the Specific Plan area. Overall, projects such as the Downtown Specific Plan Update are part of the solution for achieving the land use and transportation-related GHG reductions necessary to achieve the State's climate goals. Given these considerations, the Project would not conflict with or obstruct implementation of the 2022 Scoping Plan and its goal to achieve the State's GHG reduction targets under EO B-55-18 and AB 1279.

(c) El Segundo Climate Action Plan

As explained earlier, the City's CAP is not CEQA-qualified under the requirements of CEQA Guidelines Section 15183.5 but nevertheless identifies how the City may reduce its GHG emissions in line with the State's AB 32 targets. The CAP determines that implementation of five source strategies – Land Use and Transportation, Energy Efficiency, Solid Waste, Urban Greening, and Energy Generation and Storage – would reduce the City's GHG emissions to 49 percent below 2005 levels by 2035 and put the City "on a path" towards reducing emissions 80 percent below 1990 levels by 2050. The CAP includes a long list of goals, measures, and sub-strategies under each of the five source strategies, many of which would not apply to the Project, which does not propose any actual land use development project. **Table IV.F-1, Consistency Analysis: El Segundo Climate Action Plan**, assesses the Project's consistency with relevant measures.

Table IV.F-1
Consistency Analysis: El Segundo Climate Action Plan

Measure	Project Consistency
Source Strategy: Land Use and Transportation (LUT)	
LUT A5: Multi-Modal Streets Complete Streets	**Consistent**. This strategy involves encouraging multi-modal streets that accommodate Neighborhood Electric Vehicles that travel at speeds of 25 miles per hour or less by accommodating them on high-speed streets or integrating them with other slow-speed infrastructure such as protected bike lanes. The Project would implement complete streets strategies within the Specific Plan area that promote traffic calming and integration with pedestrian and bicycle facilities.
LUT B1: Facilitate Private and Public Mobility Services (Ride-Hailing, Ride-Sharing, Car-Sharing, Bike-Sharing)	**Consistent.** The Project's bicycle mobility enhancements could help leverage future bike-sharing programs within the City.
LUT C1: Provide a Bus Rapid Transit (BRT) System	**Consistent.** By allowing increases in land use densities within the Specific Plan area, the Project would promote transit supportive densities capable of supporting future BRT service. The Project's pedestrian mobility and bus stop enhancements could also help leverage future BRT service to the Specific Plan area.
LUT C2: Expand Transit Network	**Consistent**. Similarly, by allowing increases in land use densities within the Specific Plan area, the Project would promote transit supportive densities that could support future transit expansion and other transit investment within the Specific Plan area.
LUT D1: Provide Traffic Calming Measures	**Consistent**. The streetscape design and elements implemented by the Project (e.g., bollards, wider sidewalks, etc.) would promote traffic calming and encourage walking, biking, and outdoor dining.
LUT D2: Provide Pedestrian/Bicycle Networks Improvements	**Consistent**. The Project would include numerous pedestrian and bicycle mobility improvements that are listed previously in this report. A central goal of the Project is to promote walking and biking within the Specific Plan area.
LUT D3: Improve Design of Development	**Consistent**. A central goal of the Project is to implement development standards that enhance walking and biking within the Specific Plan area (e.g., building placement, maximum heights, setbacks, relationship to streets and sidewalks, etc.).
LUT E1: Limit Parking Supply	**Consistent**. The Project promotes strategies such as shared parking agreements between businesses to maximize parking efficiency. The Project also reduces the parking requirements for uses on private property compared to the existing Specific Plan.
LUT G1: Increase Density	**Consistent**. The Project would encourage higher density by allowing additional retail, restaurant, office, medical office, and residential uses in the Specific Plan area.
LUT G2: Increase Diversity	**Consistent**. The Project would encourage a mix of compatible retail, commercial, and residential uses within the Specific Plan area.
LUT G3: Increase Destination Accessibility	**Consistent**. The Project involves a downtown neighborhood with a high density of retail and commercial destinations. The Project's mobility enhancements would

Table IV.F-1
Consistency Analysis: El Segundo Climate Action Plan

Measure	Project Consistency
	increase accessibility to destinations within and surrounding the Specific Plan area.
LUT G4: Increase Transit Accessibility	**Consistent**. The Project includes pedestrian and bicycle mobility enhancements, as well as bus stop improvements, that would increase transit accessibility.
Source Strategy: Energy Efficiency (EE)	
EE F1: Promote Tree Planting for Shading and Energy Efficiency	**Consistent**. The Project's design standards would promote street trees, shade trees, and landscaping.
EE I2: Upgrade or Incorporate Water-Conserving Landscape	**Consistent**. The Project would utilize drought-tolerant and California native plants to reduce irrigation and conserve water.
EE I3: Plant Trees for Shade and Carbon Sequestration	**Consistent**. The Project's design standards would promote street trees, shade trees, and landscaping that can reduce surface temperatures and sequester CO_2.
Source: City of El Segundo, Climate Action Plan, December 2017.	

(d) Conclusion

In summary, the Project would be consistent with 2020-2045 RTP/SCS, 2022 Scoping Plan Update, and City of El Segundo Climate Action Plan efforts and strategies to reduce GHG emissions in accordance with the latest and most stringent AB 1279 and SB 375 targets. As a result, the Project's impacts related to GHG emissions and climate change would be less than significant and no mitigation would be required.

(2) Project Emissions

(a) Construction

As explained earlier, construction of projects facilitated by the Downtown Specific Plan Update could occur through 2040. As part of the Project's air quality analysis, construction emissions associated with 10 percent of buildout allowed under the Project (i.e., 20,000 square feet of the allowable 200,000 square feet increase in office uses, etc.) were estimated using CalEEMod. **Table IV.F-2, Construction-Related GHG Emissions**, shows the results of this 10 percent buildout scenario and multiplies the GHG emissions by 10 to estimate construction emissions that would be associated with full buildout of the Project's allowable land use increases. As shown, construction of 100 percent buildout of the Project's allowable land use increases is estimated to generate approximately 34,400 $MTCO_2e$. As recommended by the SCAQMD, the total construction-related GHG emissions were amortized over a 30-year project lifetime (i.e., divided by 30). This results in annual Project construction emissions of approximately 1,147 $MTCO_2e$.

Table IV.F-2
Construction-Related GHG Emissions

Scenario	Emissions $MTCO_2e$
10 percent buildout	344
100 percent buildout	34,400
Amortized over 30 years	**1,147**
Source: NTEC, 2023.	

(b) Operations

Table IV.F-3, Operations-Related GHG Emissions (Full Buildout 2040), shows the Project's estimated GHG emissions from operations associated with 100 percent buildout of the Project's allowable land use increases, including the Project's annualized construction-related GHG emissions that are shown above in **Table IV.F-2, Construction-Related GHG Emissions**. GHG emissions were calculated based on the Project's 2040 horizon year. Operation of the Project in 2040 is estimated to result in approximately 12,773.06 $MTCO_2e$. However, this is likely a very conservative estimate. For example, CalEEMod contains limited data regarding forecasted carbon emissions factors for electric utilities such as Southern California Edison, which would provide electricity to uses in the Specific Plan area. SB 100 requires that 100 percent of electricity provided to retail users in California come from carbon-free sources by 2045, meaning that by 2040, electricity provided by Southern California Edison would likely be nearly carbon free. However, for Southern California Edison, CalEEMod utilizes the same 260.79 lbs/MWh emissions factor for the years 2040 and 2045, demonstrating that CalEEMod does not yet account for this utility's transition to 100 percent renewable energy under SB 100. By 2040, electricity provided to uses within the Specific Plan area would likely be nearly carbon free, and the energy-related emissions shown in **Table IV.F-3, Operations-Related GHG Emissions (Full Buildout 2040),** would be lower than the 1,280 $MTCO_2e$ figure shown. CalEEMod also does not fully account for the declines in area and energy-related GHG emissions that would occur as the State transitions away from natural gas appliances, or the declines in mobile emissions that would result from EO N-79-200, which establishes that 100 percent of in-State sales of new passenger cars and trucks be zero-emission by 2035. Thus, the annual GHG emissions shown in **Table IV.F-3, Operations-Related GHG Emissions (Full Buildout 2040),** should be interpreted as conservative estimates. Actual emissions are likely to be substantially lower.

Table IV.F-3
Operations-Related GHG Emissions
(Full Buildout 2040)

Source	Emissions $MTCO_2e$
Mobile	9,953
Area	34,40012.4
Energy	1,280
Water/Wastewater	129
Solid Waste	251
Refrigerants	0.66
Construction	1,147
Total Emissions	**12,773.06**
Source: NTEC, 2023.	

(c) Conclusion

As stated above, because there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment, and as explained above, the Project would be consistent with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the City of El Segundo Climate Action Plan. Therefore, the Project's impacts related to GHG emissions and climate change would be less than significant and no mitigation would be required. The estimates of the Project's construction and operations-related GHG emissions are shown and discussed above for informational use only.

5. Cumulative Impact Analysis

A cumulatively considerable impact would occur where the impact of the Project, in addition to the Related Projects, would be significant. However, in the case of global climate change, the proximity of the Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to California Air Pollution Control Officers Association (CAPCOA), "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[17] And as explained earlier, the administrative record for the CEQA Guidelines Amendments concerning GHG emissions also clarify that the effects of GHG emissions are inherently cumulative and should be analyzed in this context.[18] As noted above, the analysis of the Project's impact is a cumulative analysis and no further discussion is required. Given that the analyses above found that the Project GHG impacts would be less than significant, the Project's cumulative impacts would be less than significant. Therefore, the cumulative impact related to GHG emissions would be less than significant and the Project's contributions to GHG emissions would not be cumulatively considerable. No mitigation would be required.

6. Mitigation Measures

Impacts with regard to GHG would be less than significant. Therefore, no mitigation measures are required.

[17] *California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008.*

[18] *Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.*

7. Level of Significance After Mitigation

Impacts with regard to GHG would be less than significant.

8. References

California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008.

EPA. Carbon Pollution Standards for Cars and Light Trucks to Remain Unchanged Through 2025, website: https://19january2017snapshot.epa.gov/newsreleases/carbon-pollution-standards-cars-and-light-trucks-remain-unchanged-through-2025_.html. Accessed March 2023.

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SCAQMD, Greenhouse Gases CEQA Significance Thresholds, website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed August 2023.

Senate Bill 350 (2015-2016 Re. Session) Stats 2015, ch. 547.

United States Environmental Protection Agency, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

United States Environmental Protection Agency, Regulatory Announcement: EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

IV. Environmental Impact Analysis

G. Hazards and Hazardous Materials

1. Introduction

This section describes the existing hazards and hazardous materials conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. Information sources used to prepare this section include review of a list of hazardous waste and substances sites (Cortese List) in accordance with California Government Code Section 65962.5. Other sources consulted are listed in **Section IV.G.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Environmental Setting

The City contains a diverse mix of land uses, including a mixture of single- and multi-family residential neighborhoods, corporate office campuses, and both light and heavy industrial land uses, including the Chevron El Segundo oil refinery. The Chevron Refinery occupies approximately one-third of the City and is adjacent to the beach, along with other industrial land uses. The Specific Plan area is surrounded by a variety of land uses, including residential, recreational, and commercial retail uses:

- **Land Uses to the North**: Land uses to the north include El Segundo High School campus, El Segundo Library, and Library Park located on Main Street. Neighborhoods surrounding these civic uses are comprised mainly of single-family dwellings, duplexes, and apartment complexes.

- **Land Uses to the East**: Neighborhoods to the east are comprised of a mix of single-family dwellings, duplexes, and apartment complexes. Areas southeast of the Project area contain the Smoky Hollow Specific Plan area and are developed with light industrial and office uses. El Segundo Recreation Park, located along Pine Avenue and Eucalyptus Drive, provides recreational facilities for a range of sports, including softball, roller hockey, tennis, and basketball.

- **Land Uses to the South**: The Chevron Refinery is south of El Segundo Boulevard.
- **Land Uses to the West**: Less than a mile from the western edge of the Specific Plan is the Pacific Ocean. The neighborhoods between Downtown El Segundo and the coast are comprised mainly of single-family dwellings, duplexes, and apartment complexes.

b) Hazardous Materials

The term "hazardous material" can have varying definitions for different regulatory programs. For the purpose of this EIR, the term "hazardous materials" refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(n)(1) defines hazardous materials as any material that "because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity (Code of Regulations, Title 22). These types of hazardous materials are defined below:

- **Toxic Substances.** Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels. (The level depends on the substances involved and is chemical-specific.) Carcinogens (substances that can cause cancer) are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- **Corrosive Materials**. Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, with the result that numerous industrial properties and public landfills became dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their

eligibility to receive cleanup money from a federal fund established under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA; see **Section IV.G.3, Relevant Plans, Policies, and Ordinances**, for more details about CERCLA). The National Priorities List (NPL) is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the United States Environmental Protection Agency (USEPA) in determining which sites warrant further investigation. Sites are added to the NPL following a hazard ranking system.

In addition to soil and groundwater contamination, the following substances may occur throughout the City in older buildings or products. The effects of these substances and where they are commonly present are explained below.

c) Asbestos Containing Materials (ACMs)

Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1989 for its fireproofing and insulating properties. ACMs were banned by USEPA between the early 1970s and 1991 under the authority of the federal Clean Air Act (CAA) and the Toxic Substances Control Act (TSCA) due to their harmful health effects. Exposure to asbestos increases risk of developing lung disease, such as lung cancer, mesothelioma (a type of cancer), or asbestosis (a type of chronic, non-cancer lung disease).[1] Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Commercial/industrial structures are affected by asbestos regulations if damage occurs or if remodeling, renovation, or demolition activities disturb ACMs. Based on the age of the structures in the Specific Plan area, there is a potential for the presence of ACMs to exist in a wide variety of building materials in the Project area.

d) Lead and Lead-Based Paint (LBP)

Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs. Lead can affect almost every organ and system in the body and can result in behavior and learning problems, lower IQ and hyperactivity, hearing problems, and anemia in children, and cardiovascular effects, decreased kidney function, and reproductive problems in adults.[2] Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils around buildings and structures painted with LBP. LBP was primarily used during the same time period as ACMs. Commercial/industrial structures are affected by lead-based paint regulations if the

[1] *United States Environmental Protection Agency, Learn About Asbestos: Health Effects from Exposure to Asbestos, website: https://www.epa.gov/asbestos/learn-about-asbestos#effects. Accessed October 31, 2023.*

[2] *United States Environmental Protection Agency, Learn About Lead: What are the Health Effects of Lead?, website: https://www.epa.gov/lead/learn-about-lead#effects. Accessed October 31, 2023.*

paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces. Based on the age of the structures in the Specific Plan area, there is potential for structures to contain paints and coatings with detectable or elevated concentrations of lead.

e) Polychlorinated Biphenyls (PCBs)

PCBs are mixtures of up to 209 individual chlorinated compounds. There are no known natural sources of PCBs. PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they do not burn easily and are good insulators. The manufacture of PCBs was banned in the United States in 1979 by the TSCA because of evidence that they build up in the environment and can cause a variety of harmful health effects. Health risks include cancer as well as non-cancer effects on the immune system, reproductive system, nervous system, endocrine system, such as a decrease in the size of the thymus gland, decreased birth weight and gestational age for children born to women exposed to PCBs, and decreased thyroid hormone levels.[3] Products made before 1979 that may contain PCBs include old fluorescent lighting fixtures and electrical devices containing PCB capacitors, and old microscope and hydraulic oils. Based on the age of the structures in the Specific Plan area, there is a potential for structures to contain polychlorinated biphenyl (PCB)-containing materials (such as fluorescent light ballasts), mercury thermometers, and electrical appurtenances.

f) Hazardous Materials Sites

The locations where hazardous materials are used, stored, treated, and/or disposed of comes to the attention of regulatory agencies through various means, including licensing and permitting, enforcement actions, and anonymous tips. To the extent possible, the locations of these businesses and operations are recorded in several database lists maintained by various State, federal, and local regulatory agencies. In some cases, businesses that use hazardous materials in quantities greater than certain established thresholds are required to file business plans with the County of Los Angeles Fire Department (LACoFD). Other businesses that engage in the transport, storage, treatment, or disposal of hazardous materials are required to maintain detailed records of all their hazardous materials-related activities. Federal, State, and local agencies enforce regulations applicable to hazardous waste generators and users, and the LACoFD Health Hazardous Materials Division tracks and inspect hazardous materials handlers to ensure appropriate reporting and compliance.

Permitted uses of hazardous materials include those facilities that use hazardous materials or handle hazardous wastes in accordance with current hazardous materials and hazardous waste regulations. The use and handling of hazardous materials from these sites is considered low risk, although there can be instances of unintentional chemical releases. In such cases, the site would be tracked in the environmental databases as an environmental case. Permitted sites without documented releases are, nevertheless, potential sources of hazardous materials in the soil and/or groundwater (compared to sites where there are no hazardous materials used or stored)

[3] *United States Environmental Protection Agency, Polychlorinated Biphenyls: Health Effects of PCBs, website: https://www.epa.gov/pcbs/learn-about-polychlorinated-biphenyls#healtheffects. Accessed October 31, 2023.*

because of accidental spills, incidental leakage, or spillage that may have gone undetected. Many of the facilities are permitted for more than one hazardous material use, and therefore could appear in more than one database.

The potential to encounter hazardous materials in soil and groundwater in the Project area was based on a search of federal, State, and local regulatory databases that identify permitted hazardous materials uses, environmental cases, and spill sites. The following databases were searched for hazardous sites:

- California Department of Toxic Substance Control (DTSC) EnviroStor Database
- State Water Resources Control Board (SWRCB) GeoTracker Database
- USEPA Superfund Enterprise Management System (SEMS) Database in Envirofacts

The EnviroStor database contains information on properties in California where hazardous substances have been released or where the potential for a release exists. The GeoTracker database contains information on properties in California for sites that require cleanup, such as leaking underground storage tank sites, which may impact, or have potential impacts, to water quality, with emphasis on groundwater. The SEMS database lists Superfund sites that are found on the NPL.

(1) Hazardous Material Sites

There are no current aboveground storage tanks (ASTs) or underground storage tanks (USTs) identified in the Specific Plan Project area.[4] Review of online regulatory databases revealed records pertaining to two former leaking UST (LUST) sites, located at 232 Main Street and 615 Richmond Street, both within the Specific Plan area. The cases are now both closed and no more remediation is necessary.[5,6]

Hazardous materials sites in the Project area identified in applicable databases are discussed below.

(a) DTSC EnviroStor Database

A search of this database for "Active" sites was conducted on August 30, 2023. An "Active" site identifies that an investigation and/or remediation is currently in progress and that DTSC is actively involved, either in a lead or support capacity. No "Active" sites are located within the boundaries of the Specific Plan Project area; however, 12 "Active" sites were identified within a 2-mile radius of the boundaries of the Specific Plan Project area. **Table IV.G-1, DTSC EnviroStor**

[4] *California Department of Conservation, Well Finder, website: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.41622/33.91982/16. Accessed March 2023.*

[5] *State Water Resources Control Board, GeoTracker, online database, website: https://geotracker.waterboards.ca.gov/. Accessed March 2023.*

[6] *California Environmental Protection Agency, Regulated Site Portal, website: https://siteportal.calepa.ca.gov/. Accessed March 2023.*

Database Active Sites in El Segundo lists the "Active" EnviroStor-listed cleanup sites in the Project area.

Table IV.G-1
DTSC EnviroStor Database Active Sites in El Segundo

EPA ID	Site Name	Address	City	Site Type	Status
60003237	128 Maryland St.	128 Maryland St.	El Segundo	Voluntary Cleanup	Active
60002376	1330 East Franklin Ave.	1330 East Franklin Ave.	El Segundo	Voluntary Cleanup	Active
60002642	134 Center St.	134 Center St.	El Segundo	Voluntary Cleanup	Active
60001802	201 N. Douglas St. Property	201 N. Douglas St.	El Segundo	School Cleanup	Active
60003219	330, 348 Kansas St. and 1521 E. Grand Ave.	330, 348 Kansas St. and 1521 E. Grand Ave.	El Segundo	Voluntary Cleanup	Active
CAD008336901	Chevron El Segundo Refinery	324 W. El Segundo Blvd.	El Segundo	Haz-waste RCRA	Active
60001197	El Segundo LLC Generating Station	301 Vista Del Mar	El Segundo	Corrective Action	Active
60002691	Infineon Properties (Former International Rectifier)	1413 E Franklin Ave., 233, 247 Kansa St., and 270 California St.	El Segundo	Voluntary Cleanup	Active
80001311	Northrop Grumman Corp. (WC)	800 N. Dougal St.	El Segundo	Corrective Action	Active
19130119	Radian Services	200 Nevada St.	El Segundo	Voluntary Cleanup	Active
60001344	Raytheon Co.	2030 Maple Ave.	El Segundo	Corrective Action	Active
60002935	Trelleborg Sealing Solutions	2051 E. Maple Ave.	El Segundo	Voluntary Cleanup	Active

Source: Department of Toxic Substance Control, EnviroStor Database, website: https://www.envirostor.dtsc.ca.gov/public/. Accessed August 30, 2023.

(b) SWRCB GeoTracker Database

A search of this database was conducted on August 30, 2023 and identified two "Open" cleanup sites in the Project area and five cases that were completed and closed. A completed and closed site indicates that a closure letter or other formal decision document has been issued for the site. Open sites are categorized as "Assessment and Interim Remedial Action," "Remediation," "Site Assessment," Verification Monitoring," "Reopen Case," "Eligible for Closure," or "Inactive" for sites where no regulatory oversight activities are being conducted by the Lead Agency. **Table IV.G-2, Open Geotracker Sites in El Segundo** lists the "Open" GeoTracker-listed cleanup sites in the Project area.

Table IV.G-2
Open Geotracker Sites in El Segundo

EPA ID	Site Name	Address	City	Site Type	Status
1.T0603703610	Chevron #9-1651	302 El Segundo Blvd.	El Segundo	Cleanup Program Site	Open-Inactive as of 1/27/2015
SL372482441	Chevron El Segundo Refinery	324 El Segundo Blvd.	El Segundo	Cleanup Program Site	Open Remediation as of 3/24/2010

Source: Department of Toxic Substance Control, GeoTracker Database, website: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=El+Segundo#. Accessed August 30, 2023.

(c) USEPA Superfund Enterprise Management System Database

A search of the USEPA database of Superfund sites revealed no Superfund sites or NPL sites in the Project area.[7]

(d) Use, Transport, and Abatement of Hazardous Materials

The use of hazardous materials is typically associated with industrial land uses. Activities such as manufacturing, plating, cleaning, refining, and finishing, frequently involve chemicals that are considered hazardous when accidentally released into the environment. There are several industrial uses scattered throughout the City, including the Chevron Refinery south of the Specific Plan area.

To a lesser extent, hazardous materials may also be used by various commercial enterprises, as well as residential uses. Dry cleaners, in particular, use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides, and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. In fact, most commercial businesses occasionally use commonly available cleaning supplies which, when used in accordance with manufacturers' recommendations, are considered safe by the State of California, but when handled improperly can be considered hazardous. Private residences also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soil or groundwater, or through airborne releases of vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, State, and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous

[7] *United States Environmental Protection Agency, Search for Superfund Sites Where You Live, website: https://www.epa.gov/superfund/search-superfund-sites-where-you-live, Accessed August 31, 2023.*

waste transporters are required to complete and carry a hazardous waste manifest, which is a set of forms, reports, and procedures designed to seamlessly track hazardous waste.

Hazardous materials use is primarily concentrated in the industrial and manufacturing areas of the eastern and southern portions of the City where light and heavy industry are present.[8] Most transportation of hazardous materials through and within the Project area consists of trucks that travel along major thoroughfares in the Project area.[9]

g) Groundwater

In November 1998, the Los Angeles Regional Water Quality Control Board adopted an amendment to the Basin Plan that eliminated beneficial use designations from the West Basin portion of the Los Angeles Coastal Plain groundwater basin, including municipal and domestic water supply.[10] The West Basin is described as the area underlying the Chevron Refinery in El Segundo and nearby areas, partially defined by the Pacific Ocean to the west, Imperial Highway to the north, Pacific Coast Highway to the east, and Valley Boulevard and 15th Street to the south. The Specific Plan area lies within the West Basin, and therefore groundwater beneath the area cannot be used for domestic water supply. This designation is due to saltwater intrusion and regional groundwater contamination, mainly due to the Chevron Refinery. Groundwater was encountered during previous environmental investigations in the area at depths of approximately 70 feet below the existing ground surface.[11] Water is supplied to the Specific Plan area by the City of El Segundo.

h) Methane, Oil, and Gas

Oil fields and oil production activities present a variety of hazards in urbanized areas, including toxic air contaminants and dust from oil production, and the potential of contaminant release into an aquatic environment. Unconstrained oil seepage from oil fields and wells can contaminate the soil and groundwater aquifers.

Methane gas is produced by anaerobic decay of organic matter deep under the Earth's surface and is the major component of natural gas, about 87 percent by volume. In common usage, deposits rich in natural gas (i.e., methane) are called natural gas fields. At room temperature and standard pressure, methane is a colorless, odorless gas. While not toxic, it is highly flammable and may form explosive mixtures with air. Methane is also an asphyxiant and may displace oxygen in an enclosed space; however, the concentrations at which flammable or explosive mixtures form are much lower than the concentration at which asphyxiation risk is significant. Thus, the main

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8 *City of El Segundo General Plan, Hazardous Materials & Waste Management Element, Hazardous Materials Use, Figure HM-1.*

9 *City of El Segundo General Plan, Hazardous Materials & Waste Management Element, Hazardous Waste Main Transportation Corridors identified by the CHP and LACOHMWP, Figure HM-3.*

10 *Los Angeles Regional Water Quality Control Board, Resolution No. 98-018: Amendment to the Water Quality Control Plan to Incorporate Changes in Beneficial Use Designations for Selected Waters. November 2, 1998.*

11 *City of El Segundo, Sepulveda/Rosecrans Site Rezoning and Plaza El Segundo Development Draft EIR, October 2004.*

concern with methane gas is the risk of explosion if methane seeps and accumulates in an enclosed space with air.[12]

The Specific Plan area is located within the El Segundo oil field, which is an active oil drilling field.[13] The northern border of the oil field transects east/west along E Mariposa Avenue. There is one plugged oil and gas well located within the Specific Plan area, near the intersection of Main Street and El Segundo Boulevard. Two active oil and gas wells are located approximately 0.5 miles west of the Specific Plan area; they are owned and operated by El Segundo Oil LLC. The approximately 900-acre Chevron Oil Refinery is located directly south of the Specific Plan area. Two crude oil pipelines, one gasoline pipeline, and one natural gas pipeline run along PCH to the east. Additionally, one jet fuel pipeline runs along Washington Street and the western edge of Freedom Park, 1.0-mile east of the Project area. According to the Los Angeles County Department of Public Works, the Project area is not located within 300 feet of an oil or gas well or 1,000 feet of a methane producing site.[14]

i) Schools

El Segundo High School is located approximately 0.08 mile north of the Specific Plan area. El Segundo Middle School, located at 332 Center Street, is approximately 0.80-mile east of the Project Site, Richmond Street Elementary, located at 615 Richmond Street, is approximately 200 feet northwest of the Specific Plan Project area, and Center Street Elementary, located at 700 Center Street, is approximately 1.0-mile northeast of the Project Site.

j) Airports

LAX is located 0.5-mile north of the Project Site, on the north side of I-105. LAX was established in 1928; commercial airline service began in 1946. The airport covers 3,500 acres, facilitating both commercial and private air traffic. The Airport Influence Area generally extends east/west from the Pacific Coast to I-110 and is based on the Airport Land Use Plan (ALUP) 65 Community Noise Equivalent Level noise contour.[15] The Specific Plan area is not located within the ALUP, and is therefore not subject to the ALUP requirements, including requirements for safety and noise. The Project Site's close proximity to LAX means it is regulated under Code of Federal Regulations (CFR) 14 CFR 77.9 – Construction or Alteration Requiring Notice. There are no additional public use airports located within 2 miles of the Specific Plan area.

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[12] *Los Angeles County Public Works, Methane Mitigation Standards, Gas Hazards Mitigation Policy, Procedures and Guidelines, website: https://dpw.lacounty.gov/epd/swims/docs/pdf/methane/GasHazardPolicy.pdf, Accessed August 31, 2023.*

[13] *California Department of Conservation, Well Finder, website: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.41622/33.91982/16. Accessed March 2023.*

[14] *Los Angeles Department of Public Works, Solid Waste Information Management System, "Do I need Methane Mitigation?", website: https://dpw.lacounty.gov/epd/swims/OnlineServices/search-methane-hazards-esri.aspx. Accessed March 2023.*

[15] *County of Los Angeles, Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan, December 1, 2004.*

k) Fire Hazards and Emergency Response

The Project Site is located in the City of El Segundo, a highly urbanized area that is not subject to wildfire, and is therefore not designated a Very High Fire Hazard Severity Zone.[16] El Segundo is located within a Local Responsibility Area for fire hazards. El Segundo Fire Department is the local agency for fires, environmental safety, and emergency response.

The City of El Segundo has an Emergency Management/Disaster Preparedness team that, among other tasks, creates and maintains emergency plans for the City and coordinates an Emergency Operations Center. The City of El Segundo General Plan includes a Safety Element and a Hazardous Material Element which designate policies for safe hazardous material handling, fire prevention procedures, and emergency response. Los Angeles County Department of Public Works has published disaster routes for each city within its jurisdiction.[17] Pacific Coast Highway is a designated disaster route for the City of El Segundo, which leads to the I-105 evacuation route.

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) U.S. Environmental Protection Agency

(a) Title 40 USC, Chapter 1, Subchapter I, Parts 260-265 – Solid Waste Disposal Act/ Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act (RCRA), establishes requirements for the management of solid wastes (including hazardous wastes), landfills, USTs, and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; and research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

(b) Title 40 USC, Chapter 1, Subchapter I, Part 273 – Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the

[16] *California Department of Forestry and Fire Protection, CAL FIRE Fire Hazard Severity Zones Viewer, website: https://egis.fire.ca.gov/FHSZ/. Accessed March 2023.*

[17] *Los Angeles Department of Public Works, City of El Segundo Disaster Routes, June 25, 2008.*

hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

(c) Title 40 USC, Chapter 1, Subchapter D, Part 112 – Oil Pollution Prevention

Oil Pollution Prevention regulations require the preparation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan if oil is stored in excess of 1,320 gallons in aboveground storage (or have a buried capacity of 42,000 gallons). SPCC regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

(d) Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names ACM as one of these materials. ACM use, removal, and disposal are regulated by the United States Environmental Protection Agency (USEPA) under this law. In addition, notification of friable ACM removal prior to proposed demolition is required by this law.

(e) Title 42 U.S. Code of Federal Regulations, Section 9601 et seq, – Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA / Superfund)

CERCLA, commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, providing for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also establishes the National Priorities List, which is a list of contaminated sites warranting further investigation by the EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.[18]

[18] *United States Environmental Protection Agency, Summary of the Comprehensive Environmental Response, Compensation, and Liability Act (Superfund), website: https://www.epa.gov/laws-regulations/summary-comprehensive-environmental-response-compensation-and-liability-act. Accessed October 31, 2023.*

(f) Title 42 U.S. Code of Federal Regulations, Chapter 116 – Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act provides for public access to information about chemical hazards. The Emergency Planning and Community Right-to-Know Act and its regulations included in United States Code (USC) Title 40 USC Parts 350–372 establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. The USEPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

(g) Title 15 USC, Chapter 53, Subchapter I, Section 2601 et seq. – Toxic Substances Control Act of 1976

The Toxic Substances Control Act of 1976 empowers USEPA to require reporting, record-keeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and also sets requirements for the use, handling, and disposal of ACM as well as for lead-based paint (LBP) waste. As discussed above, USEPA has also established NESHAP, which govern the use, removal, and disposal of ACM as a hazardous air pollutant and mandate the removal of friable ACM before a building is demolished and require notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

(h) Regional Screening Levels

The USEPA provides regional screening levels (RSLs) for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the USEPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision-making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, the DTSC's Human and Ecological Risk Office (HERO) incorporated the USEPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment Note 3, which incorporates HERO recommendations and DTSC-modified screening levels (DTSC-SLs) based on review of the USEPA RSLs. The DTSC-SL should be used in conjunction with the USEPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

(2) U.S. Department of Labor, Occupational Safety and Health Administration

(a) Title 29 USC, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.

(b) Title 29 USC, Part 1910 et seq. – Occupational Safety and Health Standards

Under this regulation, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training; inventory safety equipment relevant to potential hazards; have knowledge on safety equipment use; prepare an illness prevention program; provide hazardous substance exposure warnings; prepare an emergency response plan, and prepare a fire prevention plan.

(3) U.S. Department of Transportation

(a) Title 49 USC, Part 172, Subchapter C – Shipping Papers

The Department of Transportation established standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes, as well as training requirements for personnel completing shipping papers and manifests.

(4) Federal Aviation Administration

(a) Title 14 USC, Chapter 1, Subchapter E, Part 77 – Aeronautics and Space – Safe, Efficient Use, and Preservation of the Navigable Airspace

This regulation establishes requirements for notifying the Federal Aviation Administration (FAA) of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. For example, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

(5) Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003, is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

(6) International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what measures are required to protect against structural fires. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

b) State

(1) California Unified Program for Management of Hazardous Waste and Materials

(a) California Health and Safety Code, Division 20, Chapter 6.11, Sections 25404–25404.9 – Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the California Environmental Protection Agency, the DTSC and Enforcement and Emergency Response Program administer the technical implementation of California's Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level. CUPAs implement the hazardous waste and materials standards. This program was established under the amendments to the California Health and Safety Code (HSC) made by Senate Bill 1082 in 1994. The programs that make up the Unified Program are as follows:

- Aboveground Petroleum Storage Act Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention Program

- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans [HMBPs])
- Hazardous Material Management Plan and Hazardous Material Inventory Statements
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the Project Site is the City of El Segundo Fire Department.

(b) Title 19 CCR, Chapter 2, Subchapter 3, Sections 2729-2734/California HSC Division 20, Chapter 6.95, Sections 25500–25520

This regulation requires the preparation of an HMBP by facility operators. The HMBP identifies the hazards, storage locations, and storage quantities for each hazardous chemical stored on-site. The HMBP is submitted to the CUPA for emergency planning purposes. The Project Site is currently subject to these requirements and there is an HMBP in place.

(2) Hazardous Waste Management

(a) Title 22 CCR, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste

In California, the DTSC regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off-site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31 – Waste Minimization, Article 1 – Pollution Prevention and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms per year of typical, operational hazardous waste evaluate their waste streams every four years and, as applicable, select and implement viable source reduction alternatives. This Act does not apply to non-typical hazardous waste, including ACM and PCBs, among others.

(b) Title 22 California HSC, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards

that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

(c) Human Health Risk Assessment Note 3 –DTSC-Modified Screening Levels

Human Health Risk Assessment Note Number 3 presents recommended screening levels (derived from the USEPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-SL should be used in conjunction with the USEPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

(3) Aboveground and Underground Petroleum Storage Tanks

(a) Title 22 California HSC, Division 20, Chapter 6.67, Sections 25270 to 25270.13 – Aboveground Petroleum Storage Act

This law applies if a facility is subject to SPCC regulations under Title 40 USC Part 112, or if the facility has 10,000 gallons or more of petroleum in any or combination of ASTs and connecting pipes. If a facility exceeds these criteria, it must prepare a SPCC plan.

(b) Low-Threat Underground Storage Tank Case Closure Policy

This policy applies to petroleum UST sites subject to Chapter 6.7 of the Health and Safety Code. This policy establishes both general and media-specific criteria. If both the general and applicable media-specific criteria are satisfied, then the leaking UST case is generally considered to present a low threat to human health, safety, and the environment. This policy recognizes, however, that even if all of the specified criteria in the policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the policy inappropriate.

Regional Water Boards and local agencies have been directed to review all cases in the petroleum UST Cleanup Program using the framework provided in this policy. These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each UST case meets the criteria in this policy or is otherwise appropriate for closure based on a site-specific analysis.

2. If the case does not satisfy the criteria in this policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.

3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site in a format acceptable to the Executive Director.

(4) Environmental Cleanup Levels

(a) Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs were developed by San Francisco Bay Regional Water Quality Control Board; however, they are used throughout the state. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California currently use the ESLs (as opposed to RSLs). In general, the ESLs could be used at any site in the State of California, provided all stakeholders agree.[19] In Dudek's recent experience, regulatory agencies in the Southern California region use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to a LUST; those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

(5) California Integrated Waste Management Board

(a) Title 14 CCR, Division 7, Chapter 8.2 – Electronic Waste Recovery and Recycling Act of 2003

This regulation sets requirements regarding the use and disposal of hazardous substances in electronics. When discarded, the DTSC considers the following materials manufactured before 2006 to be hazardous waste: cathode ray tube devices, liquid crystal display (LCD) desktop monitors, laptop computers with LCD displays, LCD televisions, plasma televisions, and portable DVD Players with LCD screens.

(6) California Department of Transportation/California Highway Patrol

(a) Title 13 CCR, Division 2, Chapter 6

California regulates the transportation of hazardous waste originating or passing through the state. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakage and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP. CHP conducts regular inspections of licensed transporters to ensure regulatory compliance. Caltrans has emergency chemical spill identification teams at locations throughout the state. Hazardous waste must be regularly removed from generating sites by

[19] *San Francisco Bay Regional Water Quality Control Board). 2019. Frequently Asked Questions, Environmental Screening Levels, 2019 Update.*

licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

(7) Occupational Safety and Health

(a) Title 8 CCR – Safety Orders

Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration (CalOSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the California Code of Regulations (CCR). CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances. The hazard communication program also requires that Material Safety Data Sheets be available to employees and that employee information and training programs be documented.

In Division 1, Chapter 4, Subchapter 4 – Construction Safety Orders of Title 8, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

CalOSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations 8 CCR 1529. Only a CalOSHA-Certified Asbestos Consultant can provide asbestos consulting (as defined by the Business and Professions Code, 7180–7189.7, and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement project design, contract administration, supervision of site surveillance technicians, sample collection, preparation of asbestos management plans, and clearance air monitoring.

(8) Asbestos and Air Quality

(a) Enforcement of the NESHAP Regulation, HSC Section 39658(b)(1)

The California Air Resources Board is responsible for overseeing compliance with the federal Asbestos NESHAPs in Los Angeles County. The Asbestos NESHAP Program enforces compliance with the federal NESHAP regulation for asbestos and investigates all related complaints, as specified by HSC Section 39658(b)(1). Of the 35 air districts in California, 16 of these districts do not have an asbestos program in place. In these “non-delegated” districts, a demolition/renovation notification is required for compliance with the Asbestos NESHAP. (This notification is not equivalent to a permit.) The California Air Resources Board reviews and

investigates the notifications. The program also administers two annual statewide asbestos NESHAP task force meetings for air districts and USEPA to facilitate communication and enforcement continuity, and assists USEPA in training district staff to enforce the asbestos NESHAP.

(b) Contractors State License Board

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

(9) Lead-Based Paint

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner. The specific regulations are as follows:

(a) California Health and Safety Code Sections 124125 to 124165

Declared childhood lead exposure as the most significant childhood environmental health problem in the state. Established the Childhood Lead Poisoning Prevention Program and instructed it to continue to take steps necessary to reduce the incidence of childhood lead exposure in California.

(b) California Health and Safety Code Sections 105275 to 105310

Reaffirmed California's commitment to lead poisoning prevention activities; provided the California Department of Public Health with broad mandates on blood lead screening protocols, laboratory quality assurance, identification, and management of lead exposed children, and reducing lead exposures.

(c) California Health and Safety Code Section 105250

Establishes a program to accredit lead-related construction training providers and certify individuals to conduct lead-related construction activities.

(d) California Civil Code Section 1941.1; California Health and Safety Code Sections 17961, 17980, 124130, 17920.10, 105251 to 105257

Deems a building to be in violation of the State Housing Law if it contains lead hazards, and requires local enforcement agencies to enforce provisions related to lead hazards. Makes it a crime for a person to engage in specified acts related to lead hazard evaluation, abatement, and

lead-related constructions courses, unless certified or accredited by the Department. Permits local enforcement agencies to order the abatement of lead hazards or issue a cease and desist order in response to lead hazards.

(e) California Civil Code Sections 1102 to 1102.16

Requires the disclosure of known lead-based paint hazards upon sale of a property.

(f) California Education Code Sections 32240 to 32245

Implemented a lead poisoning prevention and protection program for California schools for a survey to ascertain risk factors that predicted lead contamination in public schools. The survey was completed in 1998. Findings of the survey are under Materials and Products.

(g) California Labor Code Sections 6716 to 6717

Provides for the establishment of standards that protect the health and safety of employees who engage in lead-related construction work, including construction, demolition, renovation, and repair.

(h) California Health and Safety Code Sections 116875 to 116880

Requires the use of lead-free pipes and fixtures in any installation or repair of a public water system or in a facility where water is provided for human consumption.

(i) California Health and Safety Code Sections 105185 to 105197

Establishes an occupational lead poisoning prevention program to register and monitor laboratory reports of adult lead toxicity cases, monitor reported cases of occupational lead poisoning to ascertain lead poisoning sources, conduct investigations of take-home exposure cases, train employees and health professionals regarding occupational lead poisoning prevention, and recommended means for lead poisoning prevention.

(10) California Building Standards Commission

(a) Title 24 of the CCR – California Building Standards Code

The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and

- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

Among other rules, the Code contains requirements regarding the storage and handling of hazardous materials. The Chief Building Official at the local government level (i.e., City of El Segundo) must inspect and verify compliance with these requirements prior to issuance of an occupancy permit.

(b) California Building Code – Chapter 7A

This chapter of the California Building Code establishes minimum standards for buildings located in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire.

(11) California Forestry and Fire Protection

(a) 2010 Strategic Fire Plan for California

Public Resources Code Sections 4114 and 4130 authorize the State Board of Forestry to establish a fire plan that establishes the levels of statewide fire protection services for State Responsibility Area lands. These levels of service recognize other fire protection resources at the federal and local level that collectively provide a regional and statewide emergency response capability. In addition, California's integrated mutual aid fire protection system provides fire protection services through automatic and mutual aid agreements for fire incidents across all ownerships. The California Fire Plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and to contribute to ecosystem health.

(12) California State Fire Marshal

(a) Title 19 CCR, Division 1, Chapter 10 – Explosives

This regulation addresses the sale, transportation, storage, use, and handling of explosives in California. Requirements for obtaining permits from the local Fire Chief having jurisdiction and blasting guidelines (such as blasting times, warning devices, and protection of adjacent structures and utilities) are also explained in Chapter 10 of Title 19.

(13) California Emergency Services Act

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other

agencies, including the EPA, California Highway Patrol, Regional Water Quality Control Boards, air quality management districts, and county disaster response offices.

(14) California Accidental Release Prevention Program

Similar to the USEPA Risk Management Program, the California Accidental Release Prevention (CalARP) Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit an HMBP to the local CUPA via the California Environmental Reporting System. As part of the HMBP, a facility is further required to specify applicability of other state regulatory programs. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the USEPA Risk Management Program, which was established pursuant to the Clean Air Act Amendments.

(15) California Dig Alert

(a) California Government Code 4216

In accordance with California Government Code 4216.2, an excavator planning to conduct an excavation shall notify the appropriate regional notification center of the intent to excavate between 2 and 14 calendar days prior to excavation activities. When the excavation is proposed within 10 feet of a “high priority subsurface installation,” which includes high pressure natural gas and petroleum pipelines, the operator of the high priority subsurface installation shall notify the excavator of the existing of the installation and set up an onsite meeting to determine actions required to verify location and prevent damage to the installation. The excavator shall not begin excavating until the onsite meeting is complete.

c) Regional and Local

(1) South Coast Air Quality Management District Rule 1113

South Coast Air Quality Management District (SCAQMD) Rule 1166, Architectural Coating, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

(2) South Coast Air Quality Management District Rule 1166

SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: 1) The excavation of an underground storage tank or piping which has stored volatile organic compounds (VOCs); 2) The excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; 3) The handling or storage of VOC-

contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site; and 4) The treatment of VOC-contaminated soil at a facility. This rule sets requirements to control the emission of VOCs from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

(3) South Coast Air Quality Management District Rule 1403

SCAQMD Rule 1403, Asbestos Emissions from Renovation/Demolition Activities, regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and clean up procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of structures with ACMs, asbestos storage facilities, and waste disposal sites.

(4) Los Angeles County Operational Area Emergency Response Plan

The County of Los Angeles developed the Emergency Response Plan (ERP) to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. The ERP does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or extraordinary emergency response. The purpose of the plan is to incorporate and coordinate all facilities and personnel of the County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid, and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

(5) Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan (ALUC)

State law requires the creation of Airport Land Use Commissions (ALUCs) to coordinate planning for the area surrounding public use airports. In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the ALUC and for coordinating the airport planning of public agencies within the county. As part of their responsibilities, the ALUC is also required to prepare and adopt a Comprehensive Land Use Plan (CLUP). The Los Angeles County Airport Land Use Plan serves as the CLUP for the county and provides for the orderly expansion of Los Angeles County's public use airports and the area surrounding them. It is intended to provide for the adoption of land use measures that will minimize the public's exposure to excessive noise and safety hazards. In formulating this plan, the Los Angeles County ALUC has established

provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.

(6) City of El Segundo General Plan

Hazardous Materials and Waste Management Element

The City of El Segundo has adopted multiple goals associated with hazardous material and waste management in order to assist in meeting state, federal, and county goals. The City's General Plan was created in conformance with the Los Angeles County Hazardous Waste Management Plan. The following policies apply to the Project.[20]

Goal HM1: Protect Public Health and Safety of citizens and businesses within El Segundo and neighboring communities.

Goal HM2: Minimize risks to citizens and businesses of El Segundo from hazardous materials and wastes, while acknowledging the role of industrial users in the City.

Objective HM2-1: Maintain and update a comprehensive emergency plan consisting of measures to be taken during and after hazardous materials spills.

Goal HM3: Ensure compliance with State laws regarding hazardous materials and waste management.

Objective HM3-1: Assist the State and County as appropriate in the dissemination of regulatory information about hazardous materials and waste to the public and businesses.

Policy HM3-1.1: Ensure, through appropriate cooperation with State and County enforcement agencies, that all companies within the City comply with applicable hazardous material management laws.

Policy HM3-1.2: Review existing City Zoning Code to determine if stricter permitting procedures, hazardous materials and waste transportation, and other safety considerations are necessary to meet recent changes in Hazardous Material Suppression standards.

[20] *City of El Segundo. El Segundo General Plan, Chapter 11, Hazardous Materials and Waste Management Element, website: https://www.elsegundo.org/Home/ShowDocument?id=371. Accessed March 2023.*

Goal HM4: Assist in meeting State, Federal, and County hazardous materials and waste management goals, as these are consistent with City goals.

Goal HM5: Assist in meeting State and County goals to reduce hazardous waste generation to the maximum extent possible.

Objective HM5-1: Identify all generators and transporters of hazardous materials and wastes within the City, and either establish a system to monitor the transportation and disposal of these wastes or access the existing State system.

Policy HM5-1.1: Adopt waste minimization as a first priority in waste management strategies in the City.

Policy HM5-1.2: Require all businesses generating hazardous wastes within the City to submit annual status reports to the County Department of Public Works.

Policy HM5-1.3: Assist the State and County, as appropriate, in providing information needed by the public and industries to take rational steps to minimize, recycle, treat, and otherwise manage hazardous wastes.

Goal HM6: Identify areas within the City potentially suitable for siting hazardous waste management facilities consistent with the criteria presented in the LACoHWMP and consistent with the City General Plan.

Public Safety Element

The City of El Segundo's Public Safety Element was created to reduce death, injuries, property damage, and economic and social dislocation resulting from natural and human-caused hazards, such as urban fire, flooding, mudslides, earthquakes, and hazardous incidents. The following policies apply to the Project.[21]

Goal PS3: Reduce threats to public health and safety from hazardous materials, especially threats induced by earthquakes and accidental leaks and spills.

Objective PS3-1: It is the objective of the City of El Segundo that the City insure safe and prudent use of hazardous materials, and reduce the quantity of hazardous materials handled within the City.

Policy PS3-1.1: Review proposed development projects involving the use, storage, and disposal of hazardous

[21] *City of El Segundo. El Segundo General Plan, Chapter 10, Public Safety Element, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed March 2023.*

materials with the intent of minimizing the probability and magnitude of a hazardous event.

Policy PS3-1.2: Promote the safe transportation of hazardous materials.

Policy PS3-1.3: Improve the plans and capabilities for responding to hazardous material incidents.

Policy PS3-1.5: Encourage improved, timely communications between businesses and emergency response agencies regarding hazardous materials prior to and during incidents.

Goal PS4: Prevent exposure of people, animals, and other living organisms to toxic water and soil contaminants.

Objective PS4-1: Monitor industries and activities in and around the City to prevent and reduce the contamination of water and soil.

Policy PS4-1: Monitor industries and activities in and around the City to prevent and reduce the contamination of water and soil.

Policy PS4-1.1: It is the policy of the City of El Segundo to use its best efforts to protect residents, visitors, and the environment of the City from the effects of toxic water and soil contaminants by identifying major sources in and around the City and by promoting compliance with all federal, state, regional, and local regulations.

Policy PS4-1.2: It is the policy of the City of El Segundo to draft and implement ordinances or take other actions, where deemed appropriate by the City Council in its discretion, to restrict and/or reduce water and soil contamination from sources in and around the City.

Goal PS6: A fire safe community.

Policy PS6-1.1: Review projects and development proposals, and upgrade fire prevention standards and mitigation measures in areas of high urban fire hazard.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate the Project impacts related to hazards and hazardous materials are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to hazards and hazardous material would occur if the Project would:

Threshold (a): ***Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;***

Threshold (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;***

Threshold (c): ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;***

Threshold (d): ***Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65762.5 and, as result, would it create a significant hazard to the public or the environment;***

Threshold (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;***

Threshold (f): ***Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and***

Threshold (g): ***Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.***

b) Analysis of Project Impacts

Threshold (a): ***Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Project is a revision to the existing El Segundo Downtown Specific Plan. Potential future projects would be comprised of residential, office, medical office, retail, and restaurant uses on sites that are currently developed.

The proposed Specific Plan Update would potentially increase the density of these types of uses; however, the occasional use or disposal of hazardous materials generally associated with these

types of uses include unused paint, aerosol cans, cleaning agents (solvents), landscaping-related chemicals, and other common cleaning products and household substances. These materials are generally disposed of at non-hazardous Class II and III landfills (along with municipal solid waste).

Due to mandatory compliance with the required procedures and guidelines during construction and throughout operation, impacts to the public and the environment associated with future development due to the routine transport, use, and disposal of hazardous materials would be less than significant and no mitigation would be required.

Threshold (b): Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

(1) Construction

The Project is a revision to the existing El Segundo Downtown Specific Plan. Implementation of the Project would introduce new retail and restaurant uses, office uses, medical office uses, and residential units. Construction of future projects in the Specific Plan area could involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur.

In addition, the soils in the Specific Plan area may contain contamination. Construction activities involving disturbance of contaminated soils could potentially create a significant hazard for construction workers and adjacent properties through upset or accident conditions. Redevelopment, renovation, and demolition of structures built before 1978 (for LBPs) and 1989 (for ACMs) could potentially release asbestos or lead into the atmosphere. However, compliance with federal, State, and local regulations, would reduce this impact to a less than significant level.

(2) Operation

Operation of the Project would include retail and restaurant uses, office uses, medical office uses, and residential units. Such uses would include the use and storage of common hazardous materials similarly used in Project area residences and businesses today, with similar risk of upset or accident conditions that would create health or safety risks. The extent and exposure of individuals to hazardous materials would be limited by the relatively small quantities of these materials that would be stored and used on individual properties and transported along roads throughout the Project area. Although common maintenance products and chemicals may be used in new development projects, these hazardous materials would not pose any greater risk compared to other similar development or to existing conditions. Compliance with warning labels and storage recommendations from individual manufacturers would ensure people in the Project area would not be exposed to unusual or significant risks from hazardous materials.

Furthermore, businesses that use, store, or transport large quantities of hazardous materials are required to comply with health and safety, and environmental protection laws and regulations previously described, which require businesses handling or storing certain amounts of hazardous

materials to prepare a hazardous materials business plan. This plan includes an inventory of hazardous materials used or stored on-site and procedures to be used in the event of a significant or threatening significant release of a hazardous material. The hazardous materials plan must include a Safety Data Sheet (SDS) for each hazardous material used or stored. To accomplish this, and to otherwise provide a safe and healthy environment, businesses that use hazardous materials must implement health and safety policies and procedures. In addition, future development in the Project area would be required to conform with applicable environmental review processes and environmental regulations related to hazardous materials storage, use and transport. Existing hazardous materials regulations would minimize the potential for the public to be exposed to adverse health or safety effects associated with the accidental release of hazardous materials into the environment and impacts would be less than significant.

(3) Conclusion

In conclusion, all construction and operational impacts related to release of hazardous materials from the use or transport of hazardous would be less than significant and no mitigation would be required.

Threshold (c): 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?

El Segundo High School is located approximately 0.08 mile north of the Specific Plan area. El Segundo Middle, located at 332 Center Street, is approximately 0.80-mile east of the Project Site, Richmond Street Elementary, located approximately 200 feet northwest of the Specific Plan Project area, and Center Street Elementary, located at 700 Center Street, is approximately 1.0-mile northeast of the Project Site.

To ensure that workers and others at individual development sites within the Project area are not exposed to unacceptable levels of risk associated with the use and handling of hazardous materials, employers and businesses are required to implement existing hazardous materials regulations, with compliance monitored by the State (e.g., OSHA in the workplace or DTSC for hazardous waste) and the City. Similarly, future development in the Project area would be required to comply with applicable federal, State, and local environmental regulations related to new construction and hazardous materials storage, use, and transport. California Health and Safety Code Chapter 6.95 “Hazardous Materials Release Response Plans and Inventory” requires businesses that handle more than a specified number of hazardous materials to submit a Hazardous Materials Business Plan. Such businesses are required to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled. In addition, various federal, State, and local regulations and guidelines pertaining to abatement of, and protection from, exposure to asbestos, lead, and other hazardous materials have been adopted for demolition activities and would apply to all new development. All demolition or renovation that could result in the release of lead and/or asbestos must be conducted according to Cal/OSHA standards.

Compliance with existing regulations would ensure that schools and the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction and operational activities.

The Project would not involve direct handling or emissions of hazardous material. Thus, it would not involve direct handling or emissions of hazardous materials within 0.25 mile of schools. Additionally, reasonably anticipated development from the Proposed Project in the Project area will foreseeably comply with all applicable local, State, and federal laws and regulations, would regulate, control, or respond to hazardous waste transport, storage, disposal, and clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors.

Thus, impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school due to future Project area development would be less than significant and no mitigation would be required.

Threshold (d): Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65762.5 and, as result, would it create a significant hazard to the public or the environment?

DTSC's EnviroStor Database and the GeoTracker Database were searched on August 30, 2023 for listed occurrences on properties within the Specific Plan area. DTSC's EnviroStor Database identified 12 "Active" sites in the Project area. An "Active" site identifies that an investigation and/or remediation is currently in progress and that DTSC is actively involved, either in a lead or support capacity. **Table IV.G-1, DTSC EnviroStor Database Active Sites in El Segundo** lists the "Active" EnviroStor-listed cleanup sites in the Project area.

GeoTracker Database identified two "Open" cleanup sites in the Project area and five cases that were completed and closed. A completed and closed site indicates that a closure letter or other formal decision document has been issued for the site. Open sites are categorized as "Assessment and Interim Remedial Action," "Remediation," "Site Assessment," Verification Monitoring," "Reopen Case," "Eligible for Closure," or "Inactive" for sites where no regulatory oversight activities are being conducted by the Lead Agency. **Table IV.G-2, Open Geotracker Sites in El Segundo,** lists the "Open" GeoTracker-listed cleanup sites in the Project area.

Additionally, the CalEPA list of solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit and the CalEPA list of hazardous waste facilities subject to corrective action were also searched on the same date. The CalEPA list of active Cease and Desist (CDO) and Cleanup and Abatement Orders (CAO) was unavailable for searching. However, a review of information from the GeoTracker and EnviroStor websites does not show that any of the sites within the Specific Plan area are subject to either CDOs or CAOs. EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database indicated no active CERCLIS sites within the Specific Plan area.

Additionally, the El Segundo Chevron Refinery is immediately to the south, across El Segundo Boulevard. The El Segundo Chevron Refinery is on both **Table IV.G-1**, and **Table IV.G-2**. Although not in the Specific Plan area, and thus not normally considered by CEQA, the Chevron

Refinery is included in the table and is considered in this EIR given its immediate proximity to the Specific Plan area, its active land use restrictions, its active operating permit, and its potential to release hazardous material into the plan area.

Existing sites on the DTSC's EnviroStor Database list within the Specific Plan Update area would not be directly affected by implementation of the Specific Plan Update since the Plan does not directly involve development activity. Plan regulations could lead to the redevelopment of a site on the DTSC's EnviroStor Database list. However, any project that involved these properties would require additional CEQA review and would be evaluated for the impact to the environment from known contamination, based on the nature of the proposed project. Any future activities at DTSC's EnviroStor Database list sites within Specific Plan Update will be subject to site-specific mitigation protocols administered by DTSC and other jurisdictional agencies in conformance with federal, State, regional, and local regulations.

The Specific Plan area is located within the El Segundo oil field, which is an active oil drilling field.[22] The northern border of the oil field transects east/west along E Mariposa Avenue. There is one plugged oil and gas well located within the Specific Plan area, near the intersection of Main Street and El Segundo Boulevard. Two active oil and gas wells are located approximately 0.5 miles west of the Specific Plan area; they are owned and operated by El Segundo Oil LLC. Therefore, there is the potential for unidentified soil, soil vapor, and/or groundwater contamination to be present on the Project Site. Thus, construction activity that disturbs soil or groundwater could have the potential to result in the release of hazardous materials, which could adversely affect construction workers and/or neighboring properties. In addition, operation of redeveloped properties with known impacts remaining onsite have the potential to adversely affect onsite occupants. To address such possible concerns, it is common for a Phase I Environmental Site Assessment (ESA) to be conducted prior to excavation and construction activity. The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs) associated with soil and groundwater contamination. The scope of work for the Phase I ESA consists of four elements: records review, site reconnaissance, interviews, and report preparation. The Phase I ESA determines whether there are any known contaminated sites located near the site or if current or historical uses of the site could have resulted in contamination of the soil or groundwater. Based on the results of the Phase I ESA, a Phase II ESA (subsurface investigation) may be warranted to determine whether any identified RECs involve contamination exceeding regulatory action levels. If contamination exceeding action levels is identified, additional subsurface investigations and/or remediation with regulatory oversight from an appropriate agency may be warranted. Depending on the level and type of contamination, the oversight agency could be the City, County of Los Angeles, RWQCB, DTSC, or USEPA. Remedial actions would typically involve removal and proper disposal, capping, or treatment of contaminated soil or groundwater, construction of vapor barriers, or other engineering controls.

The process described above would normally identify, and as necessary, assess and remediate soil, soil vapor, and/or groundwater contamination. Remediation of contamination exceeding

[22] *California Department of Conservation, Well Finder, website: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.41622/33.91982/16. Accessed March 2023.*

regulatory action levels would address potential impacts during ground disturbance and improve conditions in the long term. However, because there is not a specific legal requirement for a Phase I ESA for all excavation or construction, there is the potential for soil, soil vapor, and/or groundwater contamination to go undetected. Thus, future grading and construction would have the potential to result in exposure of Project area construction workers and occupants of neighboring properties, and onsite occupants during operation to releases of hazardous materials. With the incorporation of **Mitigation Measure (MM) HAZ-1**, construction and operation impacts relating to sites on DTSC's list, and unidentified hazardous materials would be reduced to a level of less than significant with mitigation.

Threshold (e): Would the Project be 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?

The Comprehensive Land Use Plan (CLUP) for airports within Los Angeles County was adopted in December 1991 and revised 2004 by the Los Angeles County ALUC. The CLUP includes policies intended to safeguard the general welfare of the inhabitants within the vicinity of the airport and ensure that new surrounding uses do not affect the airport's continued safe operation. As part of their CLUP, for each of the public use airports in Los Angeles County, the ALUC has adopted planning boundaries, known as airport influence areas (AIAs), which delineate areas subject to noise impacts and safety hazards (height restriction areas and approach surface and runway protection zones).

LAX is located 0.5-mile north of the Project Site, on the north side of I-105. LAX was established in 1928; commercial airline service began in 1946. The airport covers 3,500 acres, facilitating both commercial and private air traffic. The Airport Influence Area (AIA) associated with LAX generally extends east/west from the Pacific Coast to I-110 and is based on the 65 Community Noise Equivalent Level (CNEL) noise contour for the airport established in the ALUC's CLUP.[23] Three parcels located in the northern end of the Specific Plan area (specifically those parcels located along Main Street south of Mariposa Avenue) are located within the AIA associated with LAX.

Pursuant to Policy 1.5.1(a) and (b) of the County ALUC Review Procedures (Review Procedures), any amendment to a specific plan affecting property within an AIA requires a referral to the ALUC for a determination of consistency with the applicable airport land use plan (in this case, the CLUP). The ALUC has reviewed the proposed Specific Plan Update for its potential to result in impacts related to exposure to aircraft noise, land use safety, protection of airport airspace, and overflight annoyance as listed in Policy 1.4.1 of the Review Procedures. The ALUC identified that no land use designations or zone changes are proposed, existing height limits would not be modified, no new land uses are proposed for the Main Street District, which includes the three parcels located within the AIA for LAX, and changes proposed for the allowable density would not create any impacts as "all three parcels are located well south of the existing 65 CNEL noise

[23] *Los Angeles County, Airport Land Use Commission, Los Angeles International Airport, Airport Influence Area, May 13, 2003, website: https://case.planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf. Accessed November 2, 2023.*

contours and they are not within established flightpaths nor near a runway protection zone of the airport."[24] This is supported by quarterly noise monitoring reports for LAX, which show that all areas within the Specific Plan, including those parcels located within the AIA established for LAX in the CLUP, are located outside of the 65 CNEL contour.[25] Additionally, maps of the established AIA for LAX confirm that no portion of the Specific Plan area is located within established runway protection or inner safety zones for LAX.[26] In their letter evaluating the Specific Plan Update for potential conflicts with the CLUP, the ALUC concluded that "the changes proposed by the Specific Plan Update are of a nature that do not warrant impacts of concern to ALUC."[27]

The Specific Plan area's close proximity to LAX means it is regulated under Code of Federal Regulations (CFR) 14 Part 77 – Safe, Efficient Use, and Preservation of navigable Airspace, which establishes requirements to provide notice to the Federal Aviation Administration (FAA) of certain proposed construction or alteration of structures, and outlines the standards used to determine obstructions to air navigation. However, the Specific Plan does not propose and would not include the development of structures within the Project Site. Additionally, pursuant to the development standards included in the Specific Plan Update, future development within the Specific Plan area would be limited to heights ranging from 30 to 60 feet, which would generally not be expected to encroach into the navigable airspace of LAX.

Based on the above, the Project would not result in safety hazards or excessive noise related to its proximity to LAX. There are no additional public use airports located within 2 miles of the Specific Plan area; the next closest airport to the Specific Plan area is the Hawthorne Airport, located over 4 miles to the east. In addition, development under the Specific Plan does not propose construction of new or relocation or expansion of existing airport facilities that would create new or alter existing AIA boundaries. Accordingly, impacts with regard to airport noise or safety hazards would be less than significant and no mitigation would be required.

Threshold (f): Would the Project Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The El Segundo Emergency Operations Plan (EOP), adopted by the City in 2003, and updated in 2019 establishes policies and structures for City government management of emergencies and disasters. The EOP prescribes four phases of emergencies and disasters: mitigation,

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[24] *Los Angeles County, Airport Land Use Commission, Personal Communication Letter, Subject: Downtown Specific Plan Update, City of El Segundo, signed Bruce Durbin, Supervising Regional Planner, Ordinance Studies/ALUC Section, dated September 26, 2023.*

[25] *Los Angeles World Airports, California State Airport Noise Standards Quarterly Reports and Contour Maps, website: https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/California-state-airport-noise-standards-quarterly-reports-and-contour-maps, accessed November 2, 2023.*

[26] *Los Angeles County, Airport Land Use Commission, Los Angeles International Airport, A-NET Interactive Map, website: https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a. Accessed November 2, 2023.*

[27] *Los Angeles County, Airport Land Use Commission, Personal Communication Letter, Subject: Downtown Specific Plan Update, City of El Segundo, signed Bruce Durbin, Supervising Regional Planner, Ordinance Studies/ALUC Section, dated September 26, 2023.*

preparedness, response, and recovery. The objective of the EOP is to centralize coordination of all necessary personnel and facilities of the City into an organization capable of responding to any emergency.

The EOP is an all-hazard plan and assigns responsibilities for actions and tasks the City will take to help protect the safety and welfare of its citizens against any emergency. Emergency operations for the City of El Segundo are consistent with California's Standardized Emergency Management System (SEMS).

The City of El Segundo has an Emergency Management/Disaster Preparedness team that, among other tasks, creates and maintains emergency plans for the City and coordinates an Emergency Operations Center. The City of El Segundo General Plan includes Safety Elements and Hazardous Material elements which designates policies for safe hazardous material handling, fire prevention procedures, and emergency response. Los Angeles County Department of Public Works has published disaster routes for each city within its jurisdiction.[28] Pacific Coast Highway (formerly Sepulveda Boulevard) is a designated disaster route for the City of El Segundo, which leads to the I-105 evacuation route.

Implementation of the Project would not interfere with the City's adopted EOP because projects proposed pursuant to Specific Plan Update regulations would be reviewed to ensure that new development would not create barriers to evacuation plans. Also, both the Fire Department and Police Department would be involved in any plans to reconfigure existing roads and parking to ensure emergency access needs can be met. Furthermore, as detailed in **Section IV.L, Transportation**, of this EIR, implementation of the Specific Plan Update, including changes associated with the preferred roadway sections, would not alter travel times along typical routes to the most proximate hospital with an emergency room (Centinela Hospital Medical Center in Inglewood) or interfere with emergency access. Therefore, impacts would be less than significant and no mitigation would be required.

Threshold (g): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Specific Plan area, is not located in a Very High Fire Hazard Severity Zone.[29] Future development within the Specific Plan area would not be subject to any more risk than other development in the City not located within a Very High Fire Hazard Severity Zone. Therefore, no impacts would occur, and no mitigation would be required.

[28] *LADPW (Los Angeles Department of Public Works). City of El Segundo Disaster Routes. June 25, 2008.*

[29] *Cal Fire, State Responsibility Area Viewer, website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed: September 1, 2023.*

5. Cumulative Impact Analysis

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. For cumulative analyses, the hazardous materials geographic scope is generally restricted to the area immediately surrounding a project site as the potential for risk is limited to the area immediately surrounding an affected hazardous material site or risk generator. However, other topics associated with human health and safety, such as transportation of hazardous materials, wildfire, or airport safety, can expand through the surrounding region. As detailed in **Table II-1, List of Related Projects,** in **Section II, Environmental Setting**, of this EIR, there are 13 related projects in the City that would cumulatively increase the potential for impacts related to hazards and hazardous materials through the development of residential, office, and various commercial land uses.

As described above, there are a variety or hazardous material and public health and safety issues that are relevant and applicable to the Project. Many potential impacts related to hazardous materials and public health and safety risks would be minimized due to compliance with federal, state, and local regulatory requirements. These legal requirements and regulations are mandatory and are specifically enacted to reduce or eliminate the potential for health and safety risks.

Development of the Project in conjunction with the development of the related projects has the potential to increase the risk for accidental release of hazardous materials. However, as with development under the Project, development of related projects would also require evaluation for potential threats to public safety, including those associated with the accidental release of hazardous materials into the environment during construction and operation, transport/use/disposal of hazardous materials, and hazards to sensitive receptors (including schools). Because hazardous materials and risk of upset conditions are largely site-specific, this would occur on a case-by-case basis for each individual project affected, in conjunction with the development proposals on these properties. In addition, related projects would be required to follow local, State, and federal laws regarding the use, storage, handling, and disposal of hazardous materials. In a manner similar to the Project, adherence to these regulatory requirements would reduce incremental impacts associated with public exposure to health and safety hazards in each of the affected project areas. Because most hazardous-material-related and safety-related risks are localized, generally affecting a specific site and immediately surrounding area, the potential for an impact to combine with another project to create a cumulative impact is minimized. Furthermore, implementation of **MM HAZ-1** would ensure that potential future development under the Project would have less than significant impacts with regard to hazardous materials.

Because construction and operation of related projects would be fully regulated, thereby reducing the potential for public safety risks, cumulative impacts associated with hazards and hazardous materials would be less than significant. Through mitigation and compliance with regulatory requirements, the construction and operation of the Project itself would not create significant human or environmental health and safety risks that could combine with other impacts to create a significant and cumulatively considerable impact. Therefore, cumulative impacts would be less

than significant with mitigation and the Project's contribution would not be cumulatively considerable.

6. Mitigation Measures

MM HAZ-1: The following process shall be followed prior to issuance of a grading permit:

- A Phase I ESA shall be conducted by a qualified environmental professional in accordance with State standards/guidelines and current professional standards, including the ASTM Standard Practice for Environmental Site Assessments.
- If the Phase I ESA identifies a REC and/or if recommended in the Phase I ESA, a Phase II ESA (subsurface investigation) shall be conducted by a qualified environmental professional to determine whether the identified potential sources have resulted in soil, groundwater, or soil vapor contamination exceeding regulatory action levels.
- If the Phase II ESA identifies contamination exceeding regulatory action levels, additional assessment, remediation, or corrective action (e.g., removal of contamination, in-situ treatment, soil capping) shall be conducted under the oversight of State and/or local agency officials (as necessary) and in full compliance with applicable State and federal laws and regulations. If remediation is determined to be necessary, the grading permit shall not be issued until the applicable regulatory agency has indicated that further remedial action is not required by issuing a No Further Action letter or that any remedial action can be implemented in conjunction with excavation and/or grading.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to hazards and hazardous material would be significant. However, with the incorporation of **MM HAZ-1** construction-related impacts to hazards and hazardous material would be reduced to a level of less-than-significant. Therefore, Project-level and cumulative operational impacts with regard to hazards and hazardous material would be less than significant with mitigation.

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forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed: September 1, 2023.

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IV. Environmental Impact Analysis

H. Land Use and Planning

1. Introduction

This section describes the existing land use and planning conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on review of local, regional, and statewide policies and regulations encompassing the Project Site, including the Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Strategy Plan (RTP/SCS; Connect SoCal), the City of El Segundo General Plan, and the City of El Segundo Municipal Code (ESMC). Other sources consulted are listed in **Section IV.H.8, References**, below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Citywide Conditions

The City of El Segundo (City) is generally characterized as an urbanized and built-out community within Los Angeles County in southern California. The City is unique in that it has very distinct and identifiable areas: residential base, Downtown, Chevron Refinery, and the portion of the City east of Pacific Coast Highway with a combination of industrial, office, and commercial uses. The northwestern portion of the City contains a mixture of single-family, two-family, and multi-family residential; a majority of the residential area is in single-family use. Near the residential area is Downtown, which includes the Civic Center and provides a focal point for the City. In this general vicinity, just to the south and west of the Project Site, is an industrial area that includes the Smoky Hollow Specific Plan. This area contains mostly older industrial buildings of one or two stories. The area of the City south of El Segundo Boulevard and west of Pacific Coast Highway (PCH) is taken up mostly by the Chevron Refinery. The Refinery occupies approximately one-third of the City. The portion of the City east of PCH is a combination of industrial, office, and commercial uses. This area contains the "super block" development, a mixture of office and research and development uses, as well as the U.S. Air Force Base. According to the City's General Plan Land Use Element, one of the residential trends includes increased multi-family development and

reduced single-family development. This trend is likely going to continue under existing designations, increasing the City's density.[1]

b) Existing Project Site Conditions

The El Segundo Downtown Specific Plan Update area (Project area) is in Downtown El Segundo, in the northwest quadrant of the City of El Segundo. The Specific Plan area is approximately 43.8 acres in size. The Project area is irregular in shape with portions extending to Eucalyptus Drive to the east, El Segundo Boulevard to the south, Concord Street to the west, and Mariposa Avenue to the north.

The Downtown remains a small, distinct area within El Segundo and most of the Specific Plan area includes a range of neighborhood serving commercial uses including retail, restaurants, offices, and banks; and there are some existing civic uses and residential units. Existing development within the Specific Plan area ranges from one- to three-story buildings, with many buildings located along or near the front property line at one to two-story heights and a few three-story buildings. The Specific Plan area is generally gently sloping with some steeper topography along portions Main Street and the Marketplace Alley.

The Specific Plan area is divided by two principal streets running in a north-south orientation, Main Street and Richmond Street, and contains portions of lesser traveled Standard Street and Concord Street. Two major streets cross in an east-west orientation, Grand Avenue and El Segundo Boulevard, as do sections of four smaller streets: Franklin Avenue, Holly Avenue, Pine Avenue, and Mariposa Avenue. Main Street, Grand Avenue, and El Segundo Boulevard each connect to major, regional arterials or freeways. Main Street runs between El Segundo Boulevard and Imperial Highway, which borders Los Angeles International Airport. El Segundo Boulevard, on the southern boundary of the Specific Plan area, connects to Pacific Coast Highway and the I-405 Freeway. Grand Avenue links to Pacific Coast Highway to the east and the coastline to the west. The Project area location is shown in **Figure II-1, Regional Location Map**, included in **Section II. Environmental Setting**, of this Draft EIR.

Figure III-2, Existing Land Use Designations, and **Figure III-3, Existing Zoning**, included in **Section III, Project Description**, of this Draft EIR, show the Project Site's current general plan designations and zoning, respectively. As shown in **Figure III-2**, the City's General Plan designates the Downtown area as Downtown Commercial (8.4 acres) and Downtown Specific Plan (26.3 acres), where existing uses are already of a community-serving nature. According to the City's General Plan, the Downtown Commercial designation permits community serving retail, community serving office, and residential on the floor above street level only if commercial is on the street level, at a maximum floor area ratio (FAR) of 1.0. Residential uses are limited to a maximum density of 10 dwelling units per acre.[2] As shown in **Figure III-3**, the zoning for the

[1] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

[2] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

Specific Plan area is Downtown Specific Plan (DSP) and Downtown Commercial (C-RS), which corresponds to the General Plan land use designations.

c) Surrounding Land Uses

The City contains a diverse mix of land uses, including a mixture of single- and multi-family residential neighborhoods, corporate office campuses, and both light and heavy industrial land uses, including the Chevron El Segundo oil refinery. The Chevron Refinery occupies approximately one-third of the City and is adjacent to the beach, along with other industrial land uses. The Specific Plan area is surrounded by a variety of land uses, including residential, recreational, and commercial retail uses:

- **Land Uses to the North**: Land uses to the north include El Segundo High School campus, El Segundo Library, and Library Park located on Main Street. Neighborhoods surrounding these civic uses are comprised mainly of single-family dwellings, duplexes, and apartment complexes. Public Facilities (P-F) Zone and Open Space (O-S) Zone are located adjacent to the Project Site.

- **Land Uses to the East**: Neighborhoods to the east are comprised of a mix of single-family dwellings, duplexes, and apartment complexes. Areas southeast of the Project area contain the Smoky Hollow Specific Plan area and are developed with light industrial and office uses. El Segundo Recreation Park, located along Pine Avenue and Eucalyptus Drive, provides recreational facilities for a range of sports, including softball, roller hockey, tennis, and basketball. Properties to the east of the Project Site are zoned Two-Family Residential (R-2), Parking (P), Multi-Family Residential (R-3), Neighborhood Commercial (C-2), and Smokey Hollow West Specific Plan (SHW).

- **Land Uses to the South**: The Chevron Refinery is south of El Segundo Boulevard. The Chevron Refinery is zoned Heavy Industrial (M-2) and covers over 1,000 acres of land.

- **Land Uses to the West**: Less than a mile from the western edge of the Specific Plan is the Pacific Ocean. The neighborhoods between Downtown El Segundo and the coast are comprised mainly of single-family dwellings, duplexes, and apartment complexes. Land uses to west are zoned as Neighborhood Commercial (C-2) along Grand Avenue, Multi-Family Residential (R-3), and Two-Family Residential (R-2).

3. Relevant Plans, Policies, and Ordinances

a) Federal

There are no federal plans, policies, or ordinances applicable to the land use considerations of the Project.

b) State

(1) Government Code Sections 65450 through 65457

Pursuant to Government Code Section 65450, a Specific Plan must include text and a diagram or diagrams, which specify all of the following in detail:

- The distribution, location, and extent of the uses of land, including open space within the area covered by the plan.
- The proposed distribution, location, extent, and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy and other essential facilities proposed to be located within the land area covered by the plan and needed to support the land uses described in the plan.
- Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.
- A program of implementation measures including regulations, programs, public works projects and financing measures necessary to carry out the above items.
- A discussion of the relationship of the Specific Plan to the General Plan.

(2) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of greenhouse gas (GHG) emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPO) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

c) Regional and Local

(1) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

(RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016-2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTA's)[3] by six percent and the share of new job growth in HQTAs by 15 percent.

(2) Regional Housing Needs Assessment

In accordance with Government Code Section 65584, projected housing needs for each city and county in the Southern California region are prepared by SCAG under a process known as the Regional Housing Needs Assessment (RHNA). RHNA allocates regional housing needs by income level among member jurisdictions.

California law established the planning period for the current RHNA from June 30, 2021, to October 15, 2029. SCAG's allocation for El Segundo is 492 units. The 492 housing units for El Segundo are out of the anticipated total regional construction need of 1,341,928 units (812,060 of which are in Los Angeles County).[4] See **Section IV.J, Population and Housing**, of this Draft EIR for more discussion.

At the time of drafting this EIR, the City of El Segundo, among all other jurisdictions within the SCAG region are required to update their respective Housing Elements to accommodate the 6th cycle of RHNA, which covers the planning period of October 2021 through October 2029. The California Department of Housing and Community Development provided SCAG a final regional determination of 492 units for the 6th cycle RHNA, including 189 very

[3] *HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.*

[4] *City of El Segundo. City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed August 2023.*

low income and 88 low income units. However, the 2014-2021 had a shortfall, which requires the City to accommodate an additional 18 very low income and 11 low income units, for a total of 521 units.

(3) City of El Segundo General Plan

The City of El Segundo adopted its General Plan on December 1, 1992. A General Plan is intended to provide direction for future development of the City. It represents a formal expression of community goals and desires, provides guidelines for decision making about the City's development, and fulfills the requirements of California Government Code Section 65302 requiring local preparation and adoption of General Plans. The General Plan should be viewed as a dynamic guideline to be refined as the physical environment of the City's changes. The City of El Segundo General Plan (General Plan) includes the following mandated and optional elements, applicable to the proposed Project: Land Use Element, Circulation Element, Economic Development Element, Housing Element, Open Space and Recreation Element, Conservation Element, Air Quality Element, Noise Element, Public Safety Element. According to the Land Use Element, buildout projections for the 1992 General Plan analyzed existing trends until 2010.

(a) Land Use Element

The Land Use Element is a required element of the General Plan, specified in Government Code Section 65302(a). El Segundo's Land Use Element has the broadest scope of all the General Plan elements. It is intended to portray the future direction of the City, the way the community would like to see it. The Land Use Element is a guide for the future, as stated in the goals, objectives, policies, and program statements. By state law, the City's other ordinances and plans, for example the Zoning Ordinance, must be consistent with the General Plan, and therefore with the Land Use Element. The Land Use goals and policies will influence the character of the City more than any other single element of the General Plan.[5]

(b) Circulation Element

The purpose of the Circulation Element is to assist the City in providing a safe, convenient, and efficient circulation system. State law requires that a circulation element be incorporated into the General Plan. The Circulation Element identifies a system capable of responding to growth occurring consistent with the policies and Land Use Plan presented in the Land Use Element. The Circulation Element identifies physical improvements that will be needed to attain the Circulation goals and objectives, as well as alternative techniques to improve the City's circulation system. The circulation system is one of the most important of all urban systems in determining the form and quality of the El Segundo environment. The circulation modes used, location of routes, operational policies and the operating levels of service influence the nature of urban

[5] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

development, the physical organization of the City, and can enhance or limit the social and economic activity within the City.[6]

(c) Economic Development Element

The Economic Development Element is concerned with the economic health of the commercial and industrial uses of the City. It focuses on the expansion and maintenance of El Segundo's economic base and on the enhancement of the City's business climate. Economic development goals and policies direct City activities toward maximizing the City's economic development potential. The Economic Development Element is an optional element in El Segundo's General Plan. Government Code Section 65303 enables cities to adopt optional general plan elements. El Segundo elected to include an Economic Development Element because it focuses on issues significant to El Segundo's future that are not addressed elsewhere.[7]

(d) Housing Element

The Housing Element is one of the seven required General Plan elements mandated by state law. State law requires that each jurisdiction's Housing Element consist of "identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled program actions for the preservation, improvement and development of housing." The Housing Element must analyze and plan for housing for all segments of the community.[8]

This Housing Element covers the Planning Period from October 2021 through October 2029, consistent with the state-mandated update required for all jurisdictions within the SCAG region. The Housing Element of the City's General Plan for the 2021-2029 cycle was adopted by the City Council in November 2022. See **Section IV.J, Population and Housing**, of this Draft EIR for more discussion.

(e) Open Space and Recreation Element

Section 65302(e) of the California Government Code requires the adoption of an open space element as part of the general plan. The City of El Segundo is primarily an industrial and suburban residential environment with little undeveloped land. As such, the City's major open space and recreation resources are public parks and recreational facilities. There is a common community belief that these resources need to be protected, and whenever possible, created for recreation,

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[6] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan . Accessed August 2023.*

[7] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

[8] *City of El Segundo. City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed August 2023.*

beautification, and maintenance of the small town atmosphere and quality of life in the community.[9]

(f) Conservation Element

California Government Code Section 65302(d) provides that the general plan shall include a conservation element for the conservation, development, and utilization of natural resources. To the extent applicable, the following issues must be addressed … water and hydrology, forests, soils, rivers and other waters, harbors and fisheries, wildlife, minerals, and other natural resources. The Existing Conditions Report, of the Conservation Element, outlines a four relevant conservation issues for the City of El Segundo: coastal resources, water resources, biotic resources, and mineral resources. The Conservation Element includes programs and policies to promote community-wide conservation, and requires new development to incorporate sound conservation principles and mitigate any negative environmental impacts consequent to development within or bearing upon the City.[10]

(g) Air Quality Element

While air quality is not a required element, it was included as a suggested topic for conservation and circulation elements in the 1991 State General Plan Guidelines. Thus, the Air Quality Element was prepared as a new element as part of the 1992 General Plan. The City of El Segundo prepared the Air Quality Element to (1) address the problems of maximum air pollution levels, (2) reduce the health and economic impacts of air pollution, (3) comply with the requirements of the 1991 Air Quality Management Plan (AQMP) for the South Coast Air Basin (SCAB), (4) determine the best means of addressing the AQMP measures for local government, and (5) increase awareness of local community and governmental responsibility for air quality.[11]

(h) Noise Element

The State of California has mandated, through Title 7, Chapter 3, Article 5, of the California Administrative Code, the requirement that city and county governments adopt a general plan. Government Code Section 65302(f) requires that the general plan contain a noise element that "identifies and appraises noise problems in the community." In developing a noise element, the community is to recognize the guidelines adopted by the Office of Noise Control in the State Department of Health Services. The Noise Element is intended to be used as a guide in public and private development matters related to outdoor noise. The Noise Element will serve as an

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[9] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

[10] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

[11] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

aid in defining acceptable land uses and as a guideline for compliance with California Noise Insulation Standards.[12]

(i) Public Safety Element

The Public Safety Element addresses hazards associated with geology and seismicity, flooding, fire, petroleum storage, and hazardous materials. The purpose of the Public Safety Element is to reduce death, injuries, property damage, and economic and social dislocation resulting from natural and human-caused hazards such as urban fire, flooding, mudslides, earthquakes, and hazardous incidents.[13]

(j) Hazardous Materials and Waste Management Element

The City of El Segundo has adopted multiple goals associated with hazardous material and waste management in order to assist in meeting state, federal, and county goals. The City's General Plan was created in conformance with the Los Angeles County Hazardous Waste Management Plan.

(4) City of El Segundo Municipal Code

(a) Title 15, Zoning Regulations

Title 15 of the El Segundo Municipal Code (ESMC) includes regulations concerning where and under what conditions various land uses may occur in the City. It also establishes zone-specific height limits, setback requirements, parking ratios, and other development standards, for residential, commercial, industrial, and all other types of sites. The Zoning Code is a primary tool for implementing the City's General Plan. The purpose of the Zoning Code is to encourage, classify, designate, regulate, and restrict the highest and best locations and uses of buildings and structures, for residential, commercial, and industrial or other purposes.

(5) Proposed Specific Plan

(a) Land Use and Development Standards

The Specific Plan uses a district-based approach to govern land uses and development standards. The Land Use and Development Standards chapter would set forth general provisions for development within the Specific Plan area and detail the permitted land uses and development standards that are customized for each district. The regulations within the chapter would guide growth and development in the Specific Plan area to accommodate a desired mix of uses with

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[12] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

[13] *City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.*

guidelines and standards included to create a development form and composition that supports a vibrant, active Downtown shopping district and neighborhood.

(i) Main Street District

The Specific Plan Update vision for the Main Street District is centered on maintaining the historic small-town character of the area by creating a pedestrian-friendly environment with outdoor dining while allowing residential and office uses above or behind Main Street retail. As shown in **Section III, Project Description, Table III-2, Development Standards for Main Street District**, the site development standards would ensure intentional site planning and design.

(ii) Richmond Street District

The Specific Plan Update vision for the Richmond Street District is centered on fostering an eclectic mixed-use environment that enhances the existing "old town" character of the area by upgrading street furnishings, landscaping, and amenities and placing professional office, real estate, and residential uses at the street edge. As shown in **Section III, Project Description, Table III-3, Development Standards for Richmond Street District**, the site development standards would ensure intentional site planning and design.

(iii) Grand Avenue District

The Specific Plan Update vision for the Grand Avenue District is centered on supporting a vibrant Downtown by adding residential and office uses permitted in at higher densities and located in the ground floors. As shown in **Section III, Project Description, Table III-4, Development Standards for Grand Avenue District**, the following site development standards would ensure intentional site planning and design.

(iv) Civic Center District

The Specific Plan Update vision for the Civic Center District is centered on redesigning gathering spaces for outdoor entertainment and events by reducing lawn areas and adding public uses and activities. As shown in **Section III, Project Description, Table III-5, Development Standards for Civic Center District**, the following site development standards would ensure intentional site planning and design.

(b) Administration

The land use and development standards presented in detail in **Section III, Project Description**, **Tables III-2** through **III-5**, would be regulated, administered, and enforced by the City in accordance with the with the ESMC. The Specific Plan takes precedence over other regulations and ordinances of the City within the Specific Plan boundaries. However, if the Specific Plan is silent on a topic, the ESMC requirements remain in effect.

Major modifications to the Specific Plan may need to be revised over time to accommodate modifications in response to the community's needs or changing economic conditions. In accordance with the Government Code Sections 65453-65454 and ESMC Chapter 15-27,

amendments to the Specific Plan may be proposed as long as the proposed amendments are compatible and consistent with the purpose and goals of the Specific Plan and the General Plan. The Director of Community Development may make minor text and exhibit modifications that are clerical in nature with no substantive impact/change without an amendment.

The development of a Project that is in conformance with the Specific Plan shall undergo a Design Review Process by filing a Downtown Design Review (DDR) application with the Community Development Department that will be reviewed by the Planning Commission. The developer and/or property owner for the Specific Plan area is responsible for all transportation and utility improvements as required by the Specific Plan, and is responsible for financing the Project.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to land use and planning are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to land use and planning would occur if the Project would:

Threshold (a): ***Physically divide an established community; and***

Threshold (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.***

b) Analysis of Project Impacts

Threshold (a): Would the Project physically divide an established community?

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area.

As discussed in detail in **Section III. Project Description**, of this Draft EIR, the Project is an update to the adopted El Segundo Downtown Specific Plan, which serves as land use and zoning for properties within the boundaries of the Specific Plan area. The Project would include direction for public improvement and streetscape guidelines, private urban form criteria, a list of permitted and conditionally permitted land uses in each district within the Specific Plan area, development standards, mobility and infrastructure improvements, an implementation plan, and administration processes.

Specifically, in addition to land use and zoning changes, the Project would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond

Street, and Grand Avenue, which would create potential changes to the number of travel lanes on those streets. The Project would potentially relocate a portion of an existing truck route that is located on Main Street between El Segundo Boulevard and Grand Avenue (pending a future Truck Route Study). The Project also proposes the potential permanent closure of a portion of Richmond Street to vehicles, generally from Franklin Avenue to Grand Avenue, to create a permanent pedestrian only street for outdoor dining and gathering; and recommends maintaining the existing Class III bike route "sharrows" and/or upgrading them to Class II bike lanes. The Project would include pedestrian and transit improvements in the Project area including widened sidewalks and expanded outdoor seating and dining areas for area restaurants. Transit improvements could include bus stop enhancements such as additional transit shelters, lighting, and furnishings, and potentially provide expanded bus zones. The Project would include modifications to parking standards and strategies and alternatives for on-street parking and potentially provide two new parking structures at the northwest corner of Grand Avenue and Standard Street and the northeast corner of Richmond Street and Franklin Avenue.

Plan improvements would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area.

Because the Specific Plan proposed street network changes and parking improvements would not physically divide an established community, no impacts associated with implementation of the Project would occur and no mitigation would be required.

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

To evaluate the Project's impacts related to land use and planning, this analysis examines the Project's consistency with both regional and local plans, policies, and regulations that regulate land uses within the Project Site's vicinity. These plans are as follows:

- SCAG's Connect SoCal (2020–2045 RTP/SCS)
- City of El Segundo General Plan
- City of El Segundo Municipal Code

(1) Consistency with the Regional Transportation Plan/Sustainable Communities Strategy

The Project's consistency with 2020–2045 RTP/SCS Goals, as discussed in **Section IV.F, Greenhouse Gas Emissions,** of this Draft EIR, demonstrates that the Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential

units. As discussed in **Section IV.J, Population and Housing**, of this Draft EIR, the Project would be expected to generate 1,057 full- and part-time jobs and 732 residents. In addition, public transit operates in the vicinity of the Specific Plan area and includes Beach Cities Line 109, provides local service between the City of Redondo Beach and LAX and runs along Main Street. The Project would bring residential development to nearby major employers, including LAX, energy/gas/oil and aerospace companies and near the City's "super block" development, which contains a mixture of office and research and development uses, thereby reducing travel demands by developing a mix of residential housing opportunities in proximity to employment centers. For these reasons, and as shown in **Section IV.F, Greenhouse Gas Emissions,** of this Draft EIR, the Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

(2) Consistency with the City of El Segundo General Plan

A review of the General Plan shows that the Specific Plan is compatible and consistent with the goals and policies outlined in the General Plan. The Specific Plan was prepared to provide the essential relationship between the policies of the General Plan and actual development of the Specific Plan area. By functioning as a regulatory document, the El Segundo Downtown Specific Plan update provides a means of implementing the City's General Plan. All future development plans and entitlements within the Specific Plan boundaries must be consistent with the standards set forth in the Specific Plan. See "Proposed Specific Plan" in Section 3.C.5. Relevant Plans, Policies, and Ordinances, for a further discussion on development standards and administrative authorities of the Specific Plan.

Table IV.H-1, Consistency with the Applicable Goals, Objectives, and Policies of the General Plan, outlines the applicable goals, objectives and policies identified in the General Plan and the proposed Specific Plan's consistency with each of them. As shown below, the Specific Plan would be consistent with applicable goals, objectives, and policies of the General Plan. For those General Plan goals and policies that do not specifically pertain to the Specific Plan, the Specific Plan would not impede the City's ability to meet those goals and policies.

Table IV.H-1
Consistency with the Applicable Goals, Objectives, and Policies of the General Plan

Policy	Project Consistency
Land Use Element	
Goal LU1: Maintain El Segundo's "small town" atmosphere, and provide an attractive place to live and work.	**Consistent.** The Specific Plan Update includes design guidelines and development standards for the purpose of providing an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together; and thus, providing an attractive place to live and work. The Specific Plan Update would include amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels from Downtown Commercial to Downtown Specific Plan, and amend the City's zoning map to change zoning on eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP), which would allow for land uses that encourage reinvestment and

Table IV.H-1
Consistency with the Applicable Goals, Objectives, and Policies of the General Plan

Policy	Project Consistency
	revitalization of each Downtown District and to create allowable densities that are high enough to facilitate market-driven redevelopment and would allow for the flexibility to develop desirable land uses. The Project would not encroach into existing single-family neighborhoods, alter any residential land uses, or otherwise disrupt the existing community's atmosphere. The Project seeks to create new housing opportunities within the area through the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units within the Specific Plan area. Permitted uses within the Specific Plan area would create both housing and job opportunities for the residential and business community. The new commercial uses (restaurant, retail and office) allowed by the Specific Plan would create a synergy with the existing hotels, the new multi-family residential uses, and other existing commercial and industrial uses in the surrounding area. The commercial uses would provide needed amenities for the residents of the multi-family residential uses and the multi-family residential uses would support the growth of the surrounding commercial businesses. Furthermore, the Project seeks to develop the Civic Center area as a focal point. This would be achieved through direction for streetscape beautification, creating outdoor gathering spaces, improving mobility, and including other enhancements that establish a unique and inviting environment to live and work.
Objective LU1-1: Preserve and maintain the City's low-medium density residential nature, with low building height profile and character, and minimum development standards.	**Consistent.** As previously addressed under Goal LU1, the purpose of the amendments in zoning for the Specific Plan area is a) to create allowable densities that are high enough to facilitate market-driven redevelopment and b) allow flexibility to develop desirable land uses. The Project would preserve and maintain the City's low medium-density nature in residentially zoned areas. The Specific Plan Update describes the development standards for lot area, height, setbacks, lot frontage, building area, floor area, walls and fences, and accessory structures.
Objective LU1-2: Prevent deterioration and blight throughout the City.	**Consistent**. The vision of the Project is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together; thereby preventing deterioration of the Downtown area. Furthermore, the new land use regulations and development standards in the Specific Plan will facilitate redevelopment and investment in existing properties, thereby preventing deterioration.
Policy LU1-2.2: Prevent deterioration and	**Consistent.** By updating the Specific Plan, the Project

Table IV.H-1
Consistency with the Applicable Goals, Objectives, and Policies of the General Plan

Policy	Project Consistency
blight; properties should be maintained at all times in accordance with City of El Segundo codes.	area would be transformed into an attractive area and the potential for blight in the Downtown area and surrounding would be minimized. Furthermore, the proposed the Specific Plan update provides direction for streetscape beautification, outdoor gathering spaces, improved mobility, and other enhancements that establish a unique and inviting environment highlighting its historical and cultural roots to enrich this community destination; thereby providing assurance that landscape and facilities would be of high quality and well-maintained.
Objective LU1-3: Allow for the continued operation and orderly conversion of existing uses as they change to conform with the new land use designations.	**Consistent.** The Project would revise existing Specific Plan planning districts, amend General Plan and zoning designations on eight parcels, and include mobility enhancements. These changes would create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together. The Project would not disrupt the existing community's atmosphere.
Objective LU1-4: Preserve and maintain the City's Downtown and historic areas as integral to the City's appearance and function.	**Consistent.** The vision of this Specific Plan Update is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together and establishing a unique and inviting environment highlighting its historical and cultural roots to enrich this community destination. Furthermore, as outlined in the Specific Plan Update, Chapter 2, Section H.3., the City has policies and discretionary review requirements to ensure historic resource preservation in the Specific Plan area.
Goal LU3: Promote the health, safety, and wellbeing of the people of El Segundo by adopting standards for the proper balance, relationship, and distribution of the residential land uses.	**Consistent.** The Specific Plan Update includes land use designations which would allow for a mix of residential and commercial uses in the Project area. Implementation of the Project would continue to promote standards for the proper balance, relationship, and distribution of residential land uses. The idea behind the Specific Plan Update is to create allowable densities that are high enough to facilitate market-driven redevelopment and would allow for the flexibility to develop desirable land uses.
Objective LU3-2: Preserve and maintain the City's low-medium density residential nature, with low building height profile and character, and minimum development standards.	**Consistent.** An objective of the Specific Plan Update is to promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing, thus maintaining a "small town" through low building height profiles.
Policy LU3-2.1: Promote construction of high quality Multi-Family Residential developments	**Consistent.** Future development within the Specific Plan area would be consistent with the design

Table IV.H-1
Consistency with the Applicable Goals, Objectives, and Policies of the General Plan

Policy	Project Consistency
with ample open space, leisure and recreational facilities.	standards and guidelines that promote high-quality residential and commercial development design and ensure functional pedestrian, bicycle, and motor vehicle circulation within the Project area. In addition, common recreation facilities and private outdoor space are required for multiple-family residential uses in the Main Street, Richmond Street, and Grand Avenue land use districts of the Specific Plan Update.
Policy LU3-2.2: Multi-family developments will be located only in appropriate places and evaluated carefully to insure that these developments are not detrimental to the existing single-family character.	**Consistent.** The Specific Plan Update includes amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels from Downtown Commercial to Downtown Specific Plan. As such, the amendments to the General Plan would not be detrimental to the existing single-family character by not developing non-single family uses within such a land-use designation. In addition, the Project would preserve and maintain the City's low and medium-density nature in residentially zoned areas.
Policy LU3-2.3: Appropriate buffers such as walls, landscaping, or open space, shall be provided between residential and non-residential uses.	**Consistent.** Future development in the Specific Plan area would incorporate landscaped areas around the perimeter of the buildings, and within the required setbacks. As discussed in **Section III, Project Description**, of this Draft EIR, the development standards for the Specific Plan Update include landscaping standards to ensure adequate landscaping area and permanent maintenance for the Specific Plan area. To achieve a cohesive appearance and maintain the urban landscape, joint participation between private property owners and the City would be required.
Policy LU3-2.4: Low density areas shall be preserved and zone changes to higher density shall be carefully investigated for compatibility to existing uses.	**Consistent.** The idea behind the amendments in zoning in the Specific Plan Update is to create allowable densities that are high enough to facilitate market-driven redevelopment and would allow for the flexibility to develop desirable land uses. The vision of this Specific Plan Update is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together.
Policy LU3-3.2: Establish guidelines for new Multi-Family Residential development to ensure they maintain the existing scale and character of the neighborhood.	**Consistent.** The idea behind the amendments in zoning in the Specific Plan Update is to create allowable densities that are high enough to facilitate market-driven redevelopment and would allow for the flexibility to develop desirable land uses. The vision of this Specific Plan Update is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together. The Specific Plan Update describes the development standards for lot area, height, setbacks, lot frontage, building area, floor area, walls and fences, and accessory structures.

Table IV.H-1
Consistency with the Applicable Goals, Objectives, and Policies of the General Plan

Policy	Project Consistency
Goal LU4: Provide a stable tax base for the City through development of new commercial uses, primarily within a mixed-use environment, without adversely affecting the viability of Downtown.	**Consistent.** The Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, and 24,000 square feet of medical office uses. The addition of commercial business would provide fiscal benefits to the City's general fund by way of increased employment, utility, business license, property, and other tax revenues. Furthermore, the multi-family residential uses would support the growth of the surrounding commercial businesses.
Objective LU4-1: Promote the development of high quality retail facilities in proximity to major employment centers.	**Consistent.** The Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, and 24,000 square feet of medical office uses. The Project area is currently developed with a wide range of commercial and public uses and any development in the Specific Plan area would enhance the choice of high quality retail opportunities for the City of El Segundo and the surrounding communities. Therefore, the incorporation of new retail in the Project area would align with the City's objective to promote retail within the proximity of major employment centers.
Policy LU4-1.1: Require landscaping, its maintenance, and permanent upkeep on all new commercial developments.	**Consistent.** Future development in the Specific Plan area would incorporate landscaped areas around the perimeter of the buildings, and within the required setbacks. As discussed in **Section III, Project Description**, of this Draft EIR, the development standards for the Specific Plan Update include landscaping standards to ensure adequate landscaping area and permanent maintenance for the Specific Plan area. To achieve a cohesive appearance and maintain the urban landscape, joint participation between private property owners and the City would be required.
Policy LU4-1.2: All commercial facilities shall be built and maintained in accordance with Health and Safety Code requirements and shall meet seismic safety regulations and environmental regulations.	**Consistent.** Implementation of the Project would be built and maintained in accordance with health and safety requirements through the required compliance with the ESMC, the Downtown Specific Plan, and ensured by the building permit approval process. As further described in **Section IV.E, Geology and Soils**, of this Draft EIR, Project construction would be completed in accordance with the California Building Code (CBC). As with all development within the City, development within future project sites would be required to comply with the seismic safety requirements of the CBC. The CBC provides procedures for earthquake resistant structural design that includes considerations for onsite soil conditions, occupancy, and the configuration of the structure, including the structural system and height.
Policy LU4-1.3: Residential areas adjoining commercial developments shall be adequately	**Consistent.** Future development in the Specific Plan area would incorporate landscaped areas around the

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buffered by landscaping, berms, screening, or open space. Height limits shall be established in all commercial zones to protect the privacy and solar access of adjacent residential uses.	perimeter of the buildings, and within the required setbacks. As discussed in **Section III, Project Description**, of this Draft EIR, the development standards for the Specific Plan Update include landscaping standards to ensure adequate landscaping area and permanent maintenance for the Specific Plan area. The Specific Plan Update describes the development standards for lot area, height, setbacks, lot frontage, building area, floor area, walls and fences, and accessory structures.
Policy LU4-1.4: New commercial developments shall meet seismic safety standards and regulations, as well as comply with all noise, air quality, water, and environmental regulations.	**Consistent.** As previously stated, future development within the Project area would be required to comply with the seismic safety requirements of the CBC. As further described in **Section IV.I, Noise**, of this Draft EIR, future development would require mitigation measures during construction to ensure noise levels do not exceed the City's hourly threshold of 65 dBA Leq at the nearest residential properties. Once operational, the future development would be in compliance with the City's noise ordinance. With regards to air quality, future development would be constructed as not to exceed the South Coast Air Quality Management District's (SCAQMD) significance thresholds for volatile organic compounds (VOC), nitrous oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), coarse particulate matter (PM_{10}), or fine particulate matter ($PM_{2.5}$) during construction in all construction years. Further, future development design, construction, and operation would be completed consistent with the Enhanced Watershed Management Program and in accordance with the ESMC-mandated City Stormwater and Urban Runoff Pollution Control Ordinance, Municipal National Pollutants Discharge Elimination System (NPDES) Permit, and the City's Low Impact Development (LID) Manual, with the goal of reducing the amount of pollutants in stormwater and urban runoff. Implementation of future development would be built and maintained in accordance with seismic safety, noise, air quality, water, and environmental standards and regulations through the required compliance with the ESMC, ensured by the building permit approval process.
Objective LU4-2: Create an integrated, complimentary, attractive multi-use Downtown to serve as the focal point for the civic, business, educational, and social environment of the community.	**Consistent.** The vision of this Specific Plan Update is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together. The Project's goal is to create a balance of uses within the Downtown to reach its optimal potential.
Policy LU4-2.1: Revitalize and upgrade commercial areas, making them a part of a viable, attractive, and people-oriented commercial district. Consideration should be	**Consistent.** An objective of the Specific Plan Update is to promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to

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Policy	Project Consistency
given to aesthetic architectural improvements, zoning, and shopper amenities.	reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing. The design guidelines described in the Specific Plan Update establish criteria that enhance the coordination, organization, function and identity of the Project area, while maintaining a compatible relationship with the surrounding development.
Policy LU4-2.3: Utilize public spaces for Downtown activities and special events.	**Consistent.** The Project's goal is to create a balance of uses within the Downtown to reach its optimal potential and to provide direction for streetscape beautification, outdoor gathering spaces, improved mobility, and other enhancements that establish a unique and inviting environment highlighting its historical and cultural roots to enrich this community destination. As outlined in the Specific Plan Update, Chapter 2, Section G.5., the Specific Plan area has three areas within the Civic Center District that with redesign have potential to be vibrant community plaza spaces. The Specific Plan Update sets specific standards intended to improve the public plazas and facilitate more public gathering and events in those locations.
Policy LU4-2.4: The City shall commit to maintaining and upgrading where necessary the public areas Downtown.	**Consistent.** The Project would include public improvements and streetscape guidelines and mobility and infrastructure improvements throughout the Specific Plan area. In addition, the Specific Plan Update suggests public art in the following locations: key intersections and entries; accent focal points in alleyways, paseos, and plazas; and primary bus shelters, parklets, and major bicycle parking areas. As outlined in the Specific Plan Update, Chapter 2, Section G.5., the Specific Plan area has three areas within the Civic Center District that with redesign have potential to be vibrant community plaza spaces. The Specific Plan Update sets specific standards intended to improve the public plazas and facilitate more public gathering and events in those locations.
Policy LU4-2.5: The Downtown area will provide adequate parking, through both public and private efforts, to meet demand.	**Consistent.** The Specific Plan Update envisions strategies to optimize parking supply and demand in the Downtown area including implementation of shared-parking programs, development of informational programs for drivers to direct parkers quickly, incorporation of enhanced wayfinding signage for the existing public parking structure at the corner of Richmond Street and Grand Avenue, and installation of dynamic "spaces available" sign system. Additionally, the Specific Plan would allow for two new parking structures: one at the northeast corner of Richmond Street and Franklin Avenue and another at the northwest corner of Grand Avenue and Standard

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Policy	Project Consistency
	Street.
Policy LU4-2.6: The Downtown area shall maintain and encourage low-scale architectural profile and pedestrian-oriented features, consistent with existing structures.	**Consistent.** Existing development within the Specific Plan area ranges from one- to three-story buildings, with many buildings located along or near the front property line at one to two-story heights and a few three-story buildings. This low-scale architectural profile would be maintained within the Specific Plan Update. Furthermore, Specific Plan Update would change the predominant auto-oriented character of the area to a pedestrian-oriented Downtown, and would create an easily identifiable and distinctive sense of place in the Downtown core through distinctive design treatments and pedestrian amenities.
Objective LU4-3: Provide for new office and research and development uses.	**Consistent**. The Specific Plan Update would allow the addition of up to 200,000 square feet of general office uses and 24,000 square feet of medical office uses.
Policy LU4-3.6: Require landscaping, its maintenance, and permanent upkeep in all new office and mixed-use developments.	**Consistent.** Future development in the Project area would provide landscaping in accordance with the Specific Plan Update and ESMC requirements. In addition, to achieve a cohesive appearance and maintain the urban landscape, as outlined in the Specific Plan Update, Chapter 4, Section E.2., joint participation between private property owners and the City would be required.
Objective LU4-4: Provide areas where development has the flexibility to mix uses, in an effort to provide synergistic relationships which have the potential to maximize economic benefit, reduce traffic impacts, and encourage pedestrian environments.	**Consistent.** The vision of this Specific Plan Update is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together. The Project's goal is to create a balance of uses within the Downtown to reach its optimal potential.
Policy LU7-1.2: No new development shall be allowed unless adequate public facilities are in place or provided for.	**Consistent.** The construction and operation of future development in the Project area would require the payment of development impact fees which would serve to reduce impacts to public facilities and services. Thus, the Project would have less than significant impacts to public facilities within the City, and adequate public facilities would be provided. See **Section IV.K, Public Services**, of this Draft EIR, for more discussion.
Policy LU7-2.3: All new development shall place utilities underground.	**Consistent.** Future development in the Project area would require upgrades to utility infrastructure. All infrastructure would be constructed in accordance with the standards of the applicable governing agency. Utilities and service systems include water, sewer, storm drain, natural gas, electricity, and telecommunications, all of which would be installed underground. See **Section IV.N, Utilities and Service Systems**, of this Draft EIR, for further discussion.

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Policy	Project Consistency
Circulation Element	
Goal C1: Provide a safe, convenient, and cost-effective circulation system to serve the present and future circulation needs of the El Segundo community.	**Consistent**. As described in **Section III, Project Description**, of this Draft EIR, the Project would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue. The Project would potentially relocate a portion of an existing truck route that is located on Main Street between El Segundo Boulevard and Grand Avenue; proposes the potential permanent closure of a portion of Richmond Street to vehicles, generally from Franklin Avenue to Grand Avenue, to create a permanent pedestrian only street for outdoor dining and gathering; and recommends maintaining the existing Class III bike route "sharrows" and/or upgrading them to Class II bike lanes. The Project would include pedestrian and transit improvements in the Project area including widened sidewalks and expanded outdoor seating and dining areas for restaurants. Transit improvements could include bus stop enhancements such as additional transit shelters, lighting, and furnishings, and potentially provide expanded bus zones.
Policy C1-1.2: Pursue implementation of all Circulation Element policies such that all Master Plan roadways are upgraded and maintained at acceptable levels of service.	**Not Applicable.** As discussed in **Section IV.L, Transportation**, of this Draft EIR, on September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. SB 743 mandates that alternative metric(s) for determining impacts relative to transportation shall be developed to replace the use of level of service (LOS) in CEQA documents. Pursuant to SB 743, OPR released the draft revised CEQA Guidelines in November 2017, recommending the use of VMT for analyzing transportation impacts. As such, the discussion provided in the transportation analysis for the proposed Project focuses on VMT.
Policy C1-1.8: Provide all residential, commercial, and industrial areas with efficient and safe access to the major regional transportation facilities.	**Consistent.** Downtown El Segundo is located southwest of the interchange of Interstate 405 Freeway (I-405) and State Route 90 (Imperial Highway), west of Pacific Coast Highway and north of El Segundo Boulevard. Interstate 105 Freeway (I-105) is north of the Specific Plan area, immediately north of Imperial Highway. As described in the Specific Plan Update, Chapter 1, Section A.1.b., the Specific Plan area allows for easy and direct access to the regional freeway system.
Policy C1-1.9: Provide all residential, commercial, and industrial areas with efficient and safe access for emergency vehicles.	**Consistent.** As discussed in **Section IV.L, Transportation**, of this Draft EIR, construction activities have the potential to temporarily impact emergency vehicle access to the Project area. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, a

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Policy	Project Consistency
	Construction Traffic Control Plan would be required for future developments. With implementation of a Construction Traffic Control Plan to address pedestrian, bicycle, and vehicular circulation during construction activities, potential impacts related to emergency access would be reduced to less than significant. All areas of the Project area would be accessible to emergency responders for the long-term operation of the Project.
Policy C1-1.14: Require a full evaluation of potential traffic impacts associated with proposed new developments prior to project approval. Further require the implementation of appropriate mitigation measures prior to, or in conjunction with project development. Mitigation measures may include new roadway links on segments that would connect the new development to the existing roadway system, intersection improvements, and other measures. Mitigation measures shall be provided by or paid for by the project developer.	**Consistent. Section IV.L, Transportation**, of this Draft EIR, includes a full evaluation of the potential impacts associated with the Specific Plan Update prior to approval.
Policy C1-1.15: Pursue and protect adequate right-of-way to accommodate future circulation system improvements.	**Consistent.** The Specific Plan Update would include off-site improvements that would be generally contained in rights-of-ways in the Project area. Furthermore, an objective of the Project is to improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.
Policy C1-1.16: Encourage the widening of substandard streets and alleys to meet City standards wherever feasible.	**Consistent**. As described in **Section III, Project Description**, of this Draft EIR, the Project would enhance mobility and expand pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue. The Project would do so through bus stop improvements and pedestrian improvements, such as widened sidewalks and expanded outdoor seating and dining areas for restaurants.
Policy C1-3.2: Ensure that the development review process incorporates consideration of off-street commercial loading requirements for all new projects.	**Consistent.** The Specific Plan Update includes requirements for off-street commercial loading areas. As outlined in the Specific Plan Update, Chapter 2, Section H.6., loading areas are required for buildings with gross building areas equal to or greater than 50,000 square feet and shall not front onto Grand Avenue, Main Street, or Richmond Street. Furthermore, loading docks and service bays shall be a minimum of 20 feet from any public street and at least 18 feet long and ten feet wide**.** By implementing these regulations new development would be designed to create an aesthetic street frontage in the Specific Plan area.
Goal C2: Provide a circulation system that incorporates alternatives to the single-occupant vehicle, to create a balance among travel	**Consistent.** As described in **Section III, Project Description**, of this Draft EIR, Chapter 3, of the Specific Plan Update envisions strategies to optimize

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Policy	Project Consistency
modes based on travel needs, costs, social values, user acceptance, and air quality considerations.	parking supply and demand in the Downtown area, including implementation of shared-parking programs. Future development within the Specific Plan area would be required to implement Transportation Demand Management (TDM) measures that would be considered during the evaluation of new developments within the City, including but not limited to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking. Furthermore, the Specific Plan Update would include improvements to the pedestrian network focusing on access and comfortability on both sidewalks and at roadway crossings, improved bicycle circulation focusing on improved bicycle mobility between Downtown and other points of interest in the City, and improved transit service focusing on enhance mobility to, from, and within Downtown El Segundo.
Objective C2-1: Provide a pedestrian circulation system to support and encourage walking as a safe and convenient travel mode within the City's circulation system.	**Consistent.** One of the objectives of the Project is to improve walkability and the pedestrian environment. The Specific Plan Update would include improvements to the pedestrian network focusing on access and comfortability on both sidewalks and at roadway crossings including adding stable, firm, smooth and slip resistant sidewalks, keeping a clear path of any fixtures and/or obstructions along sidewalks, providing a buffer between pedestrians and moving vehicles, integrating streetscape amenities, adding mirrors to key driveway exits to increase visibility of pedestrians, and upgrading curb cuts to ADA-compliant curb ramps, and installing enhanced paving at crosswalks.
Policy C2-1.6: Encourage shopping areas to design their facilities for ease of pedestrian access.	**Consistent.** As previously stated, Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant use. As described in the Specific Plan Update, Chapter 2, Section H.2., the Specific Plan Update outlines a pedestrian circulation system that supports and encourages walking and requires primary commercial building entrances to be adjacent to the public sidewalk to facilitate pedestrian access to retail uses.
Policy C2-1.7: Closely monitor design practices to ensure a clear pedestrian walking area by minimizing obstructions, especially in the vicinity of intersections.	**Consistent.** As described in **Section III, Project Description**, of this Draft EIR, pedestrian crossings are currently provided throughout Downtown, at both intersections and at some midblock locations. There are four midblock crosswalks, all located on Main Street. These four crosswalks are proposed to be improved with installation of pedestrian signals, raised crosswalks for better visibility, decorative paving to increase their visibility, and upgrade of ramps to meet ADA compliance.
Policy C2-2.1: Implement the recommendations on the Bicycle Master Plan contained in the Circulation Element, as the	**Consistent**. As described in **Section III, Project Description**, of this Draft EIR, the Specific Plan Update proposes the enhancement of east-west

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Policy	Project Consistency
availability arises; i.e., through development, private grants, signing of shared routes.	bicycle facilities through Downtown to connect bike lanes, providing improved bicycle mobility between Downtown and other points of interest in the City. The Specific Plan Update also proposes improved bicycle comfortability to the Class III bicycle route and/or potential upgrade to a Class II bicycle lane along Main Street and Grand Avenue, without compromising direct access to these points of interest, and enhanced bicycle wayfinding signage. Further, bicycle parking facilities in accordance with Municipal Code and California Green Building Code requirements would be provided in future developments in the Specific Plan area.
Policy C2-2.2: Encourage new development to provide facilities for bicyclists to park and store their bicycles and provide shower and clothes changing facilities at or close to the bicyclist's work destination.	**Consistent.** As previously stated, bicycle parking facilities in accordance with Municipal Code and California Green Building Code requirements would be provided in future developments in the Specific Plan area.
Objective C2-5: Ensure the use of Transportation Demand Management (TDM) measures throughout the City, where appropriate, to discourage the single-occupant vehicle, particularly during the peak hours. In addition, ensure that any developments that are approved based on TDM plans incorporate monitoring and enforcement of TDM targets as part of those plans.	**Consistent.** As described in **Section III, Project Description**, of this Draft EIR, the Specific Plan Update envisions strategies to optimize parking supply and demand in the Downtown area, including implementation of shared-parking programs. Future development within the Specific Plan area would be required to implement TDM measures that would be considered during the evaluation of new developments within the City, including but not limited to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.
Policy C2-5.1: Ensure that Transportation Demand Management (TDM) measures are considered during the evaluation of new developments within the City, including but not limited to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.	**Consistent.** As described in **Section III, Project Description**, of this Draft EIR, the Specific Plan Update envisions strategies to optimize parking supply and demand in the Downtown area, including implementation of shared-parking programs. Future development within the Specific Plan area would be required to implement TDM measures that would be considered during the evaluation of new developments within the City, including but not limited to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.
Policy C2-5.3: Encourage the provision of preferential parking for high occupancy vehicles wherever possible.	**Consistent.** As described in **Section III, Project Description**, of this Draft EIR, the Specific Plan Update envisions strategies to optimize parking supply and demand in the Downtown area, including implementation of shared-parking programs. Future development within the Specific Plan area would be required to implement TDM measures that would be considered during the evaluation of new developments within the City, including but not limited to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.

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Policy	Project Consistency
Policy C3-1.8: Require the provision of adequate pedestrian and bicycle access for new development projects through the development review process.	**Consistent.** As discussed in **Section IV.L, Transportation**, of this Draft EIR, the Project would not conflict with any plans or policies regarding existing or proposed transit, bicycle, and pedestrian facilities in the study area. As described in the Specific Plan Update, Chapter 2 and Chapter 3, when a new project is proposed within the Specific Plan area, applicants must submit plans for review. The City will ensure the plans comply with any pedestrian or bicycle related access requirements within the Specific Plan Update. The Specific Plan Update also proposes improved bicycle comfortability to the Class III bicycle route and/or potential upgrade to a Class II bicycle lane along Main Street and Grand Avenue, without compromising direct access to these points of interest, and enhanced bicycle wayfinding signage.
Policy C3-2.1: Ensure the provision of sufficient on-site parking in all new development.	**Consistent**. As described in **Section III, Project Description**, of this Draft EIR, the Specific Plan Update would establish adequate minimum on-site parking requirements for all new development. In addition, it would optimize parking supply and demand in the Downtown area through either striping all available parallel parking spaces with delineation lines to minimize inefficient parking behavior, or potentially converting parallel parking spaces to angled parking spaces where there is enough room in the right-of-way.
Economic Development Element	
Goal ED1: To create in El Segundo a strong, healthy economic community in which all diverse stakeholders may benefit.	**Consistent.** The Project would benefit the existing Downtown area with new commercial/retail land uses which would provide increased economic and fiscal benefits for the City.
Objective ED1-1: To build support and cooperation among the City of El Segundo and its business and residential communities for the mutual benefits derived from the maintenance and expansion of El Segundo's economic base.	**Consistent.** The Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units within the Specific Plan area. This would expand the uses in the Project area and provide increased economic and fiscal benefits for the City.
Policy ED1-1.1: Maintain economic development as one of the City's and the business and residential communities' top priorities.	**Consistent.** An objective of the Specific Plan Update is to attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers. Further, the Project is increasing the City's permanent residential population by an additional 300 multi-family units to support business uses in a jobs-rich City.
Policy ED1-2.1: Seek to expand El Segundo's retail and commercial base so that the diverse needs of the City's business and residential communities are met.	**Consistent.** The Project would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units in the Specific Plan area that would

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	further attract commercial patrons and residential tenants and property owners to City's Downtown area.
Policy ED1-2.2: Maintain and promote land uses that improve the City's tax base, balancing economic development and quality of life goals.	**Consistent.** The Project would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units in the Specific Plan area, which would provide increased economic and fiscal benefits for the City. The addition of 300 multi-family residential units and the mixed-use environment would help create a balance of economic development and quality of life goals.
Goal ED3: To preserve and improve the business environment and image of Downtown El Segundo.	**Consistent.** The Project would promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo, while simultaneously attracting investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers.
Objective ED3-1: To create an economically viable and stable Downtown area that uniquely contributes to El Segundo's commercial options.	**Consistent.** The Project would allow the addition of up to 130,000 square feet of retail/restaurant uses and 300 multi-family residential units in the Specific Plan area that would further attract commercial patrons and residential tenants and property owners to City's Downtown area. Thereby, assisting in the viability of Downtown businesses.
Policy ED3-1.1: Strive to present a clear and consistent image of what the Downtown area is and how it can serve El Segundo's residential and business communities.	**Consistent.** The vision of this Specific Plan Update is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together. The Project would allow the addition of up to 130,000 square feet of retail/restaurant uses and 300 multi-family residential units in the Specific Plan area that would further attract commercial patrons and residential tenants and property owners to City's Downtown area.
Policy ED3-1.2: Preserving the Downtown area's economic viability should be a priority.	**Consistent.** An objective of the Specific Plan Update is to attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers. The Project would allow the addition of up to 130,000 square feet of retail/restaurant uses and 300 multi-family residential units in the Specific Plan area that would further attract commercial patrons and residential tenants and property owners to City's Downtown area. Thereby, assisting in the viability of Downtown businesses.
Policy ED3-1.3: Encourage revitalization efforts that improve the appearance of Downtown area businesses.	**Consistent.** The Project would promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo, while simultaneously attracting investment and increase the economic vitality of Downtown El

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Policy	Project Consistency
	Segundo to foster an active center serving residents, visitors, and local workers
Policy ED3-1.4: Augment the Downtown area's atmosphere and accessibility by addressing vehicle circulation, parking, and streetscape issues.	**Consistent.** As described in **Section III, Project Description**, of this Draft EIR, the Project would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue. The Project proposes the potential permanent closure of a portion of Richmond Street to vehicles, generally from Franklin Avenue to Grand Avenue, to create a permanent pedestrian only street for outdoor dining and gathering. The Project would include pedestrian and transit improvements in the Project area including widened sidewalks and expanded outdoor seating and dining areas for area restaurants.
Policy ED3-1.5: Encourage a mix of retail and commercial businesses that stimulate pedestrian traffic and meet the communities changing needs for goods and services.	**Consistent.** The Project would allow the addition of up to 130,000 square feet of retail/restaurant uses in the Specific Plan area that would further attract commercial patrons and residential tenants and property owners to City's Downtown area.
Housing Element	
Goal 2: Provide sufficient new, affordable housing opportunities in the city to meet the needs of groups with special requirements, including the needs of lower and moderate-income households.	**Consistent.** The Project would allow up to 300 new multi-family residences in the Specific Plan area that would be added to the citywide housing supply. An objective of the Specific Plan Update is to promote a range of housing options with opportunities for all incomes.
Goal 3: Provide opportunities for new housing construction in a variety of locations and a variety of densities.	**Consistent.** The Specific Plan Update seeks to improve the jobs/housing balance in the Downtown area, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees. The Specific Plan Update would include amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels from Downtown Commercial to Downtown Specific Plan, and amend the City's zoning map to change zoning on eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP), which would allow for land uses that encourage reinvestment and revitalization of each Downtown District and to create allowable densities that are high enough to facilitate market-driven redevelopment and would allow for the flexibility to develop desirable land uses.
Policy 3.1: Provide for the construction of adequate housing in order to meet the goals of the Regional Housing Needs Assessment (RHNA).	**Consistent.** As discussed in **Section IV.J, Population and Housing**, of this Draft EIR, the Project would generate an additional 300 multi-family residential units in the Downtown that will be affordable for households of various income levels. The specific allocation between the various income levels will be determined during the development review process.

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Policy 3.3: Facilitate development on vacant and underdeveloped property designated as residential or mixed use to accommodate a diversity of types, prices and tenure.	**Consistent**. The Specific Plan Update involves a hybrid approach to zoning, which combines form-based development standards with a selection of compatible uses tailored for each Specific Plan district and allows for shaping of the built environment, both in design and the types of allowable uses. Such flexibility would facilitate development on vacant and underdeveloped properties within the Specific Plan area by increasing options available to developers to feasibly construct and operate residential and mixed use projects, including affordable housing units. By eliminating maximum density limits and relaxing parking requirements, project designs could include smaller unit sizes and reduced construction costs, respectively, along with increased feasibility of long-term leases, which could potentially reduce rents and enhance property values, thereby further facilitating development on vacant and underdeveloped properties within the Specific Plan area.
Policy 4.1: Continue to allow second units, condominium conversions, caretaker units and second floor residential use in commercial zones as specified in the El Segundo Municipal Code.	**Consistent.** The Specific Plan Update would provide for a variety of uses including retail sales and restaurants at the street edge with office and residential units generally permitted above and behind the ground floor street frontage.
Open Space and Recreation Element	
Goal OS1: Provide and maintain high quality open space and recreational facilities that meet the needs of the existing and future residents and employees within the City of El Segundo.	**Consistent**. As outlined in the Specific Plan Update, Chapter 2, Section G.5., the Specific Plan area has three areas within the Civic Center District that with redesign have potential to be vibrant community plaza spaces. The Specific Plan Update sets specific standards intended to improve the public plazas and facilitate more public gathering and events in those locations. Furthermore, future development in the Specific Plan area would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees to support park improvements as well as fund capital costs for other new and existing infrastructures.
Conservation Element	
Policy CN2-5: Require new construction and development to install water-conserving fixtures and appliances to reduce the amount of new demand.	**Consistent.** Future development in the Specific Plan area would comply with the Specific Plan Update design standards, including those outlining sustainability-focused measures at or above Title 24 requirements. The installations of green infrastructure combined with high standards for energy-efficient buildings contained within the California Building Code, would ensure that Project meet the City's requirements for sustainability and green development, both for construction and operation.
Policy CN2-7: Require new construction and development to incorporate the principles and practices of sound landscape design and	**Consistent**. The Specific Plan Update includes open space standards to ensure adequate landscaping area and permanent maintenance for the Specific Plan area.

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Policy	Project Consistency
management, particularly those conserving water and energy.	It addresses standards for all landscaping, building perimeter landscaping, property perimeter landscaping, vehicular use areas, and minimum sizes for plant material. Additionally, as addressed in **Section IV.N**, **Utilities**, of this Draft EIR, the Project identifies sustainability standards related to energy efficiency requirements, bicycle parking, lighting efficiency, utilization of low-emitting building materials, roof structure, and reclaimed water. Future development would comply with the proposed Specific Plan's design standards, including those outlining open space and sustainability-focused measures at or above Title 24 requirements. The installations of low-impact development features and landscaping would ensure that Project meet the City's requirements for conservation. Reclaimed water would be used in all landscaped areas if available and feasible.
Policy CN2-11: Encourage, whenever appropriate and feasible, development techniques which minimize surface run-off and allow replenishment of soil moisture. Such techniques may include, but not be limited to, the on-site use and retention of storm water, the use of pervious paving material (such as walk-on-bark, pea gravel, and cobble mulches), the preservation of vegetative covers, and efficiently designed and managed irrigation systems.	**Consistent.** Future project design, construction, and operation would be completed consistent with the Los Angeles Water Quality Compliance Master Plan for Urban Runoff, consistent with the Enhanced Watershed Management Program, and in accordance with the ESMC-mandated City Stormwater and Urban Runoff Pollution Control Ordinance, NPDES Permit, and the City's LID Manual, with the goal of reducing the amount of pollutants in stormwater and urban runoff. The LID Manual states that BMPs are to be designed to manage and capture stormwater runoff. Future development would comply with the Specific Plan's design standards, including those outlining sustainability-focused measures at or above Title 24 requirements. The installations of low-impact development features and landscaping would ensure that future development meet the City's requirements for conservation. Further, parking lot areas must include storm water management practices that treat storm water runoff in compliance with the ESMC and all applicable law.
Policy CN5-1: Preserve the character and quality of existing neighborhood and civic landscapes.	**Consistent.** The vision of this Specific Plan Update is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together. Therefore, the Project would maintain the character and quality of the land uses within the Downtown area and would not intrude upon existing surrounding properties.
Goal AQ1: Person work trip reduction for private employees.	**Consistent.** As described in **Section III, Project Description**, of this Draft EIR, the Specific Plan Update envisions implementation of shared-parking programs. Future development within the Specific Plan area would be required to implement TDM measures that would be considered during the evaluation of new developments within the City, including but not limited

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Policy	Project Consistency
	to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.
Goal AQ3: Vehicle work trip reduction for private employees.	**Consistent**. The Specific Plan Update incorporates specific objectives to promote walkability and bicycle infrastructure, which would reduce vehicle miles traveled.
Objective AQ-3-1: Increase the proportion of work trips made by transit.	**Consistent**. The Project would provide new living and working opportunities in close proximity to transit, thereby increasing ridership. Public transit that operates in the vicinity of the Specific Plan area includes a Beach Cities bus line. Beach Cities Line 109 provides local service between the City of Redondo Beach and LAX and runs along Main Street.
Objective AQ-4-1: Promote non-motorized transportation.	**Consistent**. As described in **Section III, Project Description**, of this Draft EIR, the Specific Plan Update proposes the enhancement of east-west bicycle facilities through Downtown to connect bike lanes, providing improved bicycle mobility between Downtown and other points of interest in the City. The Specific Plan Update also proposes improved bicycle comfortability to the Class III bicycle route and/or potential upgrade to a Class II bicycle lane along Main Street and Grand Avenue, without compromising direct access to these points of interest, and enhanced bicycle wayfinding signage. Further, bicycle parking facilities in accordance with Municipal Code and California Green Building Code requirements would be provided in future developments in the Specific Plan area.
Policy AQS 10-1.2: It is the policy of the City of El Segundo to adopt incentives, regulations, and/or procedures to prohibit the use of building materials and methods which generate excessive pollutants.	**Consistent.** CALGreen establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. Future development would implement CALGreen standards, which include measures to reduce building materials that would generate excessive pollutants, such as using recycled content in building materials. Additionally, the City adopted the 2022 edition of the CALGreen with amendments. Therefore, future development would be constructed consistent with the City's Municipal Code requirements and CALGreen.
Policy AQS 10-1.3: It is the policy of the City of El Segundo that all new development projects meet or exceed requirements of the SCAQMD for reducing PM_{10} standards.	**Consistent.** Future development would be constructed and operated as not to exceed the SCAQMD's significance thresholds for coarse particulate matter (PM_{10}) during construction in all construction years.
Goal AQ12: Reduction in Residential, Commercial, and Industrial Energy Consumption.	**Consistent**. Future development would comply with the proposed Specific Plan's design standards, including those outlining sustainability-focused

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Policy	Project Consistency
	measures at or above Title 24 requirements and would be consistent with the regulations set forth in CALGreen and the City's Municipal Code, which adopted the 2022 edition of the CALGreen with amendments, which have robust requirements for energy. Other sustainability features include energy efficiency exterior lighting, low-emitting building materials, roof structures to support solar panels, and reclaimed water on landscaped areas. Additionally, as set forth in 2022 Building Energy Efficiency Standards, low-rise and high-rise multi-family buildings, hotels, and nonresidential buildings must include a "solar zone on the roof or overhang of the building or on covered parking and must have a total area no less than 15 percent of the total roof area of the building excluding any skylight area." The solar zone requirement is applicable to entire buildings, including mixed-occupancy.
Policy AQ-12-1.2: It is the policy of the City of El Segundo that the City encourage the incorporation of energy conservation features in the design of new projects and the installation of conservation devices in existing developments.	**Consistent.** As previously stated, future development must comply with all relevant measures applicable to the types of structures to be built, including non-residential, low-rise residential, and high-rise residential. Compliance with Title 24 would ensure the future development is designed with appropriate energy efficient devices. As such, future development would be consistent with the regulations set forth in CALGreen and the City's Municipal Code, which adopted the 2022 edition of the CALGreen with amendments, which have robust requirements for energy conservation and electric vehicle charging. Future development would be constructed to be ready for electric vehicle charging stations.
Policy AQ 12-1.4: It is the policy of the City of El Segundo that new construction not preclude the use of solar energy systems by uses and buildings on adjacent properties and consider enactment of a comprehensive solar access ordinance.	**Consistent.** The Specific Plan Update would not influence the City's enactment of comprehensive solar access. As set forth in 2022 Building Energy Efficiency Standards, low-rise and high-rise multi-family buildings, hotels, and nonresidential buildings must include a "solar zone on the roof or overhang of the building or on covered parking and must have a total area no less than 15 percent of the total roof area of the building excluding any skylight area." The solar zone requirement is applicable to entire buildings, including mixed-occupancy.
Policy AQ 13-1.1: It is the policy of the City of El Segundo that the City continue to implement the programs proposed in the City's Solid Waste Management Plan, concurrent with California Assembly Bill 939, to achieve a 25% reduction in residential solid waste requiring (disposal by 1995, and a 50% reduction by the year 2000).	**Consistent.** Future development would include solid waste facilities within the Specific Plan area that must comply with all ESMC requirements pertaining to building, fire, zoning codes (e.g., adequate trash enclosures and screening). Future development would comply with all applicable laws and regulations related to solid waste and recycling, as discussed in Section **IV.N, Utilities and Service Systems**, of this Draft EIR.

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Policy	Project Consistency
Goal AQ14: Prevent exposure of people, animals, and other living organisms to toxic air pollutants.	**Consistent.** Future development would be constructed as not to exceed the SCAQMD significance thresholds for volatile organic compounds (VOC), nitrous oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), coarse particulate matter (PM_{10}), or fine particulate matter ($PM_{2.5}$) during construction in all construction years and operation of future projects.
Goal AQ15: Prevent exposure of people, animals, and other living organisms to unhealthful levels of air pollution.	**Consistent.** In addition to adhering to smart growth principles of locating infill development adjacent to existing employment centers and public transportation options, future development with the Specific Plan area would incorporate a wide range of building technologies, and design features such as high efficiency toilet and urinals, low flow showerheads and private and commercial faucets, draught tolerant and native plants, drip/subsurface, zoned irrigation with weather-based irrigation controllers, water-conserving turf, high-efficiency residential and commercial clothes washers, water-saving pool filters, and leak detection systems for pools and jacuzzis, that would protect the environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Future development energy efficiency features and location near transit facilities could help reduce the energy and emission footprint of the Specific Plan area and the per capita GHG emissions of the residents and visitors from private automobile travel.
Policy AQS 15-1.1: It is the policy of the City of El Segundo to protect the residents of the City and others from exposure to unsafe levels of air pollution, including but not limited to, pollutants such as VOCs, particulates, NOx, SOx, lead, O3, and CO, by taking all appropriate air pollution control measures to reduce unsafe levels of air pollutants impacting the City.	**Consistent.** Future development would be constructed as not to exceed the SCAQMD significance thresholds for volatile organic compounds (VOC), nitrous oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), coarse particulate matter (PM_{10}), or fine particulate matter ($PM_{2.5}$) during construction in all construction years and operation of future projects.
Noise Element	
Goal N1: Encourage a high quality environment within all parts of the City of El Segundo where the public's health, safety, and welfare are not adversely affected by excessive noise.	**Consistent.** As further described in **Section IV.I, Noise**, of this Draft EIR, future development within the Specific Plan area would require mitigation measures during construction to ensure noise levels do not exceed the City's hourly threshold of 65 A-weighted decibels (dBA) Leq at the existing nearest residential properties. Once operational, future development would not expose the City's residents to excessive noise as a result of roadway traffic nor stationary operations noise. See **Section IV.I, Noise**, of this Draft EIR, for more discussion.
Objective N1-1: It is the objective of the City of El Segundo to ensure that City residents are not	**Consistent.** The Project would be subject to the policies and standards outlined in the ESMC. As stated

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Policy	Project Consistency
exposed to mobile noise levels in excess of the interior and exterior noise standards or the single event noise standards specified in the El Segundo Municipal Code.	in **Section IV.I, Noise**, of this Draft EIR, implementation of future development would all be subject to applicable noise standards.
Objective N1-2: It is the objective of the City of El Segundo to ensure that City residents are not exposed to stationary noise levels in excess of El Segundo's Noise Ordinance standards.	**Consistent.** Future development would be subject to the policies and standards outlined in the ESMC. Additionally, future development would allow new residential, commercial, and office uses within the Specific Plan area. Future development would require operation of construction equipment and processes not to exceed noise levels of 80 dBA Leq, which the Federal Transit Administration recommends as a daytime threshold for construction noise exposure over an 8-hour period at a residential receptor. Construction activities associated within the Specific Plan area would take place within the hours of 7:00 a.m. and 6:00 p.m. in accordance with the City's General Plan and ESMC. In summary, typical construction noise during allowable daytime hours would not exceed the aforementioned Federal Transit Administration guidance-based standard. Thus, temporary construction-related noise impacts would be less than significant.
Policy N1-2.1: Require all new projects to meet the City's Noise Ordinance Standards as a condition of building permit approval.	**Consistent.** The Project would be subject to the policies and standards outlined in the ESMC. As stated in **Section IV.I, Noise**, of this Draft EIR, implementation of future development would all be subject to applicable noise standards.
Program N1-2.1A: Address noise impacts in all environmental documents for discretionary approval projects, to ensure that noise sources meet City Noise Ordinance standards. These sources may include mechanical or electrical equipment, truck loading areas, or outdoor speaker systems.	**Consistent.** Future development would be subject to the policies and standards outlined in the ESMC. As discussed under Policy N1-2.1, implementation of the future development would be subject to the City's Noise Ordinance standards. Noise sources include construction equipment, including graders, backhoes, excavators, loaders, cranes, dozers, cement pump trucks, pavers, rollers, welders, concrete saws, and air compressors. Operational sources include off-site roadway traffic noise, and on-site noise-producing mechanical equipment, such as residential heating units, ventilation, air conditioning. As further described in **Section IV.I, Noise**, of this Draft EIR, future development would be required that during construction noise levels do not exceed the City's hourly threshold of 65 dBA Leq at the existing nearest residential properties. Once operational, the future development would be in compliance with the City's noise ordinance. Therefore, noise impacts have been addressed within this Draft EIR to ensure noise sources meet City Noise Ordinance standards.
Program N1-2.1C: The City shall strictly enforce the El Segundo Municipal Code's time-dependent noise standards for stationary	**Consistent.** Future development within the Specific Plan area would comply with the City's time-dependent noise standards for stationary sources.

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Policy	Project Consistency
sources. Two of the major sources which shall be closely monitored are industrial facilities and construction activities.	
Policy N1-3.1: Encourage site planning to be consistent with the existing and future noise environment and promote development standards in which noise-sensitive projects and residences are mitigated from major noise sources. Short-term and long-term noise control measures should be formulated in a manner compatible with community needs and expectations.	**Consistent.** The Project would be subject to the policies and standards outlined in the ESMC. As stated in **Section IV.I, Noise**, of this Draft EIR, implementation of future development would all be subject to applicable noise standards.
Public Safety Element	
Goal PS1: Protect the public health and safety and minimize the social and economic impacts associated with geologic hazards.	**Consistent.** Future development would comply with all existing health and safety standards outlined in the ESMC. Specifically, future development would comply with existing building code regulations. As addressed in **Section IV.E, Geology and Soils**, of this Draft EIR, all impacts related to potential risk of loss, injury, or death involving geology and soils are less than significant.
Objective PS1-1: It is the objective of the City of El Segundo to reduce exposure to potentially hazardous geological conditions through land use planning and project review.	**Consistent. Section IV.E, Geology and Soils**, of this Draft EIR provides the City with a thorough review of potentially hazardous geologic conditions in the Project area. As addressed in **Section IV.E, Geology and Soils**, all impacts related to potential risk of loss, injury, or death involving geology and soils are less than significant.
Program PS1-1.1A: The City shall review projects to ensure that slope design considers the potential effects of high rainfall, private sewage systems, landscaping irrigation, and possible runoff from adjacent future development.	**Consistent.** In the event of high rainfall, proposed drainage would include stormwater treatment features on future development sites within the Specific Plan area, in accordance with the City of El Segundo LID requirements. These treatment features are designed to treat the 85th percentile storm event, while overflow drainage features would be designed based on the 25-year storm event. With regards to the sewer system, it is anticipated that if new sewer laterals are required for future development they would connect to several of the existing gravity lines surrounding the Specific Plan area. Points of connection would be based on the City's input and would require a Sewer Connection Permit from the City. Landscaped areas must be provided and permanent irrigation systems installed in the landscaped areas at (1) around the perimeter of the buildings in the setbacks, (2) within the required setbacks along the property perimeter, and (3) in the Vehicular Use Areas as defined in ESMC Section 15-1-6. Additionally, future development would minimize runoff through LID standards.
Program PS1-1.2A: The City shall review projects to ensure that adequate geotechnical investigation has been completed in areas	**Consistent.** Future development would comply with all existing health and safety standards outlined in the ESMC. Specifically, the future development would

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Policy	Project Consistency
susceptible to landsliding and debris flows and in areas where collapsible or expansive soils occur, and to approve only those which mitigate these hazards to the satisfaction of the City Engineer.	comply with existing building code regulations. See **Section IV.E, Geology and Soils**, of this Draft EIR, for more discussion.
Goal PS2: Minimize injury and loss of life~ property damage, and social~ cultural and economic: impacts caused by earthquake hazards.	**Consistent.** As discussed in **Section IV.E, Geology and Soils**, of this Draft EIR, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. As a result, no impact related to surface rupture of a known earthquake fault would occur. Additionally, future project construction would be completed in accordance with the CBC. As with all development within the City of El Segundo, development within the Project area would be required to comply with the seismic safety requirements of the CBC. The CBC provides procedures for earthquake resistant structural design that includes considerations for on-site soil conditions, occupancy, and the configuration of the structure, including the structural system and height. Although substantial damage to structures may be unavoidable during large earthquakes, proposed structures would be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage, and loss of life.
Policy PS3-1.1: Review proposed development projects involving the use, storage, and disposal of hazardous materials with the intent of minimizing the probability and magnitude of a hazardous event.	**Consistent.** As part of this Draft EIR, the potential for future development within the Specific Plan area to result in risk related to the use, storage, and disposal of hazardous materials was analyzed in **Section IV.G, Hazards and Hazardous Materials**, of this Draft EIR. Hazardous materials that may be used during construction and demolition activities of the future development include, but are not limited to, gasoline, diesel fuel, lubricants, grease, adhesives, welding gases, solvents, paints, and vehicle and equipment-maintenance related materials. The use and handling of these substances are subject to applicable federal, State, and local health and safety laws and regulations, which would minimize health risk to the public associated with hazardous materials.
Goal PS4: Prevent exposure of people, animals, and other living organisms to toxic water and soil contaminants**.**	**Consistent.** As part of this Draft EIR, the potential for future development within the Specific Plan area to result in risk related to the use, storage, and disposal of hazardous materials was analyzed in **Section IV.G, Hazards and Hazardous Materials**, of this Draft EIR. Hazardous materials that may be used during construction and demolition activities of the future development include, but are not limited to, gasoline, diesel fuel, lubricants, grease, adhesives, welding gases, solvents, paints, and vehicle and equipment-maintenance related materials. The use and handling of these substances are subject to applicable federal,

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Policy	Project Consistency
	State, and local health and safety laws and regulations, which would minimize health risk to the public associated with hazardous materials.
Policy PS5-1.2: Continue to monitor and improve the effectiveness of existing flood control systems to ensure that there is adequate capacity to protect existing and proposed development from stormwater runoff.	**Consistent.** The Project area is fully developed in the existing condition and is located in a highly urbanized portion of El Segundo, surrounded by developed properties. Implementation of future development would not alter the existing drainage patterns in the area such that downstream streams or rivers would be affected. Future development would infiltrate stormwater in accordance with all applicable LID regulations, and would continue to outflow into the existing storm drain system.
Goal PS6: A fire safe community.	**Consistent.** The future development would comply with all existing health and safety standards outlined in the ESMC. Future development would be subject to the requirements of the fire code standard. This would be ensured through the plan check process and fire review prior to the issuance of building permits.
Policy PS6-1.1: Review projects and development proposals, and upgrade fire prevention standards and mitigation measures in areas of high urban fire hazard.	**Consistent.** The future development would be designed and constructed in accordance with all applicable provisions of the fire code, which includes requirements for adequate fire flows, width of emergency access routes, turning radii, automatic sprinkler systems, fire alarms, and floor to sky height limits along emergency access routes. Compliance with the fire code standards would be ensured through the plan check process and fire review prior to the issuance of building permits future development. More specifically, future development would be designed to include the following fire protection features, which would help prevent fire hazards: appropriate roadway access for fire lines, El Segundo Fire Department connections and fire sprinkler system control valves, and a fire alarm system. These fire safety features and compliance with fire code standards would reduce the potential demand for fire services by decreasing the likelihood and/or severity of a fire emergency at the site.
Goal PS7: Protect public health, safety, and welfare, and minimize loss of life, injury, property damage, and disruption of vital services, resulting from earthquakes, hazardous material incidents, and other natural and man-made disasters.	**Consistent.** Future development construction would be completed in accordance with the CBC. As with all development within the City of El Segundo, development within the Project area would be required to comply with the seismic safety requirements of the CBC. The CBC provides procedures for earthquake resistant structural design that includes considerations for on-site soil conditions, occupancy, and the configuration of the structure, including the structural system and height. Additionally, any abatement of hazardous materials identified in the Project area would remove the potential for exposure of the public and the environment to accidental release of

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Policy	Project Consistency
	hazardous materials Use of extremely hazardous materials and accumulation of acutely hazardous wastes are not anticipated.
Policy HM5-1.1: Adopt waste minimization as a first priority in waste management strategies in the City.	**Consistent.** As discussed in **Section IV.G, Hazards and Hazardous Materials**, of this Draft EIR, the future construction would generate construction waste. Many of the anticipated construction materials may be recycled. Hazardous wastes that cannot be recycled would be transported by a licensed hazardous waste hauler following manifest procedures disposed of at an appropriately permitted off-site facility. The use and handling of these substances are subject to applicable federal, State, and local health and safety laws and regulations. Hazardous materials that may be used during construction and demolition activities of the future development include, but are not limited to, gasoline, diesel fuel, lubricants, grease, adhesives, welding gases, solvents, paints, and vehicle and equipment-maintenance related materials. The use and handling of these substances are subject to applicable federal, State, and local health and safety laws and regulations, which would minimize health risk to the public associated with hazardous materials. Should the amount of on-site hazardous materials, including hazardous wastes, be greater than reporting thresholds (55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of compressed gas), a Hazardous Material Business Plan (HMBP) would be required under CA HSC, Division 20, Chapter 6.11, Sections 25404- 25404.9.
Source: City of El Segundo General Plan Land Use Element, 1992 (updated 2001); EcoTierra Consulting, 2023.	

A review of the El Segundo General Plan shows that the Specific Plan Update would be compatible and consistent with the goals, objectives, and policies outlined in the General Plan. The proposed Specific Plan Update was prepared to provide the essential relationship between the policies of the El Segundo General Plan and actual development of the Specific Plan area. By functioning as a regulatory document, the Specific Plan Update would provide a means of implementing the City of El Segundo's General Plan. All future development plans and entitlements within the Specific Plan area boundaries must be consistent with the standards set forth in the Specific Plan Update, as described in **Section III, Project Description**, of this Draft EIR. Therefore, based on **Table IV.H-1, Consistency with the Applicable Goals, Objectives, and Policies of the General Plan**, and the reasons described above, the Project would be consistent with the General Plan.

(3) City of El Segundo Municipal Code

The City of El Segundo Zoning Code (Title 15), in conformance with the General Plan, regulates land use development in the City. In each zone, the zoning regulations specify the permitted and

prohibited uses, and the development standards, including setbacks, height, parking, and design standards, among others.

(4) Specific Plan

When a specific plan is adopted, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and permitting criteria. The Specific Plan is adopted by ordinance and serves as the primary zoning document for the Plan Area. Where the Specific Plan is silent, the relevant sections and requirements of the ESMC zoning regulations shall apply. The development standards would be regulated by the Specific Plan and administered and enforced by the City in accordance with the ESMC. The Specific Plan supersedes any conflicts with ESMC zoning regulations. Therefore, upon approval of the Project, the Project would be consistent with the El Segundo Zoning Code for the purposes of avoiding or mitigating environmental effect.

(5) Conclusion

Based on the analysis provided above, the Project would be consistent with the SCAG 2020–2045 RTP/SCS, City of El Segundo General Plan, and the ESMC. The Specific Plan proposes to implement design guidelines to create a mix of residential and commercial land uses. The design guidelines would promote the transformation of Specific Plan areas that are underutilized. The mix of land uses within the Specific Plan areas, including a wide range of commercial, residential, and public uses, would reduce automobile trips by creating a pedestrian-oriented, multi-modal environment. The Specific Plan Update sets forth the development standards of the four districts; however, where the document does not include specific development standards, the ESMC shall be the controlling document. Thus, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project area adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant. No mitigation would be required.

5. Cumulative Impacts Analysis

Cumulative land use impacts could occur if any of the related projects would result in incompatible land uses, or result in land uses that are inconsistent with adopted land use plans when combined with the impacts of the Project. Given the built-out conditions of the urban area, including the Project Site, cumulative development would likely convert existing underutilized properties in the Project Site's area to revitalized high density developments to respond to the need for housing, sources of employment, and associated retail land uses. The Project would benefit the surrounding community by replacing underutilized properties; adding residential uses to a job-rich community; and improving local and regional access to the regional transportation network. Furthermore, by providing additional housing and employment in close proximity to transit, the Project would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently using existing infrastructure, reducing regional congestion, and improving air quality through the reduction of vehicle miles traveled. This is

consistent with SCAG and other regional policies for promoting more intense land uses adjacent to transit stations and job centers.

Generally, land use conflicts would be related to noise, traffic, air quality, and hazards/human health and safety issues, which are discussed in the relevant sections of this Draft EIR. Land use conflicts are also typically site specific and not cumulative in nature; in other words, despite the number of cumulative projects in a given area, they would not necessarily compound to create cumulative land use conflicts. Cumulative incompatibility issues associated with surrounding developments or projects are anticipated to be addressed and mitigated for on a project-by-project basis. In addition, the cumulative environmental effects associated with implementation of the Specific Plan have been addressed in the technical sections of this Draft EIR.

Further, all related projects in the City would be subject to the same local development standards, such as those identified in the ESMC, as the Project. Therefore, cumulative impacts related to land use and planning would be less than significant and no mitigation would be required.

6. Mitigation Measures

Project-level and cumulative impacts with regard to land use and planning would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to land use and planning would be less than significant.

8. References

City of El Segundo. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed August 2023.

City of El Segundo. City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed August 2023.

City of El Segundo. El Segundo Municipal Code, Section 15-26-8.

IV. Environmental Impact Analysis

I. Noise

1. Introduction

This section describes the existing noise conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. The analysis is primarily based on the *Noise Study for the El Segundo Downtown Specific Plan Update Project* (Noise Study) prepared by Noah Tanski Environmental Consulting (NTEC), dated September 13, 2023, included in **Appendix G** of this Draft EIR. Other sources consulted are listed in **Section IV.I.8, References**, below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

The Project involves the implementation of the proposed Specific Plan, which totals approximately 43.8 acres of land located in the City of El Segundo (City). Ambient outdoor noise sources in the Specific Plan area include traffic along adjacent roads, LAX aircraft noise, railway noise, and industrial noise.

a) Noise Terminology and Characteristics

(1) Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as undesirable (i.e., loud, unexpected, or annoying) sound. Acoustics is defined as the physics of sound and addresses its propagation and control.[1] In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determine the sound level and characteristics of the noise perceived by the receiver.

[1] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.*

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement and reflects the way people perceive changes in sound amplitude. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of feeling pain. Pressure waves traveling through air exert a force registered by the human ear as sound.[2]

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude. When all of the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequencies spanning 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.[3]

The typical human ear is not equally sensitive to the frequency range from 20 to 20,000 Hz. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements.[4] Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in **Table IV.I-1**, **Decibel Scale and Common Noise Sources**.

Table IV.I-1
Decibel Scale and Common Noise Sources

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 100 feet		
	—100—	
Gas Lawnmower at 3 feet		
	—90—	
Diesel Truck going 50 mph at 50 feet		Food Blender at 3 feet
	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room

[2] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.*
[3] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.*
[4] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.*

Table IV.I-1
Decibel Scale and Common Noise Sources

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing

Note: Colors are for illustrative purposes only.
Source: Caltrans, Technical Noise Supplement, Page 2-20, September 2013.

(2) Noise Exposure and Community Noise

Community noise exposure is typically measured over a period of time; a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many unidentifiable individual contributors. Single-event noise sources, such as aircraft flyovers, sirens, etc., may cause sudden changes in background noise level.[5] However, generally, background noise levels change gradually throughout the day, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume.

These successive additions of sound to the community noise environment change the community noise level from moment to moment, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time.[6]

L_{eq}: The equivalent sound level over a specified period of time, typically, 1 hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.

L_{max}: The maximum, instantaneous noise level experienced during a given period of time.

L_{min}: The minimum, instantaneous noise level experienced during a given period of time.

[5] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.*
[6] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.2, September 2013.*

L_x: The noise level exceeded a percentage of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

L_{dn}: The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dBA to measured noise levels between the hours of 10:00 P.M. to 7:00 A.M. the next day to account for nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level (DNL).

CNEL: The Community Noise Equivalent Level (CNEL) is the time average A-weighted noise level during a 24-hour day that includes an addition of 5 dBA to measured noise levels between the hours of 7:00 P.M. to 10:00 P.M. and an addition of 10 dBA to noise levels between the hours of 10:00 P.M. to 7:00 A.M. the next day to account for noise sensitivity in the evening and nighttime, respectively.

(3) Effects of Noise on People

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startled response); and
- Physical effects (e.g., hearing loss).

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep.

The World Health Organization's Guidelines for Community Noise details the adverse health effects of high noise levels, which include hearing impairment, speech intelligibility, sleep disturbance, physiological functions (e.g. hypertension and cardiovascular effects), mental illness, performance of cognitive tasks, social and behavioral effects (e.g. feelings of helplessness, aggressive behavior), and annoyance.[7]

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise, or the

[7] *World Health Organization edited by Berglund, Birgitta, Lindvall, Thomas, Schwela, Dietrich H. Guidelines for Community Noise, 1999. https://apps.who.int/iris/handle/10665/66217, accessed September 2023.*

corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur:[8]

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived.
- Outside of the laboratory, a change of 3 dBA in ambient noise levels is considered to be a barely perceivable difference.
- A change of 5 dBA in ambient noise levels is considered to be a readily perceivable difference; and
- A change of 10 dBA in ambient noise levels is subjectively heard as doubling of the perceived loudness.

These relationships between change in noise level and human hearing response occur in part because of the logarithmic nature of sound and the dB scale. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but rather logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3-dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dB scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and 10 sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source.[9]

(4) Noise Attenuation

When noise propagates over a distance, the noise level reduces, or attenuates, with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." The rate of sound attenuation for a point source, such as a piece of mechanical or electrical equipment (e.g., air conditioner) or idling vehicle (e.g., bulldozer), is 6 dBA per doubling of distance from the noise source to the receptor over acoustically "hard" sites and 7.5 dBA per doubling of distance from the noise source to the receptor over acoustically "soft" sites.[10] Hard

[8] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.*

[9] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1.1, September 2013.*

[10] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.1.and 2.1.4.2, September 2013.*

sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provides an excess ground attenuation value of 1.5 dBA (per doubling distance).[11] For example, an outdoor condenser fan that generates a sound level of 60 dBA at a distance of 50 feet from a point source at an acoustically hard site would attenuate to 54 dBA at a distance of 100 feet from the point source and attenuate to 48 dBA at 200 feet from the point source.

Roadways and highways consist of several localized noise sources on a defined path, and hence are treated as "line" sources, which approximate the effect of several point sources.[12] Noise from a line source propagates over a cylindrical surface, often referred to as "cylindrical spreading."[13] Line sources (e.g., traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.[14] Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Structures (e.g., buildings and solid walls) and natural topography (e.g., hills and berms) that obstruct the line-of-sight between a noise source and a receptor further reduce the noise level if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., the line-of-sight is not fully blocked), barrier insertion loss would still occur but to a lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall can reflect noise back to the receptor, thereby compounding the noise. Noise barriers can provide noise level reductions ranging from approximately 5 dBA (where the barrier just breaks the line-of-sight between the source and receiver) to an upper range of 20 dBA with a larger barrier.[15] Additionally, structures with closed windows can further attenuate exterior noise by a minimum of 20 dBA to 30 dBA.[16]

Receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels.[17]

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[11] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.1 and 2.1.4.2, September 2013.*

[12] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.*

[13] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.*

[14] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.*

[15] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.2 and 5.1.1, September 2013.*

[16] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 7.4.2, Table 7-1, September 2013.*

[17] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.3, September 2013.*

Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances. Other factors such as air temperature, humidity, and turbulence can, under the right conditions, also have substantial effects on noise levels.[18]

(5) Vibration Fundamentals

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Since energy is lost during its transfer from one particle to another, vibration becomes less perceptible with increasing distance from the source.

As described in the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual*, groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard.[19] In contrast to airborne noise, groundborne vibration is not a common environmental problem, as it is unusual for vibration from sources such as rubber-tired buses and trucks to be perceptible, even in locations close to major roads. Some common sources of groundborne vibration are trains, heavy trucks traveling on rough roads, and certain construction activities, such as blasting, pile-driving, and operation of heavy earth-moving equipment.[20] Groundborne vibration generated by man-made activities (e.g., road traffic, construction operations) typically weakens with greater horizontal distance from the source of the vibration.

Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec), and is most frequently used to describe vibration impacts to buildings.[21] The root mean square (RMS) amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body.[22] Decibel notation (VdB) is commonly used to express RMS vibration velocity amplitude. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity; FTA uses a crest factor of 4.[23] The decibel notation VdB acts to compress the range of numbers required to describe vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include buildings where vibration would interfere with operations within the building or cause

[18] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.3, September 2013.*
[19] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 7, 2018.*
[20] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 7, 2018.*
[21] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.*
[22] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.*
[23] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.*

damage (especially older masonry structures), locations where people sleep, and locations with vibration sensitive equipment.[24]

Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.[25] The relationship between groundborne vibration and groundborne noise depends on the frequency of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise level that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 to 37 decibels lower than the velocity level.[26] Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

b) Noise-Sensitive Receptors

Noise- and vibration-sensitive land uses are typically considered locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, and hospitals are usual examples, with others depending on what the local jurisdiction may have defined or established. The Specific Plan Update area primarily includes a range of neighborhood-serving commercial land uses, such as retail, restaurants, offices, and banks; all of which would not be considered noise-sensitive. Noise-sensitive land uses identified within the Specific Plan Update area include:[27]

- El Segundo United Methodist Church (540 Main Street);
- St. Michael's Episcopal Church and Children's Center (361 Richmond Street);
- Multi-family residential building (350 Richmond Street);
- Residential uses along Richmond Street near Grand Avenue; and
- Old Town Music Hall (140 Richmond Street).

The land uses surrounding the Specific Plan Update area are generally residential in nature but contain a variety of additional uses. Noise-sensitive uses identified adjacent or in close proximity to the Specific Plan Update area include:[28]

[24] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 6.1, 6.2, and 6.3, 2018.*
[25] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 5.4, 2018.*
[26] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-3 and Table 6-14, pages 126 and 146, 2018.*
[27] *Noah Tanski Environmental Consulting, Noise Study, El Segundo Downtown Specific Plan Update Project, September 13, 2023.*
[28] *Noah Tanski Environmental Consulting, Noise Study, El Segundo Downtown Specific Plan Update Project, September 13, 2023.*

- El Segundo Public Library (111 West Mariposa Avenue) – directly north of the Specific Plan area, across Mariposa Avenue.
- Richmond Street Elementary School (615 Richmond Street) – approximately 275 feet northeast of the Specific Plan area.
- Library Park – directly north of the Specific Plan area, across Mariposa Avenue.
- El Segundo High School (640 Main Street) – directly north of the Specific Plan area, across Mariposa Avenue.
- El Segundo Performing Arts Center (640 Main Street) – approximately 350 feet north of the Specific Plan area.
- El Segundo Pre-School (301 West Grand Avenue) – directly west of the Specific Plan area, across Concord Street.
- Concord Hotel (221 Concord Street) – approximately 70 feet west of the Specific Plan area.
- El Segundo Christian Church (223 West Franklin Avenue) – directly west of the Specific Plan area.
- Residential land uses located along and west of Richmond Street – the nearest residential uses are directly north of the Specific Plan area, across Holly Avenue.
- Residential land uses located along and east of Standard Street – the nearest residential uses are directly east of the Specific Plan area, across Standard Street.
- Residential land uses located along and west of Concord Street – the nearest residential uses are directly west of the Specific Plan area, across Concord Street.

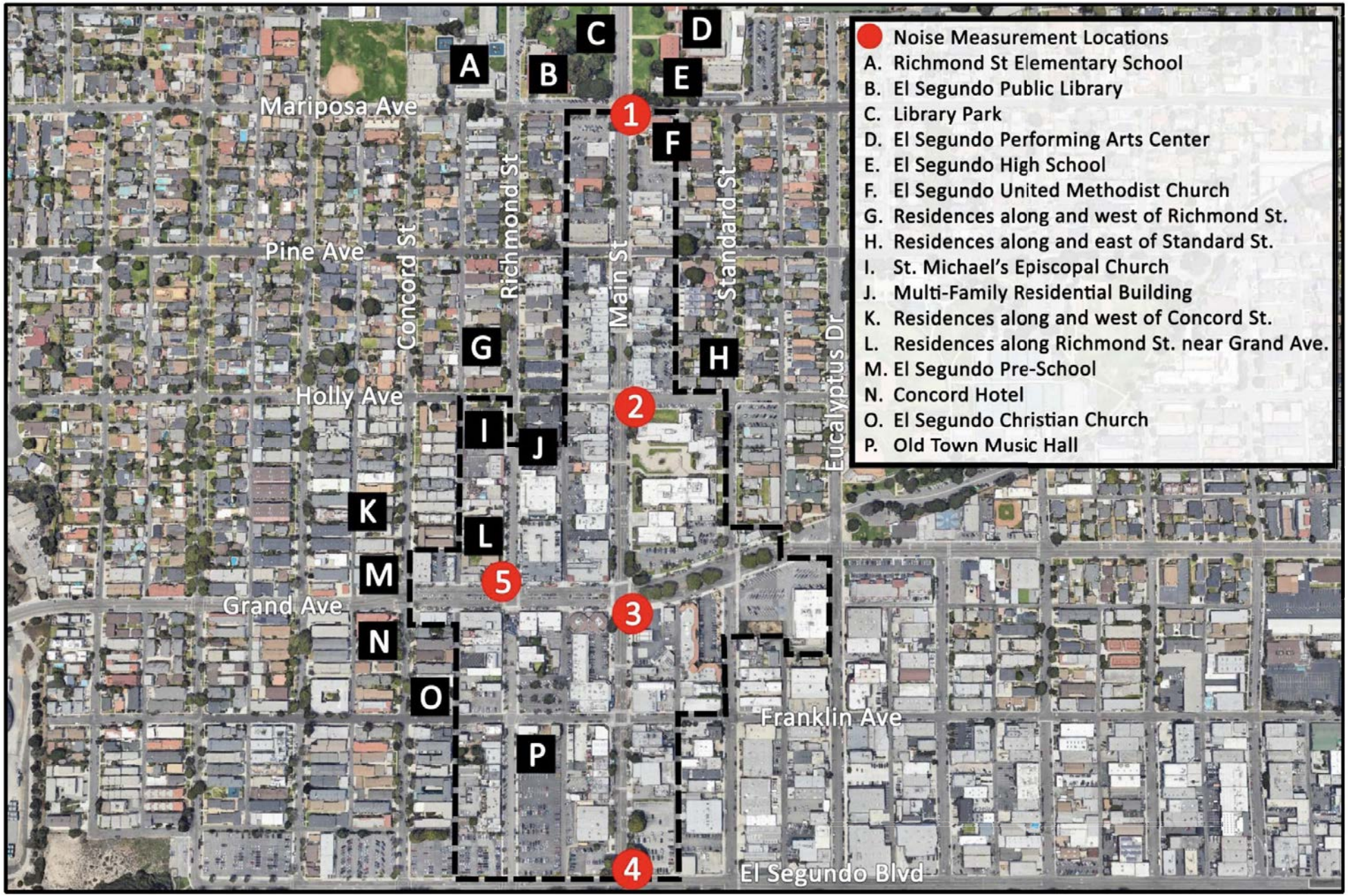
The locations of all identified noise-sensitive receptors are presented in **Figure IV.I-1, Noise Monitoring and Sensitive Receptor Locations**.

In addition to the off-site receptors listed above, the Specific Plan Update would allow for the construction of up to 300 additional residential units within the Specific Plan update area. These residential units could be noise-sensitive receptors to future development under the Project.

c) Ambient Noise Levels

The City's General Plan Noise Element identifies LAX aircraft noise, traffic noise, railway noise, and industrial noise as the major noise sources affecting the City and its inhabitants. The most recent quarterly noise reports released by Los Angeles World Airports (LAWA) show that CNEL values near the Specific Plan Update area range between 62 and 64 dB CNEL.[29] Given the size of the Project area and its orientation relative to LAX's noise contours and noise monitoring locations, it is reasonable to assume that LAX-related noise levels in the Specific Plan Update area are approximately 60 dBA CNEL. The City's General Plan Noise Element shows that noise

[29] *Los Angeles World Airports, Quarterly Noise Reports, https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/California-state-airport-noise-standards-quarterly-reports-and-contour-maps, accessed September 5, 2023.*



Source: Tanski Environmental Consulting, 2023

Figure IV.I-1
Noise Monitoring and Sensitive Receptor Locations

levels from all sources in the Specific Plan Update area, not just LAX, range between 65 and 70 dBA CNEL.[30]

On Thursday, September 7, 2023, noise measurements were obtained at multiple locations within the Specific Plan Update area to aid in the characterization of daytime ambient noise conditions within the Specific Plan Update area. Locations of noise measurements were previously shown above on **Figure IV.I-1, Noise Monitoring and Sensitive Receptor Locations**, and the measured noise levels are shown in **Table IV.I-2, Existing Noise Levels**, below. Descriptions of noise sources are also included for each noise measurement. The measured noise levels are consistent with the determination that ambient noise levels in the Project area range between 65 and 70 dBA CNEL.

Table IV.I-2
Existing Noise Levels

Noise Measurement # and Location	Noise Sources / Notes	Sound Level (dBA L_{eq})
1. Intersection of Main Street and Mariposa Avenue	Traffic along Main Street and Mariposa Avenue. Aircraft also contributed to noise levels. Time of day: 11:51 AM to 12:01 PM.	69.2
2. Intersection of Main Street and Holly Avenue	Traffic along Main Street and Holly Avenue. Aircraft also contributed to noise levels. Amplified music from surrounding commercial/retail uses was audible at times but did not contribute substantially to noise levels. Time of day: 12:05 PM to 12:15 PM.	65.7
3. Intersection of Main Street and Grand Avenue	Traffic along Main Street and Grand Avenue. Aircraft noise was not substantially audible over traffic noises. Time of day: 12:18 PM to 12:28 PM.	66.7
4. Intersection of Main Street and El Segundo Boulevard	Traffic along Main Street and El Segundo Boulevard. Industrial noises from the nearby refinery were clearly audible at all times. Time of day: 12:31 PM to 12:41 PM.	68.0
5. Intersection of Grand Avenue and Richmond Street	Traffic along Grand Avenue and Richmond Street. Some noise from outdoor dining patrons. Time of day: 12:46 PM to 12:56 PM.	62.9

Source: Noah Tanski Environmental Consulting, Noise Study, El Segundo Downtown Specific Plan Update Project, September 13, 2023.

[30] *City of El Segundo, City of El Segundo General Plan, Chapter 9, Noise Element, adopted December 1, 1992, available at: https://www.elsegundo.org/Home/ShowDocument?id=367, accessed September 2023.*

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) Noise Control Act of 1972

Under the authority of the Noise Control Act of 1972, the United States Environmental Protection Agency (USEPA) established noise emission criteria and testing methods published in Parts 201 through 205 of Title 40 of the Code of Federal Regulations (CFR) that apply to some transportation equipment (e.g., interstate rail carriers, medium trucks, and heavy trucks) and construction equipment. In 1974, USEPA issued guidance levels for the protection of public health and welfare in residential areas of an outdoor L_{dn} of 55 dBA and an indoor L_{dn} of 45 dBA.[31] These guidance levels are not standards or regulations and were developed without consideration of technical or economic feasibility. There are no federal noise standards that directly regulate environmental noise related to the construction or operation of a project. Moreover, the federal noise standards are not reflective of urban environments that range by land use, density, proximity to commercial or industrial centers, etc.

(2) Federal Transit Administration Vibration Standards

There are no federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from land use development projects. However, the FTA has adopted vibration criteria for use in evaluating vibration impacts from construction activities.[32] The vibration damage criteria adopted by the FTA are shown in **Table IV.I-3, Construction Vibration Damage Criteria.**

Table IV.I-3
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to groundborne vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

The FTA has also adopted standards associated with human annoyance for determining the groundborne vibration and noise impacts from ground-borne noise on the following three off-site land-use categories: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional.[33] The FTA defines Category 1 as buildings where

[31] *United States Environmental Protection Agency, EPA Identifies Noise Levels Affecting Health and Welfare, April 1974, website: https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html, accessed September 2023.*

[32] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 7-5, page 186, 2018.*

[33] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.*

vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but that still potentially involve activities that could be disturbed by vibration. The vibration thresholds associated with human annoyance for these three land-use categories are shown in **Table IV.I-4, Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment**. No thresholds have been adopted or recommended for commercial or office uses.

Table IV.I-4
Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment

Land Use Category	Frequent Events [1]	Occasional Events [2]	Infrequent Events [3]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB [4]	65 VdB [4]	65 VdB [4]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

1 "Frequent Events" is defined as more than 70 vibration events of the same source per day.
2 "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.
3 "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.
4 This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.
Source: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.

(3) Occupational Safety and Health Act of 1970

Under the Occupational Safety and Health Act of 1970 (29 United State Code (U.S.C.) Sections 1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.[34]

[34] *United States Department of Labor, Occupational Health and Safety Act of 1970, available at https://www.osha.gov/laws-regs/oshact/completeoshact, accessed September 2023.*

b) State

(1) Compatible Land Use

The State of California has not adopted Statewide standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure, as presented in **Table IV.I-5, Guidelines for Noise Compatible Land Use**.[35] The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise levels are divided into four general categories, which vary in range according to land use type: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly

Table IV.I-5
Guidelines for Noise Compatible Land Use

Land Use Category	Noise Exposure (L_{dn} or CNEL, dBA)						
	55	60	65	70	75	80	
Residential – Low Density Single-Family, Duplex, Mobile Home	A	C	N	N	U	U	U
Residential – Multi-Family	A	A	C	N	U	U	U
Transient Lodging – Motel, Hotel	A	A	C	C	N	N	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Amphitheater	C	C	C	C	N	N	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C	N	U
Playground, Neighborhood Park	A	A	A	A	C	N	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	N	U
Office Building, Business, Commercial, Professional	A	A	A	C	C	N	U
Industrial, Manufacturing, Utilities, Agriculture	A	A	A	A	C	N	U

A Normally acceptable. Specified land use is satisfactory, based upon assumption buildings involved are conventional construction, without any special noise insulation.
C Conditionally acceptable. New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.
N Normally unacceptable. New construction or development generally should be discouraged. A detailed analysis of noise reduction requirements must be made and noise insulation features included in the design of a project.
U Clearly unacceptable. New construction or development generally should not be undertaken.
Source: State of California, Governor's Office of Planning and Research, General Plan Guidelines, 2003.

[35] *State of California, Governor's Office of Planning and Research, General Plan Guidelines, page 377, 2023.*

unacceptable." The City has developed its own compatibility guidelines in the Noise Element of the General Plan based in part on OPR Guidelines. California Government Code Section 65302 requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(f) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

The State has also established noise insulation standards for new multi-family residential units, hotels, and motels. These requirements are collectively known as the California Noise Insulation Standards (Title 24 of the California Code of Regulations [CCR]). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. The standards require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

(2) Caltrans Vibration/Groundborne Noise Standards

The State of California has not adopted statewide standards or regulations for evaluating vibration or groundborne noise impacts from land use development projects such as the Project. Although the state has not adopted any vibration standard, Caltrans in its *Transportation and Construction Vibration Guidance Manual* recommends the following vibration thresholds that are more practical than those provided by the FTA. The Caltrans vibration standards for damage potential and human annoyance are shown in **Table IV.I-6, Caltrans Vibration Damage Potential Threshold Criteria** and **Table IV.7, Caltrans Vibration Annoyance Potential Threshold Criteria**, respectively.

Table IV.I-6
Caltrans Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources [1]	Continuous/Frequent Intermittent Sources [2]
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

1 Transient sources create a single, isolated vibration event, such as blasting or drop balls.
2 Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Table 19, April 2020.

Table IV.I-7
Caltrans Vibration Annoyance Potential Threshold Criteria

Human Response	Maximum PPV (in/sec)	
	Transient Sources [1]	Continuous/Frequent Intermittent Sources [2]
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.10
Severe	2.0	0.4

1 Transient sources create a single, isolated vibration event, such as blasting or drop balls.
2 Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Table 19, April 2020.

c) Regional and Local

(1) City of El Segundo General Plan

The policies outlined in the City of El Segundo General Plan Noise Element are considered relevant to the Project, as described below. The Noise Element is intended to be used as a guide in public and private development matters related to outdoor noise. The Noise Element serves as an aid in defining acceptable land uses and as a guideline for compliance with California Noise Insulation Standards.[36] As stated in Government Code Section 65302(f), the ultimate purpose of noise control policies and programs is to "minimize the exposure of community residents to excessive noise."

Goal N1: **Provision of a Noise-Safe Environment.** Encourage a high quality environment within all parts of the City of El Segundo where the public's health, safety, and welfare are not adversely affected by excessive noise.

Objective N1-2: It is the objective of the City of El Segundo to ensure that City residents are not exposed to stationary noise levels in excess of El Segundo's Noise Ordinance standards.

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

Program N1-2.1A: Address noise impacts in all environmental documents for discretionary approval projects, to insure that noise sources meet City Noise Ordinance standards. These sources may include: mechanical or electrical

[36] *City of El Segundo, City of El Segundo General Plan, Chapter 9, Noise Element, adopted December 1, 1992, available at: https://www.elsegundo.org/Home/ShowDocument?id=367, accessed September 2023.*

equipment, truck loading areas, or outdoor speaker systems.

(2) El Segundo Municipal Code

Chapter 7-2 (Noise and Vibration) of the El Segundo Municipal Code (ESMC) represents the City's noise ordinance. As reproduced below, ESMC Section 7-2-4 establishes noise standards for residential, commercial, and residential properties.

> 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 Property: 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 and depend on cumulative duration of minutes within any hour: 30 minutes = 0 dB increase; 15 minutes = 5 dB increase; 5 minutes = 10 dB increase; 1 minute = 15 dB increase; and less than one minute = 20 dB increase allowed.
>
> 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).

According to ESMC Section 7-2-10, construction activities are exempted from the provisions of ESMC Chapter 7-2:

> (D) Construction Noise: Noise sources associated with or vibration created by construction, repair, or remodeling or any real property, provided said activities do not take place between the hours of six o'clock (6:00) PM and seven o'clock (7:00) AM 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 § 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.

Although the allowable construction level is quantified in ESMC Section 7-2-10.D, there is no apparent quantification for an allowable vibration level that "does not endanger the public health, welfare and safety." Additionally, Section 7-2-9 does not quantify an acceptable vibration level, but its usage of "perceptible" as a descriptive term suggests that usage of FTA or Caltrans

guidance would be appropriate for interpreting these vibration descriptors with relevant vibration velocity quantities and metrics.

(3) Proposed Specific Plan

Standards and guidelines set forth in the Specific Plan Update's Development Standards that are relevant for the topic of noise include the following:

Mixed-Use

2.H.4.1. All buildings shall be sited to reduce odor, **noise**, light and glare, and visual and other conflicts between commercial and residential uses.

2.H.4.2. Noise-generating equipment, such as refrigeration units and air conditioning and exhaust fans shall be located away from residential uses.

Service and Delivery

2.H.6.6. Loading or unloading of trucks is prohibited between ten (10) PM and seven (7) AM unless it can be demonstrated that such activities would not exceed the noise limits of the ESMC.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate a project's impacts related to noise are based on Appendix G of the *State CEQA Guidelines*. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to noise would occur if a project would result in:

Threshold (a): ***Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;***

Threshold (b): ***Generation of excessive groundborne vibration or groundborne noise levels; and***

Threshold (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, expose people residing or working in the project area to excessive noise levels.***

b) Analysis of Project Impacts

Threshold (a): ***Would the Project cause generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

(1) Construction

(a) Changes to Land Use Designation and Zoning

By amending the land use designation and zoning on eight parcels within the Specific Plan area, the Downtown Specific Plan Update would facilitate construction of projects within the Specific Plan area through 2040. These projects could occur on any property within the Specific Plan area and affect existing or future land uses located within or surrounding the Specific Plan area, including noise-sensitive receptors such as residential and school land uses. Thus, this analysis broadly addresses the potential for Project implementation to result in temporary construction noise impacts.

Construction of projects facilitated by the Downtown Specific Plan Update would generate noise throughout the implementation period through 2040. This does not mean that all facilitated projects would be under construction simultaneously until 2040; the City conservatively estimates that a maximum 10 percent of buildout allowed under the Project could be under construction in any given year, but there are also likely to be periods in which no construction occurs. The exact location and types of development are not known, but the general location and types of development can be reasonably anticipated. For example, projects would likely be concentrated along Main Street and would consist mainly of low-rise or mid-rise buildings, in accordance with existing and proposed site-development standards for the Project's districts. Construction of these projects would generate noise levels that are typical of demolition, site preparation, grading, building construction, paving, and finishing activities for low-rise and mid-rise buildings. The magnitude of potential construction noise impacts on noise-sensitive receptors would be dependent on project-specific factors that are not known at this time (i.e., proximity to noise-sensitive receptors, intervening barriers/structures, construction intensity, etc.), but given the anticipated building types and construction activities, as well as the City's noise regulations, it is nevertheless possible to estimate noise levels – and assess the significance of noise levels – that would be associated with construction of projects facilitated by the Downtown Specific Plan Update. **Table IV.I-8, Typical Construction Equipment Noise Levels**, presents noise levels associated with typical construction equipment that could be utilized for the construction of future projects facilitated by the Downtown Specific Plan Update.

Table IV.I-8
Typical Construction Equipment Noise Levels

Equipment	Typical Construction Phase	Predicted Noise Levels (dBA L_{eq}) at Distance [1]				
		50 feet	100 feet	150 feet	200 feet	250 feet
Auger Drill Rig	G, BC	77.4	71.3	67.8	65.3	63.4
Backhoe	D, SP, G	73.6	67.6	64.0	61.5	59.6
Compactor	G	76.2	70.2	66.7	64.2	62.3
Compressor (air)	BC, F	73.7	67.7	64.1	61.6	59.7
Concrete Mixer Truck	BC	74.8	68.8	65.3	62.8	60.8
Concrete Pump Truck	BC	74.4	68.4	64.9	62.4	60.4
Crane	BC	72.6	66.6	63.0	60.6	58.6
Dozer	D, SP, G	77.7	71.7	68.1	65.6	63.7
Dump Truck	D, SP, G	72.5	66.5	62.9	60.4	58.5
Excavator	D, SP, G	76.7	70.7	67.2	64.7	62.8
Front End Loader	D, SP, G, BC, P	75.1	69.1	65.6	63.1	61.2
Generator	All Phases	77.6	71.6	68.1	65.6	63.6
Grader	SP, G	81.0	75.0	71.5	69.0	67.0
Jackhammer	D	81.9	75.9	72.4	69.9	67.9
Paver	P	74.2	68.2	64.7	62.2	60.2
Pneumatic Tools	All Phases	82.2	76.1	72.6	70.1	68.2
Roller	G, P	73.0	67.0	63.5	61.0	59.0
Scraper	SP, G	79.6	73.6	70.1	67.6	65.6
Welder	BC	70.0	64.0	60.5	58.0	56.0

Notes: D = demolition; SP = site preparation; G = grading; BC = building construction; F = finishing; P= paving
1 The noise levels shown do not account for ground attenuation factors.
Source: Noah Tanski Environmental Consulting, Noise Study, El Segundo Downtown Specific Plan Update Project, September 13, 2023; Noise levels derived from the Federal Highway Administration, Roadway Construction Noise Model, Version 1.1.

Actual construction noise levels would likely be highly variable, depending on a wide range of project-specific factors. For example, some projects could involve extensive demolition and grading that would require intensive use of several loud, heavy-duty earthmoving vehicles such as dozers, excavators, and graders. Other projects could be renovation projects that would not involve demolition or grading vehicles at all. Some projects could be located directly adjacent to sensitive receptors, and other projects could be hundreds of feet away from sensitive receptors. For all projects, construction noise levels at surrounding noise-sensitive receptors would fluctuate depending on equipment distances from these receptors. For example, noise levels would be greater when equipment operates in proximity of sensitive receptors and lower when equipment is positioned farther away.

Regardless of the type and location of future projects, and irrespective of the other factors discussed above, the City would review individual development proposals for compliance with applicable noise control requirements. El Segundo Municipal Code Section 7-2-10(D) establishes that construction activities occurring between 7:00 A.M. and 6:00 P.M. Monday through Saturday (except federal holidays) shall not exceed a noise standard of 65 dBA, plus the limits specified in § 7-2-4C. Construction activities occurring outside these hours would be subject to the more stringent noise standards imposed by Section 7-2-4, which include a 5 dBA over ambient threshold for residential land uses. Further, Section 7-2-13 establishes limits to ensure that noise levels do not reach levels capable of posing a threat to health or welfare. Compliance with these

requirements, as well as the application of regulatory compliance measures for future projects in the planning area as necessary (e.g., temporary noise barriers for construction near sensitive residential receptors, use of quieter equipment, etc.), would ensure that future development does not expose noise-sensitive receptors to substantial noise increases from construction. The reasoning is as follows:

- First, as discussed earlier, existing ambient noise levels within the Specific Plan area are in excess of 65 dBA CNEL. The 65-dBA noise limit established by El Segundo Municipal Code Section 7-2-10(D) aligns well with these existing conditions: by prohibiting substantial exceedances of the 65-dBA noise limit, Section 7-2-10(D) would also prohibit substantial exceedances of existing noise conditions at receptors during the regulated hours.

- Second, construction occurring outside the regulated hours, while unlikely, would be subject to the more stringent 5 dBA over ambient standard established by Section 7-2-4, which would also prohibit substantial exceedances of existing noise conditions at receptors.

- Third, notwithstanding the Section 7-2-10(D) and Section 7-2-4 noise standards, Section 7-2-13 would also ensure that construction noise levels do not reach levels associated with noise-induced hearing loss.

Thus, the City's noise standards and future projects' compliance therewith, as well as the application of regulatory compliance measures and project design features for future projects in the planning area as necessary (e.g., temporary noise barriers for construction near sensitive residential receptors, use of quieter equipment, etc.) would ensure that noise-sensitive receptors are protected against substantial noise increases from construction activities. As such, this impact would be less than significant.

(b) Transportation and Mobility Enhancements

The Specific Plan Update also recommends the following transportation and mobility enhancements:

- Pedestrian crossing enhancements at 12 locations;
- Area-wide sidewalk curb ramp enhancements;
- Sidewalk widening along three streets;
- Bicycle mobility enhancements on two roadway segments;
- Area-wide bicycle accommodation and wayfinding enhancements;
- Bus stop enhancements at six existing bus stops;
- Signal operation enhancements on two roadway segments;
- Area-wide intersection control improvements (signage and striping);
- In-road bollard receptacles for temporary street closures at two locations;
- Area-wide on-street parking striping enhancements; and
- Area-wide off-street parking optimization enhancements.

Limited details are available pertaining to the construction requirements of these proposed enhancements, but, as discussed above, construction of the enhancements would be required to comply with applicable noise control requirements, namely the noise limits established by El Segundo Municipal Code Section 7-2-10(D), Section 7-2-4, and Section 7-2-13. As explained above, these noise standards and the enhancements' compliance therewith would ensure that noise-sensitive receptors would be protected against substantial noise increases from related construction activities. As a result, impacts related to construction of these proposed transportation and mobility enhancements would also be less than significant and no mitigation would be required.

(2) Operation

(a) Stationary Noise Sources

Operations of the proposed retail, restaurant, office, medical office, and residential land uses could involve stationary sources such as (but not limited to):

- Landscaping/maintenance equipment
- HVAC systems
- Loading docks
- Trash compactors
- Parking lots
- Outdoor dining areas
- Outdoor residential open space/amenity areas (e.g., balconies, pool decks, etc.)

The exact location and types of development that would be facilitated by the Downtown Specific Plan Update are not known. Like construction, the magnitude of potential stationary source noise impacts on noise-sensitive receptors would be dependent on project-specific factors that are not known at this time (e.g., proximity to noise-sensitive receptors, the size or number of stationary sources, etc.). Despite this, many factors support that the stationary noise sources associated with future development would not result in substantial noise increases at noise-sensitive receptors. First, these noise sources are already present within the Specific Plan area, which contains existing commercial, retail, and residential uses. The Project would not introduce substantially different uses and accompanying stationary noise sources (e.g., industrial uses, etc.) to the Specific Plan area. Second, the types of commercial, retail, and residential uses that would be facilitated by the Downtown Specific Plan Update and their common stationary noise sources are not associated with substantial noise levels. For example, sources such as landscaping/maintenance equipment, non-industrial loading docks, and trash compactors generate noise on an intermittent basis and have a limited effect on daily ambient noise conditions. Sources such as HVAC systems, parking lots, and outdoor gathering areas are more continuous but generate modest noise levels that are consistent with existing conditions and ambient noise levels within the Specific Plan area. Third, future projects and noise from their stationary sources would be subject to review for compliance with the City's applicable noise control requirements. During this time, the City would evaluate conditions specific to the future projects, determine if the stationary noise sources being proposed could result in exceedances of

the City's noise standards or other significant effects, and, if necessary, incorporate regulatory compliance measures and project design features to ensure that stationary noise sources do not exceed the standards set forth in ESMC Title 7, Chapter 2.4 when measured on a property. Notably, noise sources would be evaluated for compliance with the City's noise standards, specifically those established by El Segundo Municipal Code Section 7-2-4 and Section 7-2-8. For example, Section 7-2-4 would prohibit future projects from exceeding ambient noise levels at noise-sensitive residential properties by more than 5 dBA, with limited adjustments. Thus, existing ambient noise conditions at noise-sensitive residential properties would be protected against substantial noise increases. Section 7-2-8 would additionally prohibit certain loud activities from occurring during noise-sensitive evening and early morning hours. Given these considerations and the City's existing noise regulations, significant noise impacts from stationary noise sources would not occur under implementation of the Project, and this impact would be less than significant. No mitigation would be required.

(b) Mobile Noise Sources

The Downtown Specific Plan Update amends the land use designation and zoning on eight parcels within the Specific Plan area, and relaxes parking requirements and density limits, which would facilitate construction of projects within the Specific Plan area through 2040. The exact location and types of projects that would be facilitated by the Project are not known, and the magnitude of potential traffic-related noise impacts would be dependent on project-specific factors that are also not known at this time (e.g., proximity to noise-sensitive receptors, land use type and size, trip generation rates, etc.). However, based on the Project's estimated trip generation and distribution, it is not anticipated that the Downtown Specific Plan Update would result in substantial noise increases from traffic generated by future projects implemented under the Specific Plan Update.

In its Local Transportation Assessment of the Project, Fehr and Peers has estimated traffic that would result from full buildout of the Project's allowable increases in retail, restaurant, office, medical office, and residential land uses within the Specific Plan area.[37] Noise levels associated with this traffic were estimated using the FHWA's Traffic Noise Model version 2.5 (TNM 2.5). This noise prediction software uses traffic volumes, vehicle mix, average speeds, roadway geometry, and other inputs to estimate traffic-related noise levels along roadway segments. The Project's estimated peak hour traffic-related noise levels along roadways within the Specific Plan area are shown below in **Table IV.I-9, Traffic Noise Levels from Full Project Buildout**. As shown, the Project's traffic-related noise levels on surrounding roadways (i.e., noise that would be associated with the Project's vehicle trips only) would be no greater than 57 dBA Leq during the busiest peak hours. Given that existing noise levels within the Specific Plan area exceed 65 dBA CNEL, this demonstrates that noise increases resulting from Project-related traffic would be nominal – fractions of a decibel and below the 3 dBA CNEL threshold of significance that represents a barely perceptible change (for example, 57 dBA + 65 dBA = 65.6 dBA). As a result, the Project's traffic-related noise impact would be less than significant and no mitigation would be required.

[37] *Fehr and Peers, Local Transportation Assessment for the El Segundo Downtown Specific Plan Update, November 2023.*

Table IV.I-9
Traffic Noise Levels from Full Project Buildout

Roadway Segment	Traffic Noise Level (dBA L_{eq})	
	AM Peak Hour	PM Peak Hour
Main Street, north of Mariposa Avenue	55.5	57.0
Main Street, south of Mariposa Avenue	55.4	56.7
Main Street, north of Grand Avenue	55.0	56.2
Main Street, south of Grand Avenue	53.2	54.7
Main Street, north of El Segundo Boulevard	51.8	53.6
Mariposa Avenue, west of Main Street	45.1	48.1
Mariposa Avenue, east of Main Street	43.8	45.1
Grand Avenue, west of Main Street	54.8	56.2
Grand Avenue, east of Main Street	54.1	55.8
El Segundo Boulevard, east of Main Street	52.1	53.6

Source: Modeling by: Noah Tanski Environmental Consulting, Noise Study, El Segundo Downtown Specific Plan Update Project, September 13, 2023; Traffic data provided by: Fehr and Peers, Local Transportation Assessment for the El Segundo Downtown Specific Plan Update, November 2023.

Threshold (b): Would the Project cause generation of excessive groundborne vibration or groundborne noise levels?

(1) Construction-Related Groundborne Vibration

Construction of projects and improvements facilitated by the Downtown Specific Plan Update would generate groundborne vibration from the operations of construction equipment. **Table IV.I-10, Typical Construction Equipment Groundborne Vibration Levels**, presents groundborne vibration levels associated with typical construction equipment that could be utilized for the construction of future projects facilitated by the Downtown Specific Plan Update.

Table IV.I-10
Typical Construction Equipment Groundborne Vibration Levels

Equipment	Groundborne Vibration Level (in/sec PPV) at Distance				
	25 feet	50 feet	75 feet	100 feet	125 feet
Vibratory Roller	0.210	0.098	0.063	0.046	0.036
Large Bulldozer	0.089	0.042	0.027	0.019	0.015
Small Bulldozer	0.003	0.001	0.001	0.001	0.001
Auger Drill	0.089	0.042	0.027	0.019	0.015
Loaded Truck	0.076	0.035	0.023	0.017	0.013
Jackhammer	0.035	0.016	0.010	0.008	0.006
Impact Pile Driver (Upper Range)	1.518	0.708	0.453	0.330	0.258
Impact Pile Driver (Typical)	0.644	0.300	0.192	0.140	0.110
Vibratory Pile Driver (Upper Range)	0.734	0.342	0.219	0.160	0.125
Vibratory Pile Driver (Typical	0.170	0.079	0.051	0.037	0.029

Source: Noah Tanski Environmental Consulting, Noise Study, El Segundo Downtown Specific Plan Update Project, September 13, 2023; Groundborne vibration levels derived from reference groundborne vibration levels provided by California Department of Transportation, 2020 Transportation and Construction Vibration Guidance Manual and the Federal Transit Authority, 2018 Transit Noise and Vibration Impact Assessment Manual.

As shown, certain construction equipment is capable of generating groundborne vibration levels that exceed Caltrans criteria for building damage or severe human annoyance (see **Table IV.I-7** and **Table IV.I-8**, respectively). Actual groundborne vibration levels generated by construction

activities would likely be highly variable, depending on a wide range of project-specific factors. For example, some projects would require intensive use of bulldozers or other grading equipment that is the vibrational equivalent of bulldozers. Other projects could be renovation projects that would not require this type of grading equipment. Some projects could be located directly adjacent to structures that are more sensitive to groundborne vibration, and other projects could be over 100 feet from vibration-sensitive structures.

The City would review individual development proposals for compliance with El Segundo Municipal Code Section 7-2-10(D), which prohibits construction-related groundborne vibration levels that endanger the public health, welfare, and safety. Compliance with regulatory requirements and project design features, would ensure that future projects would not expose buildings to potentially damaging levels of groundborne vibration or levels capable of causing severe human annoyance. In other words, the City's groundborne vibration standards and future projects' compliance therewith would ensure that buildings and people would be protected against substantial groundborne vibration levels from construction activities. As a result, this impact would be less than significant and no mitigation would be required.

(2) Operations-Related Groundborne Vibration

The Project does not propose or allow for the implementation of land uses or improvements that are typically associated with significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operations of the retail, restaurant, office, medical office, and residential uses would not contain such vibration sources. Notwithstanding, El Segundo Municipal Code Section 7-2-9 prohibits the generation of groundborne vibration that is perceptible without instruments, which would ensure that future projects would be prohibited from exposing buildings to potentially damaging levels of groundborne vibration or levels capable of causing human annoyance. As a result, this impact would be less than significant and no mitigation would be required.

Threshold (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, expose people residing or working in the project area to excessive noise levels?

As discussed in **Section V, Other CEQA Considerations, 5. Effects Found Not to be Significant** and the Initial Study (**Appendix A.2** of the Draft EIR), the Specific Plan area is located less than 3,000 feet south of LAX (approximately 0.55-mile), but only a small portion of the Specific Plan area is located within the LAX Airport Influence Area, or "AIA" (specifically, three parcels south of Mariposa Avenue along Main Street),[38] and the Specific Plan area is located outside the airport's 65-dBA CNEL noise contours.[39] State planning standards consider all land

[38] *County of Los Angeles, Airport Influence Area for Airports in Los Angeles County, last updated August 3, 2023, available at https://data.lacounty.gov/datasets/lacounty::airport-influence-area-1/explore?location=33.922920%2C-118.415184%2C16.00, accessed September 15, 2023.*

[39] *Los Angeles World Airports, Quarterly Noise Reports, https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/California-state-airport-noise-standards-quarterly-reports-and-contour-maps, accessed September 5, 2023.*

uses with noise levels from airport operations less than 65 dBA CNEL to be compatible with aircraft operations.

The project is a revision to the existing El Segundo Downtown Specific Plan. As all areas of the Specific Plan area are essentially built-out, all future development would be infill and/or replacement of existing uses. As future development would only occur on sites currently or previously developed, impacts resulting from construction of new development would be similar as under current conditions. Furthermore, as detailed in **Section IV.G, Hazards and Hazardous Materials**, of this EIR, the Los Angeles County Airport Land Use Commission has reviewed the proposed Specific Plan Update for potential conflicts with the applicable airport land use plan, including exposure to aircraft noise, and confirmed that the Specific Plan area, including the three parcels located within the AIA for LAX, are located "well south of the existing 65 CNEL noise contours" and determined that the "proposed changes in the Specific Plan Update are of a nature that do not warrant impacts of concern to ALUC."[40] In addition, development under the Specific Plan does not propose construction of new or relocation or expansion of existing airport facilities that would create new or alter existing airport noise contours. Therefore, the Project would not expose people residing or working in the project area to excessive noise levels associated with airports, and this impact would be less than significant.

5. Cumulative Impact Analysis

a) Increases in Ambient Noise Levels

(1) Construction

Future development that would be supported by the Specific Plan Update would result in temporary noise increases during construction activities, as discussed above under Impact Analysis IV.I.4(a). The construction period of future developments would have the potential to overlap with the construction of other development projects in the City; however, as with future projects under the Specific Plan Update, unrelated development projects within its vicinity would all be subject to applicable noise standards (descriptions of the standards applicable within the City of El Segundo are described throughout this section).

Furthermore, due to attenuation of noise over distance and the presence of physical barriers (i.e., intervening buildings and topography), noise due to construction of other projects would not meaningfully combine with future development under the Project to produce a cumulative noise effect during construction. By way of illustration, if there are two concurrent construction projects of comparable sound emission intensity, and the activity nearest to a studied noise-sensitive receptor is compliant with the aforementioned City threshold for construction noise as received by a residential property, the other activity could be no closer than three times the distance of the receptor to the nearest activity and not make a cumulatively measurable contribution to the total

[40] *Los Angeles County, Airport Land Use Commission, Personal Communication Letter, Subject: Downtown Specific Plan Update, City of El Segundo, signed Bruce Durbin, Supervising Regional Planner, Ordinance Studies/ALUC Section, dated September 26, 2023.*

noise exposure level. If two concurrent projects were close to a receptor, the cumulative noise would be one of the following:

- The louder (in dBA) of the two concurrent activities; or,
- A logarithmic sum of the two activity noise levels that, per acoustic principles, cannot be more than 3 dBA greater than the louder of the two individual noise-producing activities.

In sum, cumulative construction noise is likely to be dominated by the closest or loudest activity to the receptor, and the combination will be no more than a barely perceptible difference (i.e., up to a 3-dB change). On this basis, and because noise impacts with respect to relevant standards are predicted to be less than significant, the Project would not contribute to cumulative exceedances of noise standards, and its incremental effect would be a less-than-significant impact.

(2) Operation

(a) Stationary Sources

Noise from operation of stationary electro-mechanical equipment added to the outdoor ambient sound environment as a result of Project implementation would include permanent on-site noise sources (e.g., rooftop HVAC equipment) as addressed in the Impacts Analysis, under Threshold IV.I.4(a). A cumulative impact could occur if noise produced from such sources due to implementation of the Project were to combine with noise produced from the operation of other unrelated projects in the vicinity to create a cumulatively significant permanent increase in ambient noise levels. However, noise emission from HVAC equipment attenuates with distance and can be occluded by structures and terrain. Additionally, the operation of future projects under the Project, along with the operation of other unrelated projects, would be subject to applicable requirements from the City's noise ordinance, which limits the exterior noise levels at residences. Hence, for these two reasons, cumulative impacts to outdoor ambient noise levels resulting from Project stationary sources would be less than significant.

(b) Mobile Sources

Future development from implementation of the Project along with other unrelated projects would generate off-site traffic noise. However, the analysis determined that Project-related traffic, assuming full buildout of the Project's allowable uses, would not increase traffic-related noise levels within the Specific Plan area by greater than 0.6 dBA (as compared to existing noise conditions that are no less than 65 dBA CNEL). This is well below a barely perceptible difference (i.e., up to a 3-dB change), demonstrating that the incremental effect of the Project's off-site traffic noise would not be cumulatively considerable, especially because the Project's effect on future noise conditions would be similar or less than this maximum 0.6 dBA increase. Cumulative off-site traffic noise impacts would therefore be less than significant.

b) Vibration

Construction-related vibration from future development under the Project was addressed under Threshold IV.I.4(b) above. Other foreseeable projects within the vicinity of the Project site would not be close enough to create a combined excessive generation of groundborne vibration. Further, even when sources are close together, the presence of multiple vibration sources rarely results in cumulative increases in groundborne vibration levels. Generally, additional vibration sources result in additional vibration peaks (i.e., PPV groundborne vibration signals or events), not necessarily higher (i.e., more damaging or intense) peaks, because the probabilities of constructive wave interference are extremely small. Therefore, cumulative impacts associated with excessive groundborne vibration would be less than significant.

c) Airport Noise

Aircraft-related noise impacts occur only in the vicinity of airports or airstrips. Although Citywide growth could increase the number of people who are exposed to aircraft-related noise impacts, such impacts would be localized in nature. In addition, new development would not increase aircraft-related noise impacts. Because no portion of the Specific Plan area is located within the 65 dBA CNEL noise contour for LAX or any other airport, the Project would have no contribution to any cumulative impact related to these hazards. For these reasons, the incremental effect of the Project related to airport and air strip noise would not be cumulatively considerable and cumulative impacts would be less than significant.

6. Mitigation Measures

Project-level and cumulative impacts with regard to noise would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to noise would be less than significant.

8. References

California Department of Transportation, 2020 Transportation and Construction Vibration Guidance Manual, 2020.

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California Department of Transportation, Transportation and Construction Vibration Guidance Manual, April 2020.

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County of Los Angeles, Airport Influence Area for Airports in Los Angeles County, last updated August 3, 2023.

Federal Highway Administration, Roadway Construction Noise Model, Version 1.1.

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Fehr and Peers, Local Transportation Assessment for the El Segundo Downtown Specific Plan Update, November 2023.

Los Angeles World Airports, Quarterly Noise Reports.

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State of California, Governor's Office of Planning and Research, General Plan Guidelines.

United States Department of Labor, Occupational Health and Safety Act of 1970.

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World Health Organization, edited by Berglund, Birgitta, Lindvall, Thomas, Schwela, Dietrich H. Guidelines for Community Noise, 1999.

IV. Environmental Impact Analysis

J. Population and Housing

1. Introduction

This section describes the existing population and housing conditions within the El Segundo Downtown Specific Plan Update (Project) site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, level of significance, and references. Information contained in this section is based on local and regional forecasts of the Project area from the U.S. Census Bureau, Southern California Association of Governments (SCAG), and the City of El Segundo General Plan. Because the most recent U.S. Census Bureau data was obtained for 2020 and the Census is conducted every 10 years, all population, housing, and employment data is based on projections and should be considered as an estimate. Other sources consulted are listed in **Section IV.J.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Existing Population, Housing, and Employment Data

(1) Southern California Association of Governments Region Overview

The City of El Segundo (City) is located within the jurisdiction of Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and State law, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Regional Housing Needs Assessment (RHNA), in coordination with other State and local agencies. These documents include population, employment, and housing projections for the region and its 15 subregions. The City

of El Segundo is located within the Los Angeles Subregion. At the time of the issuance of the Notice of Preparation (NOP), the applicable regional growth forecasts were included in SCAG's 2020–2045 RTP/SCS, (also referred to as Connect SoCal), which was adopted September 3, 2020.

Connect SoCal is a long-range planning document that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable regional growth pattern. Over 4,000 individual transportation capital projects and programs through 2045, advanced through local and countywide plans, form the foundation of Connect SoCal. The implementation of the plan is anticipated to generate and support 168,400 annual jobs stemming from direct transportation investments and 264,500 jobs annually from the enhanced economic competitiveness that infrastructural improvements will provide.[1]

According to SCAG, for the purpose of determining consistency with Connect SoCal, for CEQA lead agencies (such as local jurisdictions) have the sole discretion to determine a local project's consistency; consistency should be evaluated utilizing the goals and policies of Connect SoCal and its associated Program EIR (PEIR). Connect SoCal does not supersede or otherwise affect local jurisdiction authority or decisions on future development, including entitlements and development agreements. There is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with Connect SoCal.[2]

A combination of forecasts for population, households, and employment within the SCAG region and Los Angeles County, as included in Addendum #1 to the PEIR for the Connect SoCal, dated September 2, 2020, are presented below in **Table IV.J-1, SCAG Regional Population, Households, and Employment Forecasts**.

Table IV.J-1
SCAG Regional Population, Households, and Employment Forecasts

	2020	2045	Total Change	Percent Change
SCAG Region				
Population	19,518,000	22,504,000	2,986,000	15%
Households	6,333,000	7,633,000	1,300,000	21%
Employment	8,695,000	10,049,000	1,354,000	16%
Los Angeles County				
Population	10,407,000	11,674,000	1,267,000	12%
Households	3,472,000	4,119,000	647,000	19%
Employment	4,838,000	5,382,000	544,000	11%

Source: Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, Table 13, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed March 2023.

[1] *Southern California Association of Governments, 2020-2045 RTP/SCS, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed March 2023.*

[2] *Southern California Association of Governments, 2020-2045 RTP/SCS, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed March 2023.*

According to the Connect SoCal data, on a national level, population growth has slowed, with the U.S. Census Bureau projecting a decrease in national annual growth rate from about 0.86 percent during the years 2000-2016 to approximately 0.57 percent for the years 2016-2045. In the SCAG region, growth is similarly slowing down, from about 0.82 percent during the years 2000-2016 to approximately 0.61 percent for the years 2016-2045. While growth rates are at a historic low; an increase to the total population is expected. In the SCAG region, a 0.6 percent annual growth rate corresponds to about 114,000 new residents annually, or 3.0 million new residents between 2020 and 2045. For Los Angeles County, a total population increase of 12 percent is anticipated between 2020 and 2045.[3]

b) County and City Demographic Overview

(1) Population Growth

Table IV.J-2, City and County Resident Growth and Forecasts 2016-2045, presents historic data and projections for resident growth in the City of El Segundo (City) and Los Angeles County (County) between 2016 and 2045 based on projections from SCAG's Connect SoCal. In addition, the total number of residents in the City and County that were counted in the 2020 U.S. Census are included in **Table IV.J-2, City and County Resident Growth and Forecasts 2016-2045**.

Table IV.J-2
City and County Resident Growth and Forecasts 2016–2045

Year	City of El Segundo Total Residents	County of Los Angeles Total Residents
U.S. Census[a]		
2020	17,272	10,014,009
SCAG's Connect SoCal[b]		
2016	16,700	10,110,000
2045	17,200	11,674,000
Forecasted Change 2016–2045	500	1,537,000
Total Percentage Change 2016–2045	3.0%	15.2%
Average Annual Percentage Change 2016–2045	0.1%	0.5%

a U.S. Census Bureau, QuickFacts: El Segundo City and Los Angeles County, website: https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia,elsegundocitycalifornia,US/POP010220. Accessed August 2023.

b Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, Tables 13 and 14, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed August 2023.

As shown in **Table IV.J-2**, **City and County Resident Growth and Forecasts 2016-2045,** the City's projected total and incremental annual rate of resident growth is substantially lower than Los Angeles County's growth rate when compared over the same time period. According to

[3] *Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, Table 13, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed March 2023.*

SCAG's projections, there will be an increase of 500 residents in the City of El Segundo between 2016 and 2045.

(2) Household Growth

Table IV.J-3, City and County Household Growth and Forecasts 2016-2045, presents historic data and projections in the City's and Los Angeles County's households between 2016 and 2045, based on data from the U.S. Census Bureau and SCAG's Connect SoCal. In addition, the U.S. Census Bureau's 5-year household estimates from the community survey are included in **Table IV.J-3, City and County Household Growth and Forecasts 2016-2045**.

Table IV.J-3
City and County Household Growth and Forecasts 2016–2045

Year	City of El Segundo Total Households	County of Los Angeles Total Households
U.S. Census[a]		
2017-2021[b]	7,070	3,342,811
SCAG's Connect SoCal[c]		
2016	7,000	3,319,000
2045	7,300	4,119,000
Forecasted Change 2016–2045	300	800,000
Total Percentage Change 2016–2045	4.3%	24.1%
Average Annual Percentage Change 2016–2045	0.1%	0.8%

[a] *U.S. Census Bureau, QuickFacts: El Segundo City and Los Angeles County, website: https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia,elsegundocitycalifornia,US/POP010220. Accessed August 2023.*
[b] *Span of years represents the U.S. Census Bureau, American Community Survey (ACS) and Puerto Rico Community Survey, 5-Year Estimates.*
[c] *Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, Tables 13 and 14, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed August 2023.*

As shown in **Table IV.J-3**, **City and County Household Growth and Forecasts 2016-2045,** the City's projected total and incremental annual rate of household growth is substantially lower than Los Angeles County's growth rate when compared over the same time period. According to SCAG, an increase of 300 households are forecasted in the City of El Segundo between 2016 and 2045.

(3) Employment Growth

Table IV.J-4, City and County Employment Growth and Forecasts 2016-2045, presents historic data and forecasts of employment in the City and Los Angeles County between 2016 and 2045 based on data from SCAG's Connect SoCal.

Table IV.J-4
City and County Employment Growth and Forecasts 2016–2045

Year	City of El Segundo Total Employment	County of Los Angeles Total Employment
***SCAG's Connect SoCal*[a]**		
2016	48,300	4,743,000
2045	52,400	5,382,000
Forecasted Change 2016–2045	4,100	639,000
Total Percentage Change 2016–2045	8.5%	13.5%
Average Annual Percentage Change 2016–2045	0.3%	0.5%

[a] *Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, Tables 13 and 14, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed August 2023.*

As shown in **Table IV.J-4**, **City and County Employment Growth and Forecasts 2016-2045,** the City's projected total and incremental annual growth rate in employment is substantially lower than Los Angeles County's growth rate in employment over the same time period. According to SCAG, a total of 4,100 new jobs are anticipated to be added to the City between 2016 and 2045.

c) El Segundo General Plan

(1) General Plan Buildout

The City's General Plan includes buildout projections for the City based on the land use designations. Specifically, the Housing Element of the General Plan presents demographic information that is used to project the City's future housing needs. **Table IV.J-5, 1992 General Plan Buildout Projections for 2010**, includes the General Plan's 2010 buildout projections for population, dwelling units, and non-residential square footage.

Table IV.J-5
1992 General Plan Buildout Projections for 2010

City of El Segundo	2010
Population	17,269
Dwelling Units	7,842
Non-Residential Square Footage	57,773,771

Source: City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023. City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed March 2023.

As shown in **Table IV.J-5**, **1992 General Plan Buildout Projections for 2010,** the 1992 General Plan buildout projections of 17,269 persons were higher than the actual U.S. Census Bureau data of 16,656 persons from 2010. The 2016 and 2045 population projections for the City of El Segundo as set forth in the Connect SoCal as shown in **Table IV.J-2**, **City and County Resident Growth and Forecasts 2016-2045**, (16,700 and 17,200 persons, respectively) indicate that the City is not expected to meet the population growth projections set forth in the General Plan until

after 2045. Therefore, it is anticipated that SCAG's estimate of the number of residents in 2045 is probably low (this is discussed further in Section 4.b (Threshold (a) Operational Impacts) below).

(2) Housing Element and Regional Housing Needs Allocation

The City's 1992 General Plan projected demographic information for the year 2010. In 2022, the City updated the Housing Element of the General Plan. The 2021-2029 Housing Element of El Segundo's General Plan sets forth the City's strategy to preserve and enhance the community's residential character, expand housing opportunities for all economic segments, and provide guidance and direction for local government decision-making in all matters relating to housing. The Housing Element states there were approximately 7,463 residential units in the City in 2020. The average household size estimated for 2018 was 2.53 persons per household.[4]

The Housing Element also states that the City's daytime employment of 48,300 in 2016 (according to SCAG) was estimated to reach 52,400 by 2045, which was included in SCAG's 2020 RTP/SCS Integrated Growth Forecasts.

State law requires that a community provide an adequate number of residential sites to allow for and facilitate production of the City's regional share of housing. To determine whether the City has sufficient land to accommodate its share of regional housing needs for all income groups, the City must identify "adequate sites." Government Code Section 65583 provides that adequate sites are those with appropriate zoning and development standards, with services and facilities, needed to facilitate and encourage the development of a variety of housing for all income levels. Compliance with this requirement is measured by the jurisdiction's ability to provide adequate land to accommodate the Regional Housing Needs Allocation (RHNA).[5]

SCAG is responsible for allocating the RHNA to individual jurisdictions within the region. The RHNA is distributed by income category for the 2021-2029 Housing Element. While the Housing Element covers the planning period of October 15, 2021 through October 15, 2029, the RHNA planning period is slightly different – June 30, 2021 through October 12, 2029 (i.e., 2021–2029 RHNA).

The City of El Segundo's RHNA allocation was 521 total units[6] and distributed as follows:

- Extremely Low Income (up to 30% of Area Median Income [AMI]): 103 units (19.8%)
- Very Low Income (31% to 50% of AMI): 104 units (20.0%)
- Low Income (51% to 80% of AMI): 99 units (16.1%)

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[4] *City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023.*

[5] *City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023.*

[6] *This includes the 5th Cycle Housing Element shortfall of 18 extremely/very low and 11 low income units (total shortfall is 29 units).*

- Moderate Income (81% to 120% of AMI): 84 units (25.1%)
- Above Moderate Income (more than 120% of AMI): 131 units (41%)

As stated in the City's Housing Element, the City has a RHNA allocation of 207 very low income units (inclusive of extremely low income units). Pursuant to State law (AB 2634), the City must project the number of extremely low income housing needs based on Census income distribution or assume 50% of the very low income units as extremely low. Assuming an even split, the City's RHNA allocation of 207 very low income units may be divided into 104 very low (20 percent) and 103 extremely low (19.8 percent) income units.[7]

(a) Jobs/Housing Balance

A jobs/housing balance is a ratio that indicates the number of available jobs in the City compared to the number of available housing units. The ratio is one potential indicator of a community's ability to reduce commuter traffic and overall vehicle miles traveled (VMT) by maintaining a balance between employment and housing in close proximity (e.g., within the City limits).

As stated in the City's Housing Element of the General Plan, a general measure of the balance of a community's employment opportunities with the needs of its residents is through a "jobs–housing balance" test.[8] A balanced community would have a match between employment and housing opportunities so that most of the residents could also work in the community. Connect SoCal provides the data required to calculate the City's jobs-housing balance, as shown in **Tables IV.J-3** and **IV.J-4**. Assuming a 2016 housing stock of 7,000 units and a 2016 employment of 48,300 jobs, the City maintained a 6.9:1 jobs to housing ratio in the City, which translates to being a jobs-rich community. Assuming a 2045 housing stock of 7,300 and a 2045 employment of 52,400, the City would maintain a 7.2:1 jobs to housing ratio in the City, which also translates to being a jobs-rich community.[9]

3. Relevant Plans, Policies, and Ordinances

a) Federal

There are no federal programs, policies, or regulations related to population or housing that are applicable to the Project.

[7] *City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023.*

[8] *City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023.*

[9] *Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, Tables 13 and 14, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed March 2023.*

b) State

(1) Housing Element Law: California Government Code Section 65583 and 655849(a)(1) (AB-2158)

Section 65583 of the California Government Code requires cities and counties to prepare a housing element, as one of the state-mandated elements of the General Plan, with specific direction on its content. Pursuant to Section 65584(a)(1) the California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), SCAG being the COG serving the Southern California area. HCD prepares an initial housing needs assessment and then coordinates with each COG in order to arrive at the final regional housing needs assessment. To date, there have been four previous housing element update "cycles." California is now in its fifth "housing-element update cycle."

(2) The Sustainable Communities and Climate Protection Act of 2008 (SB 375, Steinberg)

SB 375 focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill (AB) 32. SB 375 requires Metropolitan Planning Organizations (MPO) to develop a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP), with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. As set forth in SB 375, the SCS must: (1) identify the general location of land uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need; (4) identify a transportation network to service the regional transportation needs; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; (6) consider the state housing goals; (7) establish the land use development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, will reduce GHG emissions from automobiles and light-duty trucks to achieve GHG emission reduction targets set by the California Air Resources Board (CARB), if there is a feasible way to do so; and (8) comply with air quality requirements established under the Clean Air Act.

Existing law requires local governments to adopt a housing element as part of their general plan and update the housing element as frequently as needed and no less than every five years. Under SB 375, this time period has been lengthened to eight years and timed so that the housing element period begins no less than 18 months after adoption of the RTP, to encourage closer coordination between housing and transportation planning. SB 375 also changes the implementation schedule required in each housing element. Previous law required the housing element to contain a program that set forth a five-year schedule to implement the goals and objectives of the housing element. The new law instead requires this schedule of actions to occur

during the eight-year housing element planning period, and requires that each action have a timetable for implementation. SB 375 also requires that the schedules for the RTP and RHNA processes be synchronized and requires the RHNA to allocate housing units within the region in a manner consistent with the development pattern adopted by the SCS.

As previously discussed, on September 3, 2020, SCAG adopted its Connect SoCal: The 2020-2045 RTP/SCS, which is an update to the previous 2016-2040 RTP/SCS.[10] Using growth forecasts and economic trends, the 2020-2040 RTP/SCS provides a vision for transportation throughout the region for the next 25 years that achieves the statewide reduction targets; and in so doing identifies the amount and location of growth expected to occur within the region.

(3) Housing Crisis Act of 2019 – (SB 330, Skinner)

On October 9, 2019, Governor Newsom signed into law the Housing Crisis Act of 2019 (SB 330). SB 330 seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill is in effect as of January 1, 2020, but is temporary in nature as the bill's provisions expire on January 1, 2025.

(4) Fair Employment and Housing Act

The Fair Employment and Housing Act (FEHA) of 1959 (Government Code Section 12900 et seq.) prohibits housing discrimination on the basis of race, color, religion, sexual orientation, marital status, national origin, ancestry, familial status, disability, or source of income.

(5) The Unruh Civil Rights Act

The Unruh Civil Rights Act of 1959 (Civil Code Section 51) prohibits discrimination in "all business establishments of every kind whatsoever." The provision has been interpreted to include businesses and persons engaged in the sale or rental of housing accommodations.

c) Regional and Local

(1) Southern California Association of Governments

SCAG is tasked with providing demographic projections for use by local agencies and public service and utility agencies in determining future service demands. Projections in the SCAG RTP/SCS serve as the basis for demographic estimates in this analysis of Project consistency

[10] *Southern California Association of Governments, 2020-2045 RTP/SCS, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed March 2023.*

with growth projections. The findings regarding growth in the region are consistent with the methodologies prescribed by SCAG and reflect SCAG goals and procedures.

SCAG data is periodically updated to reflect changes in development activity and actions of local jurisdictions (e.g., zone changes). Through these updates, public agencies have advance information regarding changes in growth that must be addressed in planning for their provision of services. Changes in the growth rates are reflected in the new projections for service and utilities planning through the long-term time horizon.

(a) Regional Transportation Plan/Sustainable Communities Strategy

Pursuant to Government Code Section 65080(b)(2)(B), SCAG must prepare a RTP/SCS which (1) identifies the general location of uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (4) identify a transportation network to service the transportation needs of the region; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; and (6) consider the state housing goals specified in Sections 65580 and 65581, (7) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks to achieve the GHG reduction targets approved by the state board, and (8) allow the RTP to comply with air quality conformity requirements under the federal Clean Air Act.

On September 3, 2020, SCAG's Regional Council adopted the Connect SoCal 2020–2045 RTP/SCS. On October 30, 2020, CARB accepted SCAG's determination that the SCS would achieve GHG emission reduction targets. The 2020-2045 RTP/SCS meets federal and state requirements and is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS contains baseline socioeconomic projections that serve as the basis for SCAG's transportation planning. It includes projections of population, households, and employment forecasted for the years 2020, 2030, 2035, and 2045 at the regional, county, and local jurisdictional levels, and Traffic Analysis Zones (TAZ) that provide small area data for transportation modeling.[11] However, TAZ-level projections are utilized by SCAG for regional modeling purposes and are not adopted as part of Connect SoCal nor included as part of the Forecasted Regional Development Pattern.[12]

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[11] *Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics & Growth Forecast Appendix, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed March 2023.*

[12] *Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics & Growth Forecast Appendix, page 27, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed March 2023.*

(b) Regional Housing Needs Allocation

The RHNA is mandated by the State Housing Law as part of a periodic process of updating local housing elements in city and county general plans. The RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction within the SCAG region for eight-year periods. The RHNA provides an allocation of the existing and future housing needs by jurisdiction that represents the jurisdiction's fair share allocation of the projected regional population growth. The future housing needs allocations are broken down by income level so that each jurisdiction is responsible for the development of affordable housing units to meet future housing needs.

The 6th Cycle RHNA Allocation Plan is the RHNA that was in effect at the time that the NOP was issued for the Project and covers a planning period of October 2021 through October 2029, and it showed a need for 1,341,827 additional housing units within the SCAG region.[13] **Table IV.J-6, SCAG's 6th Cycle RHNA Allocation Plan**, shows the 6th Cycle RHNA Final Allocation Plan.

Table IV.J-6
SCAG's 6th Cycle RHNA Allocation Plan

Total	Very-Low Income	Low Income	Moderate Income	Above Moderate Income
SCAG Region				
1,341,827	351,796	206,807	223,957	559,267
Los Angeles County				
812,060	217,273	123,022	131,381	340,384
City of El Segundo				
492	189	88	84	131
5th Cycle Carryover[a]				
29	18	11	0	0

[a] *A shortfall from the 5th cycle was carried over into the 6th cycle.*
Source: SCAG, 6th Cycle Final RHNA Allocation, Methodology, and Regional Housing Needs Determinations, website: https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785. Accessed August 2023.

(2) City of El Segundo

(a) General Plan

The Housing Element is one of the seven required General Plan elements mandated by state law. State law requires that each jurisdiction's Housing Element consist of "identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled program actions for the preservation, improvement and development of housing." The Housing Element must analyze and plan for housing for all segments of the community. This Housing Element covers the Planning Period from October 2021 to October 2029, consistent with the state-mandated update required for all jurisdictions within the SCAG region. The Housing

[13] *Southern California Association of Governments, Regional Housing Needs Assessment, website: https://scag.ca.gov/rhna. Accessed March 2023.*

Element of the City's General Plan for the 2021-2029 cycle was adopted by the City Council in November 2022.[14]

The Housing Element states that less than 25 percent of the land within the City has been historically used for residential development. The remaining land has been used primarily for a mix of light and heavy industrial purposes and is not available for residential use. Approximately 405 acres were designated for residential in El Segundo, as identified in the Housing Element. Housing growth in the City has been limited due to the lack of vacant residentially designated land.[15]

Goals and policies that are applicable to the Project are listed below:[16]

Goal 3: Provide opportunities for new housing construction in a variety of locations and a variety of densities.

Policy 3.1: Provide for the construction of adequate housing in order to meet the goals of the Regional Housing Needs Assessment (RHNA).

Policy 3.3: Facilitate development on vacant and underdeveloped property designated as residential or mixed use to accommodate a diversity of types, prices and tenure.

Goal 4: Remove governmental constraints on housing development.

Policy 4.1: Continue to allow second units, condominium conversions, caretaker units and second floor residential use in commercial zones as specified in the El Segundo Municipal Code.

Policy 4.4: Facilitate provision of infrastructure to accommodate residential development.

(b) Specific Plan Update

The Specific Plan Update is an update to the adopted El Segundo Downtown Specific Plan, which serves as the land use and zoning plan for properties within the boundaries of the Specific Plan area. The Project would revise existing Specific Plan planning districts, amend General Plan and

[14] *City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023.*

[15] *City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023.*

[16] *City of El Segundo General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023.*

zoning designations on eight parcels, and include mobility enhancements. In addition, the Project would include public improvements and streetscape guidelines, private urban form criteria, permitted land uses, development standards, mobility and infrastructure improvements, an implementation plan, and administration processes. The Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units within the Specific Plan area.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate a project's impacts to population and housing are based on Appendix G to the *State CEQA Guidelines*. According to Appendix G to the *State CEQA Guidelines*, a significant impact related to population and housing would occur if a project would:

Threshold (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)?***

Threshold (b): ***Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

b) Analysis of Project Impacts

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

Project impacts associated with population, housing, and employment are based on estimates of the number of residents, households, and employees that may be generated by the Project in comparison to regional growth forecasts. The Project's estimates are then compared to population, housing, and employment projections from SCAG growth forecasts for the City, as used in the development of the 2020–2045 RTP/SCS (Connect SoCal).

(1) Construction Impacts

Construction activities in the Specific Plan area would lead to the temporary need for construction workers, which may come from the City, other areas of Los Angeles County, or elsewhere within the SCAG region. The proposed Project involves fairly common construction requirements that would not require a highly specialized labor force to permanently relocate from other regions. The different construction activities require specific skill sets for a much shorter duration than the overall construction schedule. Because construction workers would not be needed continuously throughout the period of time anticipated to reach the buildout of the Specific Plan Update, it is reasonable to assume that workers/crews would work in the Specific Plan area on a temporary

basis only and, thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Because the demand for construction workers would be short-term, and because the Specific Plan area is within an urban metropolitan region with a high diversity of skilled labor, a permanent need for new workers to relocate in order to accommodate the proposed Project's temporary construction workforce is not anticipated. Any changes in the City or regional population, housing, or employment due to short-term construction activities would be less than significant and no mitigation would be required.

(2) Operational Impacts

The Project would revise existing Specific Plan planning districts, amend General Plan and zoning designations on eight parcels, and include mobility enhancements. In addition, the Project would include public improvements and streetscape guidelines, private urban form criteria, permitted land uses, development standards, mobility and infrastructure improvements, an implementation plan, and administration processes. The Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units within the Specific Plan area. As such, the proposed Project would directly result in the addition of housing and commercial land uses in the Specific Plan area, which would increase population, housing, and employment.

(a) Population

SCAG estimated that Los Angeles County would have 10,407,000 residents by 2020 and 11,674,000 residents by 2045 (see **Table IV.J-1, SCAG Regional Population, Households, and Employment Forecasts**). SCAG estimated that the City had 16,700 residents in 2016 and the U.S. Census estimated that the City had 17,272 residents in 2020. SCAG estimates that the City would have 17,200 residents in 2045 (see **Table IV.J-2, City and County Resident Growth and Forecasts 2016-2045**). SCAG's forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. The U.S. Census counted 17,272 residents in the City in 2020, which is an increase of 572 residents between 2016 and 2020 compared to SCAG's estimate. Therefore, SCAG's estimate of the number of residents in 2045 is probably low. As a result, this analysis uses the data from the U.S. Census to estimate the number of residents per household.

The U.S. Census estimated that there were 7,070 households in the City in 2020. By dividing the number of residents (17,272) by the number of households, the number of residents per household is 2.44. The Project would add 300 residential units to the Specific Plan area. Therefore, there would be 732 new residents in the City with the full buildout of the Specific Plan Update. Although the number of residents exceeds SCAG's projections, as explained above, SCAG's projections are low when compared to actual Census counts. Furthermore, implementation of the Specific Plan Update would ensure that this population growth would be accommodated in the City with new infrastructure, transportation and mobility, public facilities, and comprehensive long-term planning.

Therefore, the Project would not induce substantial unplanned population growth in the area through the planned increase in population; this impact would be less than significant and no mitigation would be required.

(b) Housing

SCAG projects that the City will have an increase of 300 households between 2016 and 2045. The proposed Project's 300 residential units would accommodate 4.3 percent of SCAG's projected households for the City (see **Table IV.J-3, City and County Household Growth and Forecasts 2016-2045**). Therefore, the proposed Project's 300 housing units would not exceed SCAG's projections for the City.

California's housing element law requires that each city and county develop local housing programs designed to meet its fair share of existing and future housing needs for all income groups. This effort is coordinated when preparing the state-mandated Housing Element of the City's General Plan. This fair share allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of, not only its resident population, but for all households that might reasonably be expected to reside within the jurisdiction, particularly lower income households. This assumes the availability of a variety and choice of housing accommodations appropriate to their needs, as well as mobility among households within the region.

Table IV.J-6, SCAG's 6th Cycle RHNA Allocation Plan, provides the 6th Cycle RHNA allocation for 2021 to 2029 as set forth in the City's Housing Element. The City's fair share allocation for the planning period is 521 housing units.[17] This indicates that between the years 2021 to 2029, the City needs to accommodate at least 521 housing units, consisting of a variety of housing types to accommodate extremely low, very low, low, moderate, and above moderate-income households to keep pace with housing demand. The specific allocation between the types of low-income housing has yet to be determined; however, the proposed housing units would satisfy a portion of the City's mandated 6th Cycle RHNA allocation. As such, the proposed Project's 300 new residential units would assist the City in meeting the mandated RHNA allocation and would be consistent with and supportive of the City's Housing Element projections for new residential units within the City.

Therefore, the Project would not induce substantial unplanned population growth in the area through the planned increase in housing; this impact would be less than significant and no mitigation would be required.

(c) Employment

The Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units within the Specific Plan area. As shown in **Table IV.J-7,**

[17] *This includes the 5th Cycle Housing Element shortfall of 18 extremely/very low and 11 low income units (total shortfall is 29 units).*

Employment Estimate, the proposed Project is estimated to generate approximately 1,057 new employees within the Specific Plan Update area.

Table IV.J-7
Employment Estimate

Land Use	Size (sf)	Employee Generation Factor [a] (sf/employee)	Number of Employees
Retail/Restaurant	130,000	447	291
General Office	200,000	286	699
Medical Office	24,000	360	67
Total			**1,057**

[a] *El Segundo Unified School District, Residential and Commercial/Industrial Development School Fee Justification Study, Table ES-4, page ES-5, May 11, 2020.*

With the buildout of the Specific Plan Update, the number of jobs in the City would increase by approximately 1,057, which could be filled by persons within or outside of the City. The proposed Project's anticipated employment would represent a nominal increase (0.16 percent) of SCAG's projected 639,000 new jobs in Los Angeles County between 2016 and 2045. SCAG estimates that the City would have 52,400 jobs by 2045 (see **Table IV.J-4, City and County Employment Growth and Forecasts 2016-2045**). The proposed Project's anticipated employment would represent an increase of 25.78 percent of SCAG's projected 4,100 new jobs in the City between 2016 and 2045. The estimated 1,057 new employees within the Specific Plan Update area would be within SCAG's employment projections and, thus, are part of the planned growth for the area. Therefore, the Project would not induce substantial unplanned population growth in the area through the planned increase in businesses; this impact would be less than significant and no mitigation would be required.

(d) Jobs/Housing Balance

As previously discussed, the City is considered to be a very jobs-rich community. The proposed Project would generate additional housing and jobs for the community. The jobs-housing balance of the proposed Project would be 3.5:1. Similar to the City's jobs/housing balance (6.9:1 in 2016), the proposed Project would result in a jobs-rich jobs-to-housing ratio; albeit smaller than the current ratio. Therefore, the proposed Project would not likely substantially increase or decrease the current jobs-housing balance in the City.

Threshold (b): Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Specific Plan Update is an integrated long-term plan of strategies, regulations, development standards, and guidelines. Development pursuant to the Specific Plan Update would be initiated voluntarily by property owners. The Specific Plan does not contain any provisions authorizing eminent domain of residential properties by either the City or any other jurisdiction. Infrastructure, roadway, open space, and other public improvements proposed under the Specific Plan Update would not require the displacement of housing. The Specific Plan Update would neither require

nor encourage the displacement of existing housing. Therefore, impacts on population and housing displacement would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

Of the 13 related projects listed in **Table II-1, List of Related Projects** in **Section II, Environmental Setting**, only five related projects include housing units.

- Related Project No. 1, Housing Element – 1,846 units
- Related Project No. 2, Pacific Coast Commons Specific Plan – 263 units
- Related Project No. 4, Stick n Stein Mixed Use – 50 units
- Related Project No. 5, 201-209 Richmond Street – 4 units
- Related Project No. 9, Smoky Hollow Specific Plan – 6 units

The Smoky Hollow Specific Plan boundary extends from the southeastern boundary of the Specific Plan area eastern to Pacific Coast Highway. The updated Smoky Hollow Specific Plan sets forth a regulatory and planning framework, including development standards, that focus on revitalizing buildings for incubator industrial and office space.

The Pacific Coast Commons Specific Plan extends from Palm Avenue to the north, Pacific Coast Highway to the east, Holly Avenue to the south, and Indiana Street to the west. The Pacific Coast Commons Specific Plan would allow for: (1) the continued operation of the Fairfield Inn and Suites Hotel and the Aloft Hotel, which contain 596 rooms within 288,767 square feet of development; (2) 327,021 square feet of residential development for 263 new housing units, including 257 multi-family apartments and six condominiums/townhomes; (3) 11,252 square feet of commercial/retail uses; and (4) three new parking structures with 792 parking stalls.

a) Unplanned Population Growth

As discussed above, assuming 2.44 persons per household, the proposed Project's 300 residential units would accommodate 732 individuals. **Table IV.J-8, Cumulative Population and Housing**, shows the number of housing units and population for the five related projects with housing units in combination with the proposed Project. Cumulatively, the proposed Project, in combination with the five related projects, would result in 2,469 residential units with approximately 6,025 people.

Table IV.J-8
Cumulative Population and Housing

No.	Project	Housing Units	Population
1	Housing Element	1,846	4,504
2	Pacific Coast Commons Specific Plan	263	642
4	Stick n Stein Mixed Use	50	122
5	201-209 Richmond Street	4	10
9	Smoky Hollow Specific Plan	6	15
Subtotal		*2,169*	*5,293*
Proposed Project	Downtown Specific Plan Update	*300*	*732*
Total		**2,469**	**6,025**
Source: EcoTierra Consulting, 2023. See also Table II-1.			

In addition, the proposed Project as well as the related projects would generate new jobs within the City. As shown in **Table II-2**, **List of Related Projects**, it is estimated that the related projects would generate approximately 15,131 additional jobs. As shown in **Table IV.J-7**, **Employment Estimate,** the proposed Project would generate approximately 1,057 new employees within the Specific Plan Update area. Together, the proposed Project and the related projects would generate approximately 16,188 new employees, which would be filled by people residing within and outside of the City. However, the combination of the jobs generated by the proposed Project and the related projects would occur over approximately two decades, which allows for the additional jobs to be gradually accommodated in the City and surrounding areas.

Nonetheless, the cumulative increase in employment in the City could exacerbate the jobs-rich profile of the City, which could increase the vehicle miles traveled between employment centers and residential land uses. While the proposed Project would provide employment opportunities to the local and regional area, the employment growth caused by the proposed Project falls well within current projections for employment growth in the City and Los Angeles County. The proposed housing growth generated by the proposed Project would further the goals and strategies of SCAG and the City's General Plan by providing housing in an urban setting in close proximity to transit, while contributing to a more balanced jobs-housing community. Therefore, the population and housing growth is not considered to be substantial and impacts would be less than significant. As such, the proposed Project, in combination with other future foreseeable projects, would create a cumulatively considerable impact to population, housing, or employment.

b) Population or Housing Displacement

Neither the Specific Plan Update nor the related projects contain any provisions authorizing eminent domain of residential properties by either the City or any other jurisdiction. Infrastructure, roadway, open space, and other public improvements proposed under the Specific Plan Update or the related projects would not require the displacement of housing. Neither the Specific Plan Update nor the related projects would require the displacement of existing housing. Furthermore, recent State laws, including SB 567 (Homeless Prevent Act) and AB 1482 (California Tenant Protection Act of 2019) protect renters from being displaced without extended notice and "just cause", among other protections. In addition, SB 166 (No Net Loss) ensures that development opportunities remain available throughout the planning period to accommodate a jurisdiction's

regional housing needs allocation. Therefore, the proposed Project, in combination with other future foreseeable projects, would create a cumulatively considerable impact to population or housing displacement.

6. Mitigation Measures

Project-level and cumulative impacts with regard to population and housing would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to population and housing would be less than significant.

8. References

City of El Segundo, El Segundo Downtown Specific Plan, May 2023, Public Review Draft, page 6-3.

City of El Segundo General Plan. Adopted December 1, 1992, website: https://www.elsegundo.org/government/departments/community-development/planning-division/general-plan. Accessed March 2023.

City of El Segundo, General Plan Housing Element Update. November 2022, website: https://www.elsegundo.org/home/showpublisheddocument/6383/638086038877070000. Accessed March 2023.

City of El Segundo, Pacific Coast Commons Specific Plan Draft Environmental Impact Report, February 2021, page 4.11-13.

City of El Segundo, Smoky Hollow Specific Plan Update Draft Environmental Impact Report, March 8, 2018, page 20-4.

El Segundo Unified School District, Residential and Commercial/Industrial Development School Fee Justification Study, Table ES-4, page ES-5, May 11, 2020.

Southern California Association of Governments, Regional Housing Needs Assessment, website: https://scag.ca.gov/rhna. Accessed March 2023.

Southern California Association of Governments, 2020-2045 RTP/SCS, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed March 2023.

Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, Table 13, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed March 2023.

Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, Tables 13 and 14, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed August 2023.

Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics & Growth Forecast Appendix, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed March 2023.

Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics & Growth Forecast Appendix, page 27, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed March 2023.

Southern California Association of Governments, 6th Cycle Final RHNA Allocation, Methodology, and Regional Housing Needs Determinations, website: https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785. Accessed August 2023.

U.S. Census Bureau, QuickFacts: El Segundo City and Los Angeles County, website: https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia,elsegundocitycalifornia,US/POP010220. Accessed August 2023.

IV. Environmental Impact Analysis

K. Public Services

1. Fire Protection

1. Introduction

This section describes the existing fire protection services of the El Segundo Downtown Specific Plan Update (Project) area, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on a review of relevant online data from the City of El Segundo's (City) website and email correspondences with the El Segundo Fire Department (ESFD). For the relevant information, refer to **Appendix H**, of this this Draft Environmental Impact Report (Draft EIR). Other sources consulted are listed in **Section IV.K.1.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included **in Section I, Introduction**, of this Draft EIR. A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Fire Prevention and Environmental Safety Services

Fire prevention and environmental safety services at the Project Site are provided by the ESFD. The ESFD in conjunction with the El Segundo Community Development Department perform review services and inspections of new buildings. Additionally, the ESFD enforces building standards related to fire and life safety adopted by the California Building Standards Commission and other regulations formally adopted by the City for fire prevention. The ESFD Environmental Safety Division is the locally designated Unified Program Agency, authorized to apply statewide standards for each facility within its jurisdiction. The Fire Prevention Bureau is comprised of four personnel that include a Fire Marshal and three Fire Prevention Inspectors. Environmental Safety is comprised of three personnel that include one Environmental Safety Manager, one Principal Environmental Specialist and one Management Analyst.[1]

[1] *City of El Segundo Fire Department, website: https://www.elsegundofd.org/home-fire. Accessed July 2023.*

b) Fire Suppression Services

The ESFD Suppression Division is responsible for the fire, emergency medical and life safety services to the community. Key services provided include extinguishing fires, emergency medical treatment and transportation, responding to disasters (natural and man-made), executing specialized technical rescue response, controlling hazardous materials incidents, and providing general public assistance.[2] **Table IV.K.1-1, ESFD Major Incidents,** provides a summary of the service calls that the ESFD responded to in 2022. Fire Station 1 responded to 1,655 calls for service in 2022, and Fire Station 2 responded to 1,422 calls for service in 2022.[3]

Table IV.K.1-1
ESFD Major Incidents

Major Incident Type	# Incidents	% of Total
Fires	79	2.57
Overpressure rupture, explosion, overheat – no fire	6	0.2
Rescue and Emergency Medical Service	1,960	63.7
Hazardous Condition – no fire	140	4.55
Service Call	150	4.87
Good Intent Call	363	11.8
False Alarm and False Call	350	11.37
Special Incident Type	29	0.94
Total	**3,077**	**100**

*Source: Email correspondence with Casey Snow, Battalion Chief, Segundo Fire Department, dated August 9, 2023. Refer to **Appendix H** of this Draft EIR.*

The ESFD is part of the California Master Mutual Aid program in which fire personnel mobilize from unaffected areas to support other areas that are experiencing an emergency such as a large brush fire, earthquake, mudslide, or any number of natural or man-made disasters.[4]

The ESFD is made up of 42 fire suppression personnel including three battalion chiefs, nine captains, nine engineers, fifteen firefighter/paramedics, and six firefighters. There are 14 fire suppression personnel on duty each day that are divided into three different platoons.[5] These personnel staff two Fire Engine Companies, one tractor-drawn Ladder Truck, two paramedic Rescue Ambulances, and one Battalion Chief Command vehicle.[6] The Urban Search and Rescue

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2 *City of El Segundo Fire Department, Suppression, website: https://www.elsegundofd.org/suppression. Accessed July 2023.*
3 *Email correspondence with Casey Snow, Battalion Chief, Segundo Fire Department, dated August 9, 2023. Refer to **Appendix H** of this Draft EIR.*
4 *City of El Segundo Fire Department, Suppression, Operations, website: https://www.elsegundofd.org/suppression/operations. Accessed July 2023.*
5 *Email correspondence with Casey Snow, Battalion Chief, Segundo Fire Department, dated August 9, 2023. Refer to **Appendix H** of this Draft EIR.*
6 *Email correspondence with Casey Snow, Battalion Chief, Segundo Fire Department, dated August 9, 2023. Refer to **Appendix H** of this Draft EIR.*

unit is crossed staffed by the Ladder Truck personnel and is always available to respond to any technical emergency.[7]

Fire Station 1 is located at 314 Main Street and serves the residential community, Chevron Refinery, El Segundo Beach and light industrial businesses located in the "Smoky Hollow" area. Fire Station 2 is located at 2261 East Mariposa Avenue, and serves the commercial and industrial businesses east of Pacific Coast Highway. As indicated in **Table IV.K.1-2, Fire Stations Serving the Project Site**, Fire Station 1 has six staff members, a Battalion Chief vehicle, a Fire engine, and an Ambulance. Fire Station 2 has eight staff members, a Fire engine, a Ladder Truck, an Ambulance, and Urban Search and Rescue Vehicle.[8]

Table IV.K.1-2
Fire Stations Serving the Project Site

Fire Station and Address	Distance to Project Site (miles)	Staff	Equipment & Services
Fire Station 1 314 Main Street	DSP	6	Battalion Chief vehicle, Fire engine, Ambulance
Fire Station 2 2261 East Mariposa Avenue	1.8	8	Fire engine, Ladder Truck, Ambulance, Urban Search and Rescue Vehicle
*Source: Email correspondence with Casey Snow, Battalion Chief, Segundo Fire Department, dated August 9, 2023. Refer to **Appendix H** of this Draft EIR.*			

c) Emergency Medical Services

The El Segundo Paramedics provide complete Emergency Medical Services (EMS) to the residents and business community within the City. The El Segundo Paramedics operate with two paramedic rescue ambulances, each are staffed by two firefighter/paramedics, two advanced life support fire engines, an advanced life support truck, and all Paramedic Assessment Units.[9]

d) Fire Hazard Areas

According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zone maps and the City's General Plan Public Safety Element, the City does not contain Fire

[7] *City of El Segundo Fire Department, Suppression, Operations, website: https://www.elsegundofd.org/suppression/operations. Accessed July 2023.*
[8] *Email correspondence with Casey Snow, Battalion Chief, Segundo Fire Department, dated August 9, 2023. Refer to **Appendix H** of this Draft EIR.*
[9] *City of El Segundo Fire Department, Suppression, Emergency Medical Services, website: https://www.elsegundofd.org/suppression/emergency-medical-services. Accessed July 2023.*

Hazard Severity Zones.[10,11] Due to the urban setting of the City, the potential for wildland fire hazards is extremely limited.

e) Response Distances and Times

Consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, the below discussion of response times is provided for informational purposes only.

Per the City of El Segundo's General Plan Draft EIR, the ESFD stations have an average City-wide response time of two minutes for the City's residential areas and slightly less than four minutes for the City's commercial/industrial areas. A response time within five to eight minutes is considered the maximum to limit structural loss.[12] **Table IV.K.1-3, ESFD Travel Time By Fire Unit,** and **Table IV.K.1-4, ESFD First Unit Travel Time,** provides a summary of the travel times for the ESFD from 2017 to 2022. As shown within **Table IV.K.1-3, ESFD Travel Time By Fire Unit,** and **Table IV.K.1-4, ESFD First Unit Travel Time**, based on the criteria of average response times, fire protection in the City is currently adequate.

Table IV.K.1-3
ESFD Travel Time By Fire Unit

Unit Response	2017	2018	2019	2020	2021	2022	Total
E31	0:02:55	0:02:08	0:02:06	0:02:40	0:02:26	0:01:54	0:02:21
E32	0:04:20	0:04:40	0:05:19	0:05:17	0:05:34	0:05:15	0:04:54
E33	0:01:57	0:01:45	0:04:52	0:03:44	0:02:26	0:01:17	0:02:02
R31	0:03:12	0:01:55	0:02:13	0:02:37	0:02:40	0:02:42	0:02:39
R32	0:05:15	0:04:25	0:04:58	0:05:46	0:06:55	0:05:29	0:05:21
R33	0:05:30	0:01:22	0:01:17	0:07:34	0:04:05	0:03:23	0:01:50
T32	0:04:50	0:08:03	0:14:23	0:05:10	0:02:50	0:01:36	0:06:09
Average Total	0:03:21	0:02:18	0:02:23	0:03:08	0:02:52	0:02:29	0:02:44

*Source: Email correspondence with Paul Rottenberg, Fire Stats, LLC, dated August 29, 2023. Refer to **Appendix H** of this Draft EIR.*

Table IV.K.1-4
ESFD First Unit Travel Time

Study Area	2017	2018	2019	2020	2021	2022	Total
In	0:02:59	0:01:38	0:01:54	0:02:35	0:02:00	0:01:38	0:02:07
Out	0:03:36	0:03:28	0:03:27	0:03:45	0:03:27	0:03:30	0:03:32
Average Total	0:03:33	0:03:21	0:03:21	0:03:41	0:03:23	0:03:24	0:03:27

*Source: Email correspondence with Paul Rottenberg, Fire Stats, LLC, dated August 29, 2023. Refer to **Appendix H** of this Draft EIR.*

[10] *California Department of Forestry and Fire Services, "Fire Hazard Severity Zone Viewer", website: http://egis.fire.ca.gov/FHSZ/. Accessed July 2023.*

[11] *City of El Segundo. El Segundo General Plan, Chapter 10, Public Safety Element. Adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed July 2023.*

[12] *City of El Segundo, City of El Segundo General Plan Draft EIR, adopted December 1991.*

f) Fire Water Infrastructure

As discussed in **Section IV.N.1, Utilities and Service Systems—Water**, of this Draft EIR, the El Segundo Public Works Department, Water Division provides water for domestic and firefighting services in accordance with the El Segundo Fire Code.

The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. The required fire flow requirements from the City of El Segundo can range from 1,500 gallons per minute (gpm) up to 8,000 gpm, depending on the type of construction build and would comply with the 2022 California Fire Code. A minimum residual water pressure of 20 pounds per square inch (psi) flowing from a minimum of two hydrants flowing simultaneously is also required.[13]

g) Fire Hazard Area

The Project Site is not located within a County of Los Angeles Fire Hazard Severity Zone[14], or a State-designated Wildfire Hazard Potential Zone.[15] The nearest designated State-designated Wildfire Hazard Potential Zone is located well outside the City limits. In addition, the Project Site is surrounded by urban development and vacant lots, and is not located adjacent to any wildlands. Therefore, the Project Site is not located within a high fire hazard area or an area subject to wildland fire.

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) National Fire Protection Association

The National Fire Protection Association Standard 1710 calls for response time targets of 4 minutes or less for the arrival of the first arriving engine company at a fire suppression incident and 8 minutes or less for the deployment of a full crew. It also establishes EMS response times of 4 minutes or less for a first responder and 8 minutes or less for a full company.

(2) Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA as well as California OSHA (Cal/OSHA) enforce the provisions of the federal and state Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part

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[13] *California Code of Regulations, Title 24, Part 9, California Building Standards Commission, 2022 California Fire Code.*

[14] *Los Angeles County GIS Data Portal, Fire Hazard Severity Zone Map, website: https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=d2ea45d15c784adfa601e84b38060c4e, access July 2023.*

[15] *ArcGIS Wildfire Hazard Potential Zone Map, website: https://www.arcgis.com/home/item.html?id=55226e8547f84aae8965210a9801c357%20, access July 2023.*

1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the Federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

(3) Federal Emergency Management Act (FEMA)

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

(4) Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 5121-5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Disaster Mitigation Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of the Disaster Mitigation Act include:

- Funding pre-disaster mitigation activities;
- Developing experimental multi-hazard maps to better understand risk;
- Establishing state and local government infrastructure mitigation planning requirements;
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- Adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of the Disaster Mitigation Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

b) State

(1) California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including general fire safety standards for new buildings, which are presented with more detail in the California Fire Code (CCR Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by State agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2022 edition of the California Building Code became effective on January 1, 2023.[16] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by State agencies and local governing bodies. Typical fire safety requirements of the California Fire Code include the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the El Segundo Municipal Code (ESMC), as discussed below.

(2) California Fire Service and Rescue Emergency Aid System

The ESFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[17] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The ESFD is located in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES.[18]

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16 *California Building Code, (California Code of Regulations, Title 24, Part 2).*

17 *California Emergency Management Agency, Mutual Aid Plan, website: https://www.caloes.ca.gov/wp-content/uploads/Fire-Rescue/Documents/CalOES_-_Fire_and_Rescue_-_Mutual_Aid_Plan-3.pdf. Accessed March 2023.*

18 *California Emergency Management Agency, Mutual Aid Plan, website: https://www.caloes.ca.gov/wp-content/uploads/Fire-Rescue/Documents/CalOES_-_Fire_and_Rescue_-_Mutual_Aid_Plan-3.pdf. Accessed March 2023.*

(3) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls. This section of the (CVC) states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a) (1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety. (b) The operator of every street car shall immediately stop the street car, clear of any intersection, and remain stopped until the authorized emergency vehicle has passed. (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.*

(4) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, the City is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found under Section 35 that cities have "a constitutional obligation to provide adequate fire protection services".

c) Regional and Local

(1) City of El Segundo General Plan

The following goal outlined in the City of El Segundo General Plan Land Use Element is relevant to the Project:[19]

[19] *City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed July 2023.*

Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.

Objective LU7·1: Provide the highest and most efficient level of public services and public infrastructure financially possible.

Objective C1-2: Provide a circulation system consistent with current and future engineering standards to ensure the safety of the residents, workers and visitors of El Segundo.

Policy C1-1.8: Provide all residential, commercial and industrial areas with efficient and safe access for emergency vehicles.

(2) El Segundo Municipal Code – Title 13, Chapter 9 Fire Code

The ESFD adopts the California Fire Code with local amendments, as a result of existing local climatic, geological, and topographical conditions, that are necessary to provide sufficient and effective levels of fire safety for the protection of life, health, and property. Chapter 13-9, Fire Code, of the ESMC authorizes the ESFD to regulate building and other construction as it relates to fire prevention. Regulations applicable to the Project include the following:

1. Access Roadway for Fire Apparatus Fire Lanes,
2. Fire Department Connections and Fire Sprinkler System Control Valves,
3. Fire Hydrant and Private Fire Main System Installation,
4. Water-Based Fire Extinguishing Systems Servicing,
5. Fire Sprinkler System,
6. Five Year Test of Fire Sprinkler Systems,
7. Key Box Installations,
8. Maintenance and Test of Fire Protection Systems; and
9. Standards for Fire Alarm Systems.

(3) El Segundo Municipal Code – Title 15, Chapter 32 Development Impact Fees

This chapter of the municipal code was adopted pursuant to the City's police powers and the mitigation fee act for the purpose of imposing fees on applicants seeking to construct development projects. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the City's public services and public facilities. Toward that end, the City intends that applicants for such development projects pay their fair share of the costs of providing such public services and public facilities. Accordingly, the amount of each impact fee is calculated based upon the gross square footage of nonresidential development, number of residential dwelling units, type or density or intensity of use, vehicle trip generation, or other appropriate methodology, which ensures that the fee is roughly proportional to the impacts of new development on public facilities. The City assumes responsibility for and will pay for with general

city revenues all public facility needs for existing development (Ord. 1389, 12-6-2005). This chapter applies to all fees imposed by the City to finance public facilities attributable to new development, including the following (Ord. 1389, 12-6-2005):

A. Law enforcement facilities, vehicles, and equipment,
B. Fire suppression facilities, vehicles, and equipment,
C. General facilities, vehicles, and equipment,
D. Community library facilities and collections,
E. Public use (community centers) facilities,
F. Parks/open space and recreation facilities; and
G. Road project construction, right of way acquisition, and engineering.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate Project impacts to fire services are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to fire services would occur if the Project would:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.***

b) Project Design Features

The Project would implement the following Project Design Features (PDFs) to minimize the potential for fire services-related impacts during construction. The PDFs would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

PDF PS-1: Provide an automatic fire sprinkler system throughout every proposed mid-rise building,[20] installed in accordance with El Segundo Municipal Code Chapter 9 and the currently adopted edition of the NFPA 13.

PDF PS-2: Provide a manual fire alarm system throughout each building, installed in accordance with El Segundo Municipal Code Chapter 9 and the currently adopted edition of NFPA 72.

[20] *Per the ESMC Chapter 9, A mid-rise building is defined as a building four or more stories high, but not exceeding 75 feet in height and not defined as a high-rise building by section 202 of the California Building Code. Height measurements shall be made from the underside of the roof or floor above the topmost space that may be occupied to the lowest fire apparatus access road level.*

c) Analysis of Project Impacts

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

(1) Construction

Construction activities within the Specific Plan area have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. The implementation of "good housekeeping" procedures by the construction contractors and the work crews would minimize these hazards. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. The Project would be required to implement standard best management practices (BMPs) set forth by the City and the Regional Water Quality Control Board (RWQCB), which would ensure that hazardous materials and wastes generated during the construction process are handled, and stored, and disposed of properly. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant with implementation of **Mitigation Measure (MM) PS-1** for the following reasons:

- Emergency access would be maintained within the Specific Plan area during construction through marked emergency access points approved by the ESFD (see **MM PS-1**);
- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets within the Specific Plan area, flagmen would be used to facilitate the traffic flow until construction is complete (see **MM PS-1**); and
- The future construction within the Specific Plan area would be required to prepare a Construction Management Plan (see **MM PS-1**) that would address traffic and access control during construction.

(a) Emergency Access

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site. During construction, temporary traffic controls would be provided to

direct traffic around any closures as required in the Construction Management Plan (**MM PS-1**). Travel lanes would be maintained in each direction throughout the construction period, and emergency access would not be impeded. If partial lane closures become necessary, the Construction Management Plan includes measures, such as a flagman, to facilitate traffic flow. The Construction Management Plan would include measures to ensure safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools. Emergency access to the Project Site would be maintained at all times.

Moreover, construction impacts are temporary in nature and do not cause lasting effects to impact ESFD fire protection services. Accordingly, construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the ESFD. Therefore, construction-related impacts on fire protection services would be less than significant with implementation of **MM PS-1**.

(2) Operation

The analysis of the Project's operational impacts on fire protection and emergency medical services addresses potential impacts associated with ESFD resources and equipment, fire water infrastructure system to provide the necessary fire flows, response distances and times, and emergency access.

(a) Facilities and Equipment

The Project Site is expected to continue to be served by "first-in" Fire Station No. 1, and Fire Station No. 2, as back up when needed. As discussed in **Section III. Project Description**, of this Draft EIR, the Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. As discussed in **Section IV.J, Population and Housing**, of this Draft EIR, the Project would be expected to generate 1,057 full- and part-time jobs and 732 residents. The increase in new employees, visitors, and residents to the Project Site would create demand for additional fire protection services in the Specific Plan area.

Compliance with applicable regulatory requirements, including ESFD's fire/life safety plan review and fire/life safety inspection, would ensure that adequate fire prevention features would be provided in order to reduce the demand on ESFD facilities and equipment. In addition, in accordance with the fire protection-related programs set forth in the General Plan Public Safety Element, and PDF's, as well as ESFD's continued evaluation of existing fire facilities, Project impacts with regard to ESFD facilities and equipment would be less than significant and no mitigation would be required.

(b) Fire Flows

Fire flow for future development would comply with the 2022 California Fire Code. The final fire flow required for future development would be established by the ESFD during its review of project

plot plan, prior to the issuance of a building permit by the City.[21] The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for future development. Therefore, impacts related to fire flow would be less than significant and no mitigation would be required.

(c) Response Distances and Times

As noted above, potential impacts on emergency response times are not an environmental impact that CEQA requires a project applicant to mitigate. The below discussion of response times is for informational purposes only.

As discussed in **Section IV.L, Transportation**, of this Draft EIR, the proposed Project is estimated to result in a less than significant transportation impact based on methodology and thresholds established in the El Segundo SB 743 Implementation Guidelines. As such, emergency response times would not be affected. Regardless, upon completion of a development within the Specific Plan area, the ESFD would be provided with a diagram of the property, and this diagram would include access routes and any additional information that may facilitate ESFD response to a new development. Therefore, with the provision of additional information that may facilitate ESFD response to the Project Site, Project impacts related to response times would be less than significant and no mitigation would be required.

As previously discussed, per El Segundo's General Plan Draft EIR, the ESFD's average City-wide response times are two minutes for the City's residential areas and slightly less than four minutes for the City's commercial/industrial areas. A response time within five to eight minutes is considered the maximum to limit structural loss.[22] However, given that Fire Station 1 is located within the Specific Plan area, it is anticipated that the ESFD response times from this station to development within the Project Site would remain below the ESFD's five to eight minute maximum response time, even with the addition of Project traffic. Regardless, the Project would be in compliance with the **PDF PS-1** and **PDF PS-2**, which are comprised of:

- providing an automatic fire sprinkler system throughout each building, installed in accordance with El Segundo Municipal Code Chapter 9 and the currently adopted edition of NFPA 13; and

- provide a manual fire alarm system throughout each building, installed in accordance with El Segundo Municipal Code Chapter 9 and the currently adopted edition of NFPA 72.

Conformance with applicable Fire Code and PDF's would provide adequate on-site fire protection. Therefore, impacts related to response times would be less than significant and no mitigation would be required.

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[21] *Email correspondence with Casey Snow, Battalion Chief, Segundo Fire Department, dated August 15, 2023. Refer to **Appendix H** of this Draft EIR.*

[22] *City of El Segundo, City of El Segundo General Plan Draft EIR, adopted December 1991.*

(d) Emergency Access

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site. All circulation improvements, described in **Section IV.L, Transportation,** of this Draft EIR, that are proposed for the Project Site would comply with the Fire Code. Emergency access to the Project Site would be maintained at all times.

While the Project is anticipated to increase the number of vehicles on roadways in the Project vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, it is anticipated that the ESFD would be able to respond to emergency calls within the established response time. Therefore, impacts related to emergency access would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

The geographic scope of the cumulative fire protection analysis encompasses the service area for the ESFD, in particular. The Project, in combination with the construction and operation of the related projects would result in additional residential, office, industrial, and commercial land uses within this service area. As detailed in **Section II, Environmental Setting**, of this Draft EIR, development of the identified related projects would allow an increase of approximately 5,293 residents and 15,131 additional jobs. Accordingly, cumulative development, including the Project, would allow for up to 6,025 new residents and 16,188 additional jobs within the City. It is anticipated that the additional population and commercial activity would increase the demand for fire protection in the service area for ESFD. Specifically, there would be increased demand for additional ESFD staffing, equipment, and facilities over time. However, similar to the Project, future development within the City, regardless of location or size would be subject to ESFD review of site plans, hydrant locations, and fire flow requirements, to ensure compliance with fire and life safety standards.

In addition to the capabilities of ESFD serving the Project Site and surrounding areas, including the related projects, growth in population and development throughout the City could increase demand for ESFD staffing, equipment, and facilities. These demands are met by ESFD within the constraints of available resources, as well as through the allocation of resources between ESFD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of the existing management and regulatory requirements, the cumulative demand for fire protection is identified and addressed to the satisfaction of the City's elected leadership. Therefore, the Project, in combination with demand for fire protection services Citywide, would not result in a significant cumulative effect. Further, the Project impact analysis determined the impact on fire protection would be less than significant with implementation of **MM PS-1**; thus, Project impacts would not be cumulatively considerable. Based on the above analysis, cumulative impacts related to fire protection would be less than significant and no mitigation would be required.

6. Mitigation Measures

MM PS-1: The Project shall implement a Construction Management Plan (CMP) that would include street closure information, a detour plan, haul routes and a staging plan. The CMP would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CMP shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and shall include, but not limited to: prohibition of construction worker parking on nearby residential streets; worker parking would be provided on-site or in designated off-site public parking areas; temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men); scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets; construction-related vehicles shall not park on surrounding public streets; and safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to fire protection and emergency services would be significant. However, with the incorporation of **MM PS-1** construction-related impacts to fire protection would be reduced to a level of less than significant. Project-level and cumulative operational impacts with regard to fire protection would be less than significant.

8. References

ArcGIS Wildfire Hazard Potential Zone Map, website: https://www.arcgis.com/home/item.html?id=55226e8547f84aae8965210a9801c357%20. Access July 2023.

California Building Code, (California Code of Regulations, Title 24, Part 2).

California Code of Regulations, Title 24, Part 9, California Building Standards Commission, 2022 California Fire Code.

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City of El Segundo Fire Department, Suppression, Operations, Fire Station 2, website: https://www.elsegundofd.org/suppression/operations/fire-station-2. Accessed July 2023.

City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed July 2023.

City of El Segundo. El Segundo General Plan, Chapter 10, Public Safety Element. Adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=366. Accessed July 2023.

City of El Segundo, City of El Segundo General Plan Draft EIR, adopted December 1991.

City of El Segundo, Pacific Coast Commons Specific Plan EIR, February 2021.

Email correspondence with Casey Snow, Battalion Chief, Segundo Fire Department, dated August 9, 2023.

Email correspondence with Paul Rottenberg, Fire Stats, LLC, dated August 29, 2023.

Los Angeles County GIS Data Portal, Fire Hazard Severity Zone Map, website: https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=d2ea45d15c784adfa601e84b38060c4e. Access July 2023.

IV. Environmental Impact Analysis

K. Public Services

2. Police Protection

1. Introduction

This section describes the existing police protection services of the El Segundo Downtown Specific Plan Update (Project) area, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on a review of relevant online data from the City of El Segundo's (City) website and email correspondences with the El Segundo Police Department (ESPD). For the relevant information, refer to **Appendix H**, of this this Draft Environmental Impact Report (Draft EIR). Other sources consulted are listed in **Section IV.K.2.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

The ESPD is located at 348 Main Street, adjacent to Fire Station 1. The ESPD provides police protection services to the City through Administrative Services Bureau and the Field Operations Bureau. The Administrative Services Bureau is managed by a Police Captain, with support from professional staff. The Field Operation Bureau is the department's largest bureau with the most personnel assigned. The Field Operation Bureau consists of the Patrol Division and the Special Operations Division. The primary function of the Patrol Division is to patrol the city, enforce penal and traffic statues, and assist the public. The Patrol Division accomplishes this by maintaining a visible presence in the community, responding to calls-for-service and conducting proactive preventive patrol. The Patrol Division uses the Area Command Program, which divides the City into two geographic areas that are managed by two lieutenants. The Project area is in the area west of Pacific Coast Highway, which is designated the West Command, and the area east of Pacific Coast Highway is the East Command. The Special Operations Division is responsible for monitoring traffic in the City, parking enforcement, animal control, K-9, and SWAT Team operations.[1]

[1] *City of El Segundo Police Department, About ESPD, Bureaus, website: https://www.elsegundopd.org/about-espd/bureaus. Accessed August 2023.*

a) Staffing

The ESPD currently staffs 88 authorized positions, of which 57 are sworn in. The ESPD has communicated that the desired level of sworn officers is 72. The specific staffing is as follows:

- Chief: 1
- Captains: 2
- Lieutenants: 4
- Sergeants: 11
- Officers: 39
- Non-sworn personnel: 31[2]

ESPD staffs at least one sergeant plus four patrol officers during dayshift, but this number will go down to a minimum number of three officers depending on staffing situations, or slightly increase during evening shifts. Additionally, at least one motorcycle officer is deployed during the dayshift to address traffic concerns. Based on ESPD's estimated total service population of 16,622 residents, the ESPD currently has an officer-to-resident ratio of 3.43 officers for every 1,000 residents (57 officers/16,622 residents = 0.0034 x 1,000 = 3.43). However, as the desired level of sworn officers is 72, the desired level of officer-to-resident ratio would be 4.3 officers for every 1,000 residents (72 officers/16,622 residents = 0.0043 x 1,000 = 4.3).[3]

b) Response Times

Police response is managed by the South Bay Regional Public Communications Authority (SBRPCA). Non-emergency and emergency calls are routed through the system. Police response times are evaluated and managed by the ESPD. The average response time to emergency calls for service City-wide was 3:22 minutes for emergencies and 4:53 minutes for other calls for service.[4]

3. Relevant Plans, Policies, and Ordinances

a) Federal

There are no federal programs, policies, or regulations related to police protection that are applicable to the Project.

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2 *Email correspondence with Hugo Perez, Police Captain, El Segundo Police Department, dated September 21, 2023. Refer to* ***Appendix H*** *of this Draft EIR.*

3 *Email correspondence with Hugo Perez, Police Captain, El Segundo Police Department, dated September 21, 2023. Refer to* ***Appendix H*** *of this Draft EIR.*

4 *Email correspondence with Hugo Perez, Police Captain, El Segundo Police Department, dated September 21, 2023. Refer to* ***Appendix H*** *of this Draft EIR*.

b) State

(1) California Vehicle Code, Section 21806

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.[5] This section of the CVC states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety....(c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.*

(2) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services. Section 35 at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[6]

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[5] *A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.*

[6] *City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847, website: https://caselaw.findlaw.com/ca-court-of-appeal/1719667.html. Accessed August 2023.*

(3) California Penal Code

All law enforcement agencies in California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

c) Regional and Local

(1) County of Los Angeles Office of Emergency Management

The County of Los Angeles Office of Emergency Management (OEM), established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.[7]

Los Angeles County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. This ensures adequate resources should an emergency arise that requires immediate response by more law enforcement personnel than would be available to ESPD using only its own available resources.

(2) City of El Segundo General Plan

The following goal outlined in the City of El Segundo General Plan Land Use Element is relevant to the Project:[8]

Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.

Objective LU7·1: Provide the highest and most efficient level of public services and public infrastructure financially possible.

Objective C1-2: Provide a circulation system consistent with current and future engineering standards to ensure the safety of the residents, workers and visitors of El Segundo.

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[7] *County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, website: https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf. Accessed August 2023.*

[8] *City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed August 2023.*

Policy C1-1.8: Provide all residential, commercial and industrial areas with efficient and safe access for emergency vehicles.

(3) El Segundo Municipal Code – Title 15, Chapter 32 Development Impact Fees

This chapter of the municipal code was adopted pursuant to the City's police powers and the mitigation fee act for the purpose of imposing fees on applicants seeking to construct development projects. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the City's public services and public facilities. Toward that end, the City intends that applicants for such development projects pay their fair share of the costs of providing such public services and public facilities. Accordingly, the amount of each impact fee is calculated based upon the gross square footage of nonresidential development, number of residential dwelling units, type or density or intensity of use, vehicle trip generation, or other appropriate methodology, which ensures that the fee is roughly proportional to the impacts of new development on public facilities. The City assumes responsibility for and will pay for with general city revenues all public facility needs for existing development (Ord. 1389, 12-6-2005). This chapter applies to all fees imposed by the City to finance public facilities attributable to new development, including the following (Ord. 1389, 12-6-2005):

A. Law enforcement facilities, vehicles, and equipment,
B. Fire suppression facilities, vehicles, and equipment,
C. General facilities, vehicles, and equipment,
D. Community library facilities and collections,
E. Public use (community centers) facilities,
F. Parks/open space and recreation facilities; and
G. Road project construction, right of way acquisition, and engineering.

(4) El Segundo Municipal Code – Title 13, Chapter 20 Security Code

The purpose of this chapter of the municipal code is to provide minimum standards to safeguard property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of buildings and structures subject to the provisions of this code within the City, as specified in Section 14051 of the California Penal Code relating to building safety (Ord. 1540, 12-6-2016). The provisions of this code apply to new construction and to buildings or structures to which additions, alterations, or repairs are made. The enforcement of this code is the responsibility of the City's Building Safety Division and the ESPD (Ord. 1540, 12-6-2016) and no certificate of occupancy will be issued unless the applicant has complied with the code.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate Project impacts to police services are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to police services would occur if the Project would:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.***

b) Analysis of Project Impacts

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

(1) Construction

Construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As provided above, in **Mitigation Measure (MM) PS-1** (refer to in **Section IV.K.1, Public Services-Fire**), project applicants of future projects would implement temporary security measures, including security fencing, lighting, and locked entry to secure sites during construction. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

Project construction could also potentially impact the provision of ESPD services and police response in the Project vicinity as a result of construction impacts to the surrounding roadways. Construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from sites, and construction worker trips. Thus, although construction activities would be short-term and temporary, construction activities could temporarily affect emergency vehicles response times. However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Management Plan would be implemented during construction pursuant to **MM PS-1** (refer to in **Section IV.K.1, Public Services-Fire**), to ensure that adequate and safe access remains available within and near sites

during construction activities. Future development would also employ temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to sites and traffic flow are maintained on adjacent rights-of-way. Furthermore, Section 21806 of the California Vehicle Code allows drivers of police emergency vehicles to have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above analysis, upon implementation of the project design features and compliance with State law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the ESPD to serve the Specific Plan area. Future construction would not necessitate the provision of new or physically altered facilities in order to maintain the ESPD's capability to serve the Specific Plan area; accordingly, there would be no adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on police protection services during construction would be less than significant with implementation of **MM PS-1**.

(2) Operation

As previously discussed, the Specific Plan area is served by the West Command of the ESPD located at Civic Center Complex at 348 Main Street. Although there is no direct proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls for police response to commercial and vehicle burglaries, damage to vehicles, traffic-related incidents, the on-site sale and consumption of alcohol and crimes against persons could increase with the increase in on-site activity and increased traffic on adjacent streets and arterials. Such calls are typical of problems experienced in nearby neighborhoods and do not represent unique law enforcement issues specific to the Specific Plan area. Future development would be subject to ESMC Title 13, Chapter 20, which provides minimum standards to safeguard property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of buildings and structures. Design features that deter crime, including adequate and strategically positioned functional lighting to enhance public safety, minimizing visually obstructed and infrequently accessed "dead zones," and limiting public access to properly patrolled public areas, reduce the demand for police services. The design of future development in the Specific Plan area would also include crime prevention features, such as nighttime security lighting and secured parking facilities. With implementation of these features, in coordination with the ESPD, the Project would result in a less-than-significant operational impact on police protection services and no mitigation would be required.

(a) Officer-to-Population Ratio

The increase in employees and visitors to the Specific Plan area during operation could increase demand for police protection services. As discussed in **Section III, Project Description**, of this

Draft EIR, the Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. As discussed in **Section IV.J, Population and Housing**, of this Draft EIR, the Project would be expected to generate 1,057 full- and part-time jobs and 732 residents. It is assumed that the increase in new employees, visitors, and residents would create demand for additional police protection services to the Project Site. As previously discussed, based on ESPD's estimated total service population of 16,622 residents,[9] the current officer to population ratio within the ESPD service area is 3.4 officers per approximately 1,000 persons (57 sworn officers/16,622 residents = 0.0034 x 1,000 = 3.4). It is assumed that the addition of 732 residents would not create the demand for additional sworn officers as it would result in 3.3 sworn officers per approximately 1,000 persons (57 sworn officers/17,354 residents = 0.0033 x 1,000 = 3.3).

However, note that the population increase from the Project is also due to employees. The City has an estimated 73,800 employees.[10] Therefore, the current officer to employee ratio within the ESPD service area is 0.77 officers per approximately 1,000 persons (57 sworn officers/73,800 employees = 0.00077 x 1,000 = 0.77). It is assumed that the addition of 1,057 full- and part-time jobs would not create the demand for additional sworn officers as it would result in 0.76 sworn officers per approximately 1,000 persons (57 sworn officers/74,857 employees = 0.00076 x 1,000 = 0.76). Therefore, the Project would not represent a significant change in the officer-per-resident or officer-per-employee ratio of the service area.

Furthermore, future development would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. Building and layout design would also include crime prevention features, such as nighttime security lighting and a secure parking structure enclosed within each building. These preventative and proactive security measures would decrease the amount of service calls the ESPD would receive.

Additionally, the ESPD would review designs of new development and provide guidance on design features that would minimize the opportunity for crime, which would minimize demand police protection services. Overall, no new or expanded police station is anticipated to be needed as a result of the Project. Therefore, Project impacts on police service ratios would be less than significant and no mitigation would be required.

(b) Response Times

As discussed in **Section IV.L, Transportation**, of this Draft EIR, the proposed Project is estimated to result in a less than significant transportation impact based on methodology and

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[9] *Email correspondence with Hugo Perez, Police Captain, El Segundo Police Department, dated September 21, 2023. Refer to **Appendix H** of this Draft EIR.*

[10] *City of El Segundo, El Segundo Downtown Specific Plan, May 2023, Public Review Draft, page 6-3 and U.S. Census Bureau, QuickFacts: El Segundo City and Los Angeles County, website: https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia,elsegundocitycalifornia,US/POP010220. Accessed August 2023.*

thresholds established in the El Segundo SB 743 Implementation Guidelines. As previously discussed, police units are most often in a mobile state; therefore, it is unknown precisely which route the ESPD would use to access the Project Site when responding to an emergency call. Response times would not be substantially affected, given that there would not be significant traffic impacts and given the availability of alternative routes within the street pattern in the area surrounding the Specific Plan area. In addition, the police have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Furthermore, upon completion of a development within the Specific Plan area, the ESPD would be provided with a diagram of the property, and this diagram would include access routes and any additional information that may facilitate police response to a new development. Therefore, Project impacts related to response times would be less than significant and no mitigation would be required.

(c) Emergency Access

Emergency vehicle access to the Specific Plan area would continue to be provided from major roadways adjacent to the Project Site. Future development in the Specific Plan area would be designed and constructed in accordance with ESMC requirements to ensure proper emergency access. Furthermore, increases in traffic would not greatly affect police vehicles for the reasons discussed under Response Times, above. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of the Project, and impacts to emergency service would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

The geographic scope of the cumulative police protection analysis encompasses the service area for the ESPD. The Project, in combination with the construction and operation of the related projects, would add residential, office, industrial, and commercial land uses to the service area. As detailed in **Section II, Environmental Setting**, development of the identified related projects would allow an increase of approximately 5,293 residents and 15,131 additional jobs. Accordingly, cumulative development, including the Project, would allow for up to 6,025 new residents and 16,188 additional jobs within the City. It is anticipated that the additional resident and employment populations would increase the demand for police protection services in the West Command area. Specifically, there would be increased demand for additional ESPD staffing, equipment, and facilities over time.

The ESPD determines the adequacy of police protection using the existing number of police officers in the Project's police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that the Project would introduce to the area and the geographic distribution of crimes within the area. ESPD works with developers of projects to minimize demand for police services through review and coordination of project design, provision of adequate light, and on-site security measures, as warranted. The related projects are expected to have access to the expertise of the ESPD to benefit their design and operational planning, and similar to the Project, future development would be subject to ESPD review of site plans, and security measures. Through this

process, cumulative demand for police services within the West Command area would be managed, and the Project, in combination with related projects, would not result in a cumulatively considerable impact.

In addition to the capabilities of the West Command area to serve the Project Site and surrounding areas, including related projects, growth in residential population and development throughout the City could increase demand for ESPD staffing, equipment, and facilities Citywide. These demands are met by ESPD through the allocation of available resources by ESPD management to meet varying needs throughout the City, as well as through the allocation of City resources between ESPD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of these existing management and regulatory processes, the cumulative demand for police protection is identified and addressed to the satisfaction of the City's elected leadership. Therefore, cumulative impacts related to police protection would be less than significant and no mitigation would be required.

6. Mitigation Measures

See **MM PS-1**.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to police protection services would be significant. However, with the incorporation of **MM PS-1** construction-related impacts to police protection would be reduced to a level of less than significant. Project-level and cumulative operational impacts with regard to police protection would be less than significant.

8. References

City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed August 2023.

City of El Segundo Police Department, About ESPD, Bureaus, website: https://www.elsegundopd.org/about-espd/bureaus. Accessed August 2023.

City of El Segundo, Pacific Coast Commons Specific Plan EIR, February 2021.

City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847, website: https://caselaw.findlaw.com/ca-court-of-appeal/1719667.html. Accessed August 2023.

County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, website: https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf. Accessed August 2023.

Email correspondence with Hugo Perez, Police Captain, El Segundo Police Department, dated September 21, 2023.

IV. Environmental Impact Analysis

K. Public Services

3. Schools

1. Introduction

This section describes the existing school services of the El Segundo Downtown Specific Plan Update (Project) area, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on a review of relevant online data from the El Segundo Unified School District (ESUSD) website and written correspondence with the El Segundo Unified School District (ESUSD). For the relevant information, refer to **Appendix H**, of this Draft EIR. Other sources consulted are listed in **Section IV.K.3.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

The ESUSD provides public educational services to the City and the Project area. ESUSD currently has an enrollment of 3,400 students at six schools. The Specific Plan Update area is served by four of these ESUSD schools. **Table IV.K.3-1, Public Schools Serving the Project Area**, identifies these Project-area-serving schools and details their locations, sizes, enrollments, and capacity statuses. In addition to the ESUSD public schools, there are private and charter schools within the City. The Wiseburn School District, is a school district serving students from Hollyglen and the surrounding unincorporated Los Angeles County. The Wiseburn and Da Vinci schools within the Wiseburn School District serve nearly 4,200 students at eight schools. Additionally, the Vistamar School is a private independent high school within the City.[1]

[1] *City of El Segundo, El Segundo Business Page, Why El Segundo, Lifestyle, Schools/Residential, website: https://www.elsegundobusiness.com/why-el-segundo/lifestyle/schools-residential. Accessed August 2023.*

Table IV.K.3-1
Public Schools Serving the Project Area

School	Address	Size (square feet)	Enrollment (2023)	Capacity (2023)
Richmond Street Elementary School	615 Richmond Street	30,000	591	At Capacity
Center Street Elementary School	700 Center Street	72,200	795	At Capacity
El Segundo Middle School	332 Center Street	51,500	822	At Capacity
El Segundo High School	640 Main Street	132,101	1,296	At Capacity

Source: Correspondence from El Segundo Unified School District, Kim Linz, Chief Business Official, August 7, 2023 and El Segundo Unified School District, El Segundo USD Long-Range Facilities Master Plan 2018–2028. November 1, 2018, website: https://core-docs.s3.amazonaws.com/documents/asset/uploaded_file/1872650/ESUSD_LRFMP__2018-2028__11_05_18.pdf. Accessed August 2023.

The ESUSD offers residents in the City the option to choose where they would like their K–5 children to attend school, based on space availability. The Project area is within the service area of Richmond Street Elementary (grades K–5), Center Street Elementary School (K-5), El Segundo Middle School (grades 6–8), and El Segundo High School and Arena Continuation High School (grades 9–12).

In 2018, the ESUSD completed its Long-Range Facilities Master Plan to assess and prioritize the current and future facility needs; identified costs to modernize, renovate, and/or add facilities; bring technology infrastructure to current standards; and transport learning spaces to meet future students' needs. To address these critical needs, the Long-Range Facility Master Plan describes a number of projects to be completed during the long-range planning timeline 2020–2028 for each of the ESUSD schools.[2] According to ESUSD, the student generation factors are provided in **Table IV.K.3-2, ESUSD Student Generation Factors**.

Table IV.K.3-2
ESUSD Student Generation Factors

School Levels	Single-Family Detached Units	Multi-Family Attached Units
Elementary School	0.2447	0.1338
Middle School	0.1220	0.0752
High School	0.1630	0.1063
Total	**0.5297**	**0.3153**

Source: El Segundo Unified School District, Residential and Commercial/Industrial Development School Fee Justification Study, May 11, 2020, Table 5, Adjusted Student Generation Factors.

[2] *El Segundo Unified School District, El Segundo USD Long-Range Facilities Master Plan 2018–2028. November 1, 2018, website: https://core-docs.s3.amazonaws.com/documents/asset/uploaded_file/1872650/ESUSD_LRFMP__2018-2028__11_05_18.pdf. Accessed August 2023.*

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) Title 1 Programs

While public education is generally regulated at the state and local levels, the federal government is involved in providing funding for specialized programs (i.e., school meals, Title 1, Special Education, School to Work, Child Development, and Adult Education). However, these are not used for general educational purposes and are not applicable to the discussion herein.

b) State

(1) California Education Code

Educational services and school facilities for the Project are subject to the rules and regulations of the California Education Code, the California Department of Education (CDE) and governance of the State Board of Education (SBE) (Gov. Code Section 33000, et seq.). The CDE is the government agency responsible for public education throughout the state. With the State Superintendent of Public Instruction, the CDE is responsible for enforcing education law and regulations and for continuing to reform and improve public elementary school, secondary school, childcare programs, adult education, and preschool programs. The CDE oversees funding, and student testing and achievement levels for all state schools. A sector of the CDE, the SBE is the 11-member governing and policymaking body of the CDE that sets Kindergarten through 12th Grade (K–12) education policy in the areas of standards, instructional materials, assessment, and accountability. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.[3]

(2) Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as the Greene Act), enacted in 1998, is a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are

[3] *California Education Code Section 17620(a)(1), website: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=17620. Accessed August 2023.*

unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.[4]

The Greene Act permits the local district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The Act also sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less-than-significant level.[5]

(3) Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998

Proposition 1A, the Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998 (Ed. Code, Section 100400–100405) is a school construction funding measure that was approved by the voters on the November 3, 1998 ballot. This Act created the School Facility Program where eligible school districts may obtain state bond funds.

c) Regional and Local

(1) City of El Segundo General Plan

The following goal outlined in the City of El Segundo General Plan Land Use Element is relevant to the Project:[6]

Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.

Objective LU7-1 Provide the highest and most efficient level of public services and public infrastructure financially possible.

(2) Measure ES

This El Segundo Unified School District General Obligation Bond was passed in 2018. The measure authorizes $92,000,000 in bonds to upgrade classrooms, science labs, libraries, career training facilities, and instructional technology to support student achievement in science, technology, engineering, arts, and math; improve student safety; acquire and construct/repair classrooms, facilities, and sites/equipment; and repair roofs and plumbing/electrical systems.

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[4] *State of California, Office of Public School Construction, School Facility Program Handbook, January 2019.*

[5] *California Government Code Section 65996, website: https://codes.findlaw.com/ca/government-code/gov-sect-65996.html. Accessed August 2023.*

[6] *City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed August 2023.*

(3) Long-Range Facility Master Plan

ESUSD launched a facility master planning initiative in fall 2015, and amended the Long-Range Facility Master Plan in 2018 to accomplish the following goals and objectives: (1) assess and prioritize current and future facility needs; (2) identify associated costs to modernize, renovate and/or add facilities; (3) bring technology infrastructure to current standards; and (4) transform existing learning spaces to better meet the needs of 21st Century learners. The Long-Range Facility Master Plan describes short-term and long-range facility recommendations. The purpose of a Long-Range Facility Master Plan is to identify important facility needs over a 10-year period. This document is a plan that the Board of Education will use to guide ongoing maintenance and care decisions for ESUSD facilities and to identify key facilities modernization and new construction projects based on ESUSD's goals, Board's priorities and funding availability.[7]

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate Project impacts to school services are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to school services would occur if the Project would:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.***

b) Analysis of Project Impacts

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

(1) Construction

The Project would generate part-time and full-time jobs associated with construction of development in the Specific Plan area between the start of construction and Project buildout.

[7] *El Segundo Unified School District, El Segundo USD Long-Range Facilities Master Plan 2018–2028. November 1, 2018, website: https://core-docs.s3.amazonaws.com/documents/asset/uploaded_file/1872650/ESUSD_LRFMP__2018-2028__11_05_18.pdf. Accessed August 2023.*

However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday,
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

As a result, it is likely that the skilled workers anticipated to work on development in the Specific Plan area already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout not result in an adverse physical change in the environment. Therefore, construction-related impacts on school services would be less than significant and no mitigation would be required.

(2) Operation

The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. The Project would directly generate students through the construction of 300 new residential dwelling units. In addition, the Project's commercial uses would generate students since employees of the commercial uses may relocate to the Project Site vicinity. As shown in **Table IV.K.3-3**, **ESUSD Project Student Generation**, using the applicable ESUSD student generation rates for the Project's land uses, the Project would generate approximately 289 new students, consisting of 121 elementary school students (Grades K-6), 70 middle school students (Grades 6–8), and 98 high school students (Grades 9–12). The Project's student generation would result in an increase in students attending Project area schools.

Table IV.K.3-3
ESUSD Project Student Generation

Land Use	Size	Students Generated [a]			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Multi-Family Residential	300 du	40	23	32	95
Retail and Restaurant	130,000 sf	22	12	18	52
Office	200,000 sf	53	31	43	127
Medical Office	24,000 sf	6	4	5	15
Total Projected Students		**121**	**70**	**98**	**289**

Note: du = dwelling unit; sf = square feet

a Based on student generation factors provided in the El Segundo Unified School District, Residential and Commercial/Industrial Development School Fee Justification Study, May 11, 2020. The following student generation rates are applied for residential uses: 0.1338 students per household (grades K-6) (300 x 0.1338=40.14), resulting in 40 (rounded) students, 0.0752 students per household (grades 7-8) (300 x 0.0752=22.56), resulting in 23 (rounded) students, and 0.1063 students per household (grades 9-12) (300 x 0.1063=31.89), resulting in 32 (rounded) students (Table 5). The student generation rate of 0.0022 (employees per square foot) for "Retail and Services" (Table 14) uses is applied for retail and restaurant uses (130,000 x 0.0022 x 0.1816 = 51.94), resulting in 52 (rounded) students. The student generation rate of 0.0035 (employees per square foot) for "Office" (Table 14) uses is applied for office related uses (200,000 x 0.0035 x 0.1816 = 127.12), resulting in 127 (rounded) students. The student generation rate of 0.0035 (employees per square foot) for "Office" (Table 14) uses is applied for medical office related uses (24,000 x 0.0035 x 0.1816 = 15.25), resulting in 15 (rounded) students. Since the ESUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 42 percent elementary school, 24 percent middle school, and 34 percent high school).

Although it is very likely that some of the students generated by the Project would already be enrolled in ESUSD schools, for a conservative analysis, it is assumed that all 289 students generated by the Project would be new to the school district. As previously discussed, students generated by the Project would attend Richmond Street Elementary School, Center Street Elementary School, El Segundo Middle School, and El Segundo High School. Based on existing enrollment and capacity data from ESUSD presented in **Table IV.K.3-1**, **Public Schools Serving the Project Area**, none of the schools have adequate capacity to accommodate the new students generated by the Project under existing conditions.

It should be noted that the number of Project-generated students, who could attend ESUSD schools serving the Project Site, would likely be less than the estimate presented above because this analysis does not include students who may enroll in private schools, charter schools, or participate in home- schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Specific Plan area. Thus, the above analysis is considered conservative and likely overestimates the Project's actual potential to generate new students. Furthermore, through their long-range planning efforts, ESUSD seeks to meet the district goal of maintaining appropriate resources and services by addressing facility maintenance and improvement needs on an ongoing basis.[8] Specific

[8] *El Segundo Unified School District, El Segundo USD Long-Range Facilities Master Plan 2018–2028. November 1, 2018, website: https://core-docs.s3.amazonaws.com/documents/asset/uploaded_file/1872650/ESUSD_LRFMP__2018-2028__11_05_18.pdf, page 1.21. Accessed January 16, 2024.*

improvements identified by the district to increase capacity at existing schools include a new two-story classroom addition (8,000 square-feet), including six flexible classroom/labs slated to open January 2024 at Richmond Street Elementary School.[9]

As previously discussed the Education Code Section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under CEQA. These fees can be collected without special city or county approval, to fund the construction of school facilities necessitated by the impact of residential and commercial development activity.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Pursuant to SB 50, the applicant would be required to pay development fees for schools to ESUSD prior to the issuance of the Project's building permit. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local law. Therefore, with the payment of the applicable school fees, the operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, or other performance objectives for schools. Such impacts on schools are considered less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

As identified in **Section II, Environmental Setting**, of this Draft EIR, there are 13 related projects. As a result of the related projects combined with the Project, there is a potential to cumulatively impact Richmond Street Elementary School, Center Street Elementary School, El Segundo Middle School, and El Segundo High School. Based on the rates provided in the 2020 ESUSD Developer Fee Justification Study, the related projects would generate a total of 3,432 students. As shown in **Table IV.K.3-4**, **Total Cumulative Student Generation**, this total number would consist of 1,444 elementary school students, 823 middle school students, and 1,165 high school students.

As indicated above, the Project would generate a total of approximately 289 new students, consisting of 121 elementary students, 70 middle school students, and 98 high school students. Therefore, as shown in **Table IV.K.3-4, Total Cumulative Student Generation**, the Project, in combination with the related project, would have the potential to generate a cumulative total of 3,721 new school-aged students. This cumulative total would consist of 1,565 elementary

[9] *Correspondence from El Segundo Unified School District, Kim Linz, Chief Business Official, August 7, 2023.*

students, 893 middle school students, and 1,263 high school students. Based on existing and projected enrollment and capacity data from ESUSD (refer to **Table IV.J.3-1**, **Public Schools Serving the Project Area,** above), the schools serving the Project and the related projects would not have adequate capacity to serve the cumulative demand.

Table IV.K.3-4
Total Cumulative Student Generation

Land Use	Size	Students Generated[a]			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Multi-Family Residential	2,169 du	290	163	231	684
Employment	15,131 employees	1,154	660	934	2,748
Total Related Project Students		*1,444*	*823*	*1,165*	*3,432*
Project		***121***	***70***	***98***	***289***
Total Cumulative Students		**1,565**	**893**	**1,263**	**3,721**

Note: du = dwelling unit; sf = square feet

a Based on student generation factors provided in the El Segundo Unified School District, Residential and Commercial/Industrial Development School Fee Justification Study, May 11, 2020. The following student generation rates are applied for residential uses: 0.1338 students per household (grades K-6) (2,169 x 0.1338=290.2), resulting in 290 (rounded) students, 0.0752 students per household (grades 7-8) (2,169 x 0.0752=163.1), resulting in 163 (rounded) students, and 0.1063 students per household (grades 9-12) (2,169 x 0.1063=230.6), resulting in 231 (rounded) students (Table 5). The student generation rate of 0.1816 (households with employees in district) (Table 15) uses is applied for student generation (15,131 x 0.1816 = 2,747.8), resulting in 2,748 (rounded) students. Since the ESUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 42 percent elementary school, 24 percent middle school, and 34 percent high school).

Source: EcoTierra Consulting, Inc., August 2023.

Therefore, the students generated by the Project, in combination with the related projects, would cause a shortage of seats when compared to existing conditions and projected school capacity. This degree of cumulative growth would substantially increase the demand for ESUSD services in the Project area. This shortage would need to be addressed by ESUSD with expansion of these school facilities or building of new schools with additional classrooms to accommodate future attendance. To this end, ESUSD routinely evaluates the conditions of existing facilities, including their capacities, and budgets and plans for capacity increases where the need is identified through their long-range planning efforts. As cumulative development projects are implemented throughout the City, ESUSD would continue to evaluate and monitor both the existing and anticipated population growth and existing and planned school capacities to identify and budget for capacity increases as needed. During the time period between residential development and associated population increases, capacity exceedances could occur at existing ESUSD school facilities. However, as previously discussed, the Project and related projects would be required to pay development impact fees pursuant to AB 50 to the ESUSD Developer Fee office. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the Project and the related projects. Therefore, with payment of these fees, the Project and related project would have a less-than-significant cumulative impact. No mitigation would be required.

6. Mitigation Measures

Project-level and cumulative impacts with regard to school services would be less than significant. Therefore, no mitigation measures would be required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to school services would be less than significant.

8. References

California Education Code Section 17620(a)(1), website: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=17620. Accessed August 2023.

California Government Code Section 65996, website: https://codes.findlaw.com/ca/government-code/gov-sect-65996.html. Accessed August 2023.

City of El Segundo, El Segundo Business Page, Why El Segundo, Lifestyle, Schools/Residential, website: https://www.elsegundobusiness.com/why-el-segundo/lifestyle/schools-residential. Accessed August 2023.

City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed August 2023.

El Segundo Unified School District, El Segundo USD Long-Range Facilities Master Plan 2018–2028. November 1, 2018, website: https://core-docs.s3.amazonaws.com/documents/asset/uploaded_file/1872650/ESUSD_LRFMP__2018-2028__11_05_18.pdf. Accessed August 2023.

State of California, Office of Public School Construction, School Facility Program Handbook, January 2019.

IV. Environmental Impact Analysis

K. Public Services

4. Parks and Recreation

1. Introduction

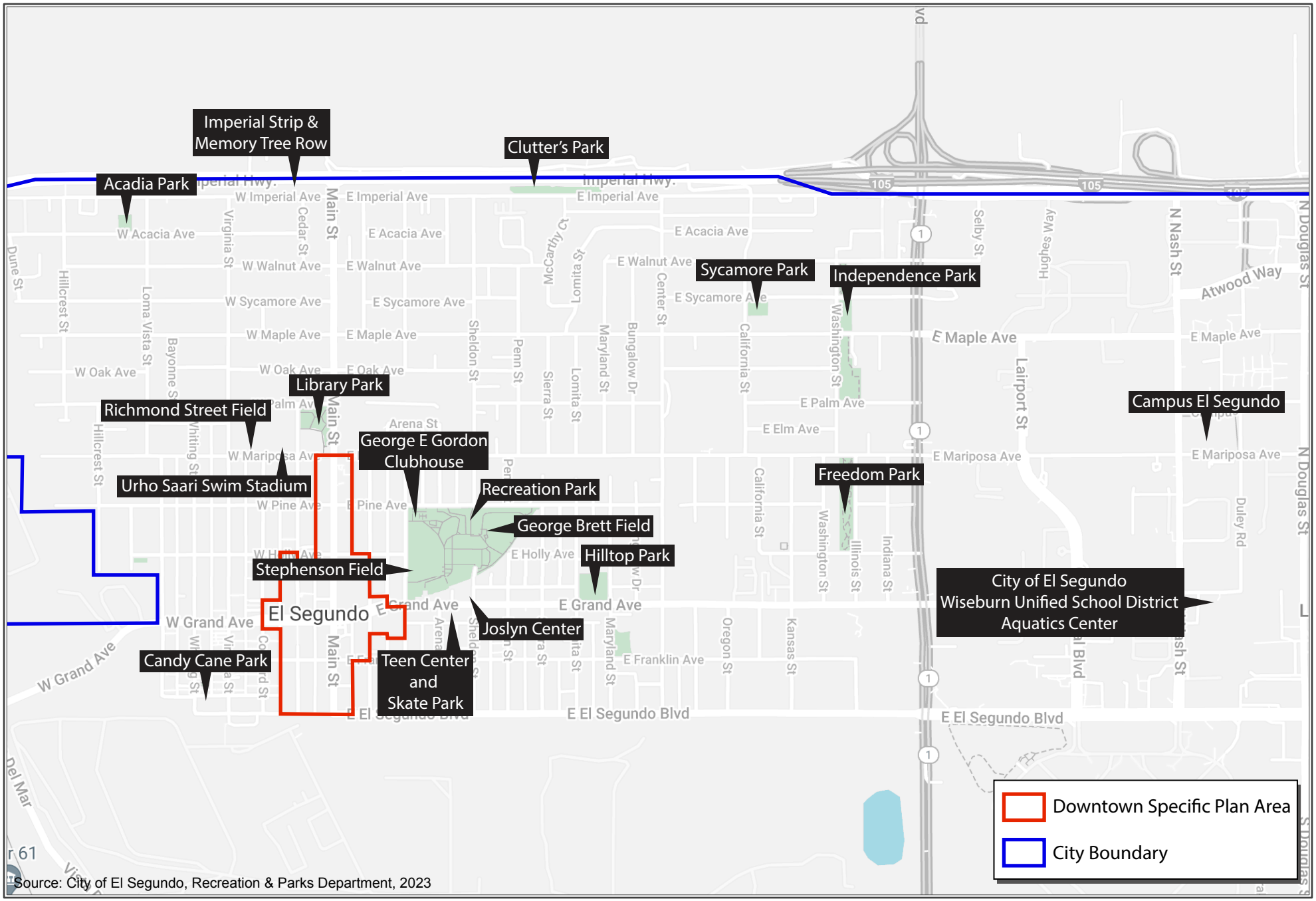
This section describes the existing recreation conditions of the El Segundo Downtown Specific Plan Update (Project) area, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on a review of relevant online data from the City of El Segundo's (City) website written correspondence with the El Segundo Recreation, Parks, and Library Department. For the relevant information, refer to **Appendix H**, of this Draft EIR. Other sources consulted are listed in **Subsection IV.K.4.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Parks and Facilities

The City's Recreation & Parks Department is responsible for developed park land that provides a wide variety of attractions and amenities including more than 16 parks, athletic fields, recreational water amenities, a skate park, dog park and community garden. The locations of City-owned Parks and facilities are shown in **Figure IV.K.4-1, El Segundo Parks and Facilities. Table IV.K.4-1, Parks and Facilities in the City of El Segundo**, indicates the parks and facilities serving the City, including location, amenities, and capacities.



Source: City of El Segundo, Recreation & Parks Department, 2023

Figure IV.K.4-1
El Segundo Parks and Facilities

Table IV.K.4-1
Parks and Facilities in the City of El Segundo

School	Address	Amenities	Capacity
Acacia Park	600 Block of West Acacia Avenue	• Grass Play Area • Park • Picnic Tables • Playground • Water Fountain	—
Campus El Segundo	2201 East Mariposa	• Athletic Field • Available to Rent • Restrooms • Smoke-free • Soccer Fields • Water Fountain	100+
Candy Cane Park	100 Block of Whiting Street	• Grass Play Area • Kid-friendly • Park • Playground	—
Checkout Building	401 Sheldon Street	• Facility • Restrooms • Water Fountain	—
City of El Segundo Wiseburn Unified School District Aquatics Center	2240 East Grand Avenue	• Accessible • Available to Rent • Facility • Parking • Pool • Restroom with Showers • Restrooms • Water Fountain	100+
Clutter's Park	East Imperial Avenue and Sheldon Street	• Park • Picnic Tables	
Constitution Park	Washington Street between Sycamore Street & Maple Avenue	• Grass Play Area • Park	—
El Segundo Dog park	East Imperial Avenue between Sheldon Street and McCarthy Court	• Dog Friendly • Dog Water Fountain • Park • Smoke-free • Water Fountain	—
Freedom Park	Illinois Street between Mariposa Avenue and Holly Avenue	• Grass Play Area • Park • Pet-friendly	—
George Brett Field	Northeast corner of Recreation Park	• Athletic Field • Available to Rent • Ball field • Restrooms • Smoke-free	—

Table IV.K.4-1
Parks and Facilities in the City of El Segundo

School	Address	Amenities	Capacity
George E. Gordon Clubhouse	300 East Pine Avenue	• Air Conditioning • Available to Rent • Facility • Restrooms • Smoke-free • Water Fountain	50–100
Hilltop Park	Corner of Maryland Street and Grand Avenue	• Available to Rent • BBQ Grill • Park • Picnic Tables • Playground • Pool • Restrooms • Water Fountain	—
Holly Valley Park	Corner of West Holly Avenue and Valley Street	• Park • Picnic Tables • Playground	—
Imperial Strip & Memory Tree Row	Imperial Avenue between Hillcrest Avenue and Center Street	• Grass Play Area • Park • Pet-friendly	—
Independence Park	Washington Street between Walnut Avenue and Sycamore Avenue	• Park	—
Joslyn Center	339 Sheldon Street	• Accessible • Air Conditioning • Facility • Parking • Pool Table • Restrooms • TV / Movie Room • Water Fountain	—
Kansas Park	Corner of Kansas Street and Holly Avenue	• Grass Play Area • Park • Picnic Tables • Playground	—
Library Park	600 Block Main Street	• Gazebo • Grass Play Area • Park • Water Fountain	—

Table IV.K.4-1
Parks and Facilities in the City of El Segundo

School	Address	Amenities	Capacity
Recreation Park [1]	401 Sheldon Street	• Accessible • Bag-O Courts • Ball field • Basketball Court • BBQ Grill • Dog Water Fountain • Fire Pit • Grass Play Area • Horseshoes • Park • Parking • Pickleball • Picnic Tables • Ping Pong Table • Playground • Pool • Restrooms • Shuffle Board • Smoke-free • Tennis Courts • Volleyball • Water Fountain	—
Recreation Park Softball Field	Holly Avenue and Eucalyptus Drive	• Athletic Field • Available to Rent • Ball field • Restrooms • Water Fountain	—
Richmond Street Field	Corner of Virginia Street and Mariposa Avenue	• Athletic Field • Available to Rent • Ball field • Water Fountain	—
Stevenson Field	Holly Avenue and Eucalyptus Drive	• Athletic Field • Available to Rent • Ball field • Restrooms	—
Sycamore Park	Corner of Sycamore Avenue and California Street	• BBQ Grill • Grass Play Area • Park • Picnic Tables • Playground • Water Fountain	—

Table IV.K.4-1
Parks and Facilities in the City of El Segundo

School	Address	Amenities	Capacity
Teen Center and Skate Park	405 Grand Avenue	• Accessible • Available to Rent • Basketball Court • Facility • Fitness Center • Kid-friendly • Parking • Pool Table • Restrooms • Skate Park • Smoke-free • TV / Movie Room • Water Fountain	100+
Urho Saari Swim Stadium	219 West Mariposa	• Available to Rent • Facility • Pool • Restroom with Showers • Restrooms • Smoke-free • Water Fountain	50–100
Washington Park	Washington Street between Maple Avenue and Mariposa Avenue	• Grass Play Area • Park • Picnic Tables • Playground	—

"—" = N/A

1 Conceptual plans and detailed engineering plans for Phase One of renovations to Recreation Park are being prepared. Phase One includes: Teen Plaza, including the Teen Center, skatepark, and basketball court immediately adjacent to the Teen Center; improvements to the three ballfields (Brett Field, Stevenson Field, and Softball Field) including field improvements, outfield improvements, score boards, lighting, fencing, and irrigation; tennis, pickleball, paddleball, and racquetball court renovations; and re-imagining an underutilized section of the park including lawn bowling, horseshoe toss, Bag-O, and shuffleboard areas. Source: City of El Segundo, Recreation, Parks, and Library Department, Parks and Facilities Division, Park Project Updates, website: https://www.elsegundorecparks.org/parks-facilities/park-maintenance-division/park-project-updates, accessed August 2023.

Table Source: City of El Segundo, Recreation, Parks, and Library Department, Parks and Facilities Division, Parks and Facilities Directory, website: https://www.elsegundorecparks.org/parks-facilities/parks-facilities-directory, accessed August 2023.

In addition to the 27 parks and facilities identified in **Table IV.K.4-1**, **Parks and Facilities in the City of El Segundo**, the City owns the Lakes at El Segundo, which is operated by the private company, Topgolf. In 2022, the property was renovated to provide an upgraded 10-hole public golf course. The adjacent property is home to a Topgolf facility that includes a three-story lighted driving range with restaurant and private event space.[1] The driving range component of the Topgolf facility functions as the municipal driving range pursuant to a lease agreement with the City of El Segundo. The State of California Department of Parks and Recreation (State Parks)

[1] *Top Golf, El Segundo, website: https://topgolf.com/us/el-segundo/, accessed October 2023.*

typically uses a 3.0-acres-per-1,000-residents ratio as a standard of park space within communities. According to State Parks, there is currently a total of 79.9 acres of qualified[2] park space within the City that is owned/operated by the City; when including the County-owned El Segundo Beach, there is a total of 107.6 acres of qualified park space within the City.[3] Based on the U.S. Census count of 17,272 City residents in 2020 (see **Section IV.J, Population and Housing**), there are approximately 4.6 acres of qualified City-owned park space per 1,000 residents, and approximately 6.2 acres of total qualified park space (including El Segundo Beach) per 1,000 residents. Both the City-owned ratio and total ratio exceed the State Parks standard.

b) Recreation Programs and Activities

The City also offers recreational programs and activities for residents, including: adult sports (coed 7v7 soccer, basketball, coed softball, coed kickball, and pickleball); aquatics (user groups, lap swimming, family swim, water aerobics, and swim lessons); a teen center with a variety of activities and programs for youth in 8th through 12th grades; the Senior Club of El Segundo, which hosts a wide variety of activities and socials at the Joslyn Center (Bingo Fridays, Bowling Wednesdays, Bridge (Mixed) Thursdays, Canasta Tuesdays, Pinochle Wednesdays, Sit-N-Knit 2nd Sunday, free movies, billiards, lawnbowling, Lending Library & Media Room, and On the Move Travel Club); and summer camps. In addition, every Thursday from 3:00 p.m. to 7:00 p.m. on the 300 block of Main Street is the El Segundo Certified Farmers Market. Other community services and programs offered include: El Segundo Connect, a transportation service operating Monday through Friday from 11:30 a.m. to 6:00 p.m. with 16 stops throughout El Segundo; Outreach (home-delivered meals and in-home services); the El Segundo Community Garden located on the north side of the Joslyn Center; and the Park Vista senior living facility. Parks and Facilities also holds special events, offers volunteer opportunities for adults and youth, and offers the Recreation Program Scholarship, providing financial assistance for recreational programs.[4]

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[2] *The State of California Department of Parks and Recreation only considers parks and open space with public access in their calculations of park space within communities. In addition, indoor recreational facilities are not included. For example, Campus El Segundo is not considered by State Parks to be a qualified park due to the restricted, reservation-only access and the Joslyn Center is not included due to its indoor nature. Specific parks and open space included in the City's "qualified" park acreage can be viewed at: California Department of Parks and Recreation, Parks for All Californians, Local Parks Access Planning and Grants, Park Access Tool, website: https://www.parksforcalifornia.org/parkaccess/?overlays1=parks%2Cnoparkaccess&overlays2=parks%2Cparksper1000, accessed October 2023.*

[3] *California Protected Areas Data Portal, website: https://www.calands.org, accessed October 2023.*

[4] *City of El Segundo, Recreation, Parks, and Library Department, Parks and Facilities Division, Recreation Programs & Activities, website: https://www.elsegundorecparks.org/programs-services/recreation-programs-activities, accessed August 2023.*

3. Relevant Plans, Policies, and Ordinances

a) Federal

There are no federal programs, policies, or regulations related to parks and recreation that are applicable to the Project.

b) State

(1) Quimby Act

California Government Code Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative tract map or parcel map.

c) Regional and Local

(1) City of El Segundo General Plan

The following goal, objectives, and policies outlined in the City of El Segundo General Plan Land Use Element is relevant to the Project:[5]

Goal LU7: **Provision of Quality Infrastructure**. Provide the highest quality public facilities, services, and public infrastructure possible to the community.

Objective LU7-1: Provide the highest and most efficient level of public services and public infrastructure financially possible.

The objectives and policies outlined in the General Plan Open Space and Recreation Element relevant to the Project are as follows:[6]

Objective OS1-2: **Private Facilities**. Preserve existing, and support acquisition of additional, private park and recreation facilities to foster recognition of their value as a community recreation and open space resources.

[5] *City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element, adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362, accessed August 2023.*

[6] *City of El Segundo, City of El Segundo General Plan, Chapter 6, Open Space and Recreation Element, adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=364, accessed August 2023.*

Policy OS1-2.4: Require all new residential developments with more than 20 units to provide on-site recreational open space.

Policy OS1-2.5: Encourage, through implementation of development incentives, the development of outdoor private recreational facilities, such as plazas, courtyards, and esplanades, in conjunction with non-residential development.

Objective OS1-3: **Recreation Programs**. Provide recreational programs and facilities for all segments of the community.

Policy OS1-3.3: Encourage multi-family residential developments to provide active open space and recreation facilities which are maintained by homeowners associations.

(2) El Segundo Municipal Code – Title 15, Chapter 32 Development Impact Fees

This chapter of the municipal code was adopted pursuant to the City's police powers and the mitigation fee act for the purpose of imposing fees on applicants seeking to construct development projects. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the City's public services and public facilities. Toward that end, the City intends that applicants for such development projects pay their fair share of the costs of providing such public services and public facilities. Accordingly, the amount of each impact fee is calculated based upon the gross square footage of nonresidential development, number of residential dwelling units, type or density or intensity of use, vehicle trip generation, or other appropriate methodology, which ensures that the fee is roughly proportional to the impacts of new development on public facilities. The City assumes responsibility for and will pay for with general city revenues all public facility needs for existing development (Ord. 1389, 12-6-2005). This chapter applies to all fees imposed by the City to finance public facilities attributable to new development, including the following (Ord. 1389, 12-6-2005):

A. Law enforcement facilities, vehicles, and equipment,
B. Fire suppression facilities, vehicles, and equipment,
C. General facilities, vehicles, and equipment,
D. Community library facilities and collections,
E. Public use (community centers) facilities,
F. Parks/open space and recreation facilities; and
G. Road project construction, right of way acquisition, and engineering.

4. Environmental Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks;***

Threshold (b): ***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; and***

Threshold (c): ***Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.***

b) Impact Analysis

Threshold (a): ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?***

As detailed in **Section IV.J, Population and Housing**, the Project would allow for increases of up to 1,057 new employees and up to 732 residents. Daytime employee populations are not typically park users and any usage by employees would be brief and non-intensive, likely occurring during lunch breaks, which would not be expected to increase deterioration of existing parks or require the construction of new or expansion of existing parks. However, at least a portion of the 732 new residents are anticipated to patronize the various public parks and recreation facilities located in proximity to the Project area.

As detailed above in subsection 2.a, Parks and Facilities, based on a current population count of 17,272 residents, there are approximately 4.6 acres of City-owned park space per 1,000 residents and approximately 6.2 acres of total park space per 1,000 residents. The additional 729 residents that could result from future development under the Specific Plan Update would result in a ratio of 4.4 acres of City-owned qualified park space per 1,000 residents and a ratio of 6.0 acres of total qualified park space per 1,000 residents. As such, there would still be adequate park space within the City according to State Park standards and implementation of the Project would not result in a substantial reduction in existing standards of service for parks. Accordingly, the Project would not result in the need for new or physically altered park facilities to maintain an acceptable

service ratio. In addition, although no specific residential development is proposed under the Project, the Project includes district-specific development standards for the provision of residential private open space, residential common open space, and residential recreation facilities. Residential development within the Project area would be required to meet or exceed these development standards, which would provide an on-site alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project area while reducing impacts to off-site public parks and recreational facilities.

Furthermore, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support park improvements as well as fund capital costs for other new and existing infrastructure. Pursuant to the Development Impact Fee Program, the Project applicant/developer would pay its fair share of the Development Impact Fee based on the fee category and adopted Development Impact Fee rates. The Development Impact Fee paid by the Project would be available to the City to use for such updates and improvements at their discretion. Accordingly, impacts to park facilities as a result of implementation of the Project would be less than significant and no mitigation would be required.

Threshold (b): Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The City's Recreation and Parks Department is responsible for developed park land that provides a wide variety of attractions and amenities including more than 15 parks, athletic fields, recreational water amenities, a skate park, dog park and community garden. In addition, the City also offers recreational programs and activities for residents, including adult sports, swimming classes, a teen center with a variety of activities and programs, and the Senior Club of El Segundo hosts a wide variety of activities and socials at the Joslyn Center. As detailed in **Section IV.J, Population and Housing**, the Project would allow for increases of up to 1,057 new employees and up to 732 residents. Although any usage by employees would be brief and non-intensive, likely occurring during lunch breaks, which would not be expected to increase deterioration of existing parks, at least a portion of the 732 new residents are anticipated to patronize the various public parks and recreation facilities located in proximity to the Project area. However, the Project includes district-specific development standards for the provision of residential private open space, residential common open space, and residential recreation facilities. Residential development within the Project area would be required to meet or exceed these development standards, which would provide an on-site alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project area while reducing impacts to off-site public parks and recreational facilities. Furthermore, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support park improvements as well as fund capital costs for other new and existing infrastructure. As such, the Project's inclusion of development standards would help offset the increased demand for park and recreational facilities, and the payment of the Development Impact Fee would ensure that impacts associated with the use of off-site parks and recreational facilities would be less than significant. No mitigation would be required.

Threshold (c): Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed in response to **Threshold (a)** above, implementation of the Project would not require the construction or expansion of off-site recreational facilities. While the Project does not propose specific development, the Project includes district-specific development standards for the provision of residential private open space, residential common open space, and residential recreation facilities for future development that would occur within the Project area. Furthermore, all development, including ay proposed open space or recreational facilities would be subject to review and approval by the City as part of the normal plan check for a building permit as required by ESMC Section 13-1-2. This mandatory process is intended to ensure compliance with development requirements, codes, and standards and any future development would be required to revise site plans or incorporate changes required by the City during plan check prior to the issuance of building permits. As such, through mandatory plan check and environmental review of future development within the Project area as applicable, the provision of on-site recreational facilities pursuant to the Project's development standards would not have an adverse physical effect on the environment. Impacts would, accordingly, be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

As defined in the State CEQA Guidelines Section 15130, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, present, and probable future projects within the cumulative impact area. The cumulative study area used to assess potential cumulative impacts to parks and recreational facilities includes the City of El Segundo in general and the City's existing and proposed parks and recreational facilities specifically. Cumulative impacts to parks and recreational facilities would result when projects collectively increase demand on parks and recreational services and facilities such that additional facilities or services must be constructed or provided. Related projects, especially those with a residential component, would likely result in an incremental increase in the demand for parks and recreational services and facilities.

As detailed in **Section II, Environmental Setting**, of this Draft EIR, development of the identified related projects would allow an increase of approximately 5,293 residents and 15,131 additional jobs. Accordingly, cumulative development, including the Project, would allow for up to 6,025 new residents and 16,188 additional jobs within the City. As discussed above, park usage by employees would be brief and non-intensive, likely occurring during lunch breaks, which would not be expected to increase deterioration of existing parks or require the construction of new or expansion of existing parks. However, as under the Project, at least a portion of the 6,025 cumulative new residents are anticipated to patronize the various public parks and recreation facilities in the City. The resulting Citywide population of 23,297 residents would result in a park space ratio of approximately 3.4 acres of City-owned qualified park space per 1,000 residents and approximately 4.6 acres of total qualified park space per 1,000 residents. As such, the standards of service for parks would continue to exceed the 3.0-acres-per-1,000-residents

standard following the cumulative addition of up to 6,025 new residents in the City. Furthermore, as with the Project, development of related projects would also be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support park improvements as well as fund capital costs for other new and existing infrastructure. Additionally, cumulative development would be required to demonstrate compliance with CEQA prior to approval; existing federal, state, and local regulations related to parks and recreational facilities would mitigate potential adverse impacts to the environment that may result from the construction or expansion of such facilities. Accordingly, cumulative impacts to parks and recreational facilities would be less than significant and the Project's contribution to the impact would not be cumulatively considerable. No mitigation measures would be required.

6. Mitigation Measures

Project-level and cumulative impacts with regard to parks and recreation would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to parks and recreation would be less than significant.

8. References

California Department of Parks and Recreation, Parks for All Californians, Local Parks Access Planning and Grants, "Park Access Tool," website: https://www.parksforcalifornia.org/parkaccess/?overlays1=parks%2Cnoparkaccess&overlays2=parks%2Cparksper1000.

California Protected Areas Data Portal, website: https://www.calands.org.

City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element, adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362.

City of El Segundo, City of El Segundo General Plan, Chapter 6, Open Space and Recreation Element, adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=364.

City of El Segundo, Recreation, Parks, and Library Department, Parks and Facilities Division, "Park Project Updates," website: https://www.elsegundorecparks.org/parks-facilities/park-maintenance-division/park-project-updates.

City of El Segundo, Recreation, Parks, and Library Department, Parks and Facilities Division, "Parks and Facilities Directory," website: https://www.elsegundorecparks.org/parks-facilities/parks-facilities-directory.

City of El Segundo, Recreation, Parks, and Library Department, Parks and Facilities Division, "Recreation Programs & Activities," website: https://www.elsegundorecparks.org/programs-services/recreation-programs-activities.

City of El Segundo, Smoky Hollow Specific Plan Update, Recirculated Draft EIR, June 22, 2018.

Top Golf, El Segundo, website: https://topgolf.com/us/el-segundo/.

IV. Environmental Impact Analysis

K. Public Services

5. Libraries

1. Introduction

This section describes the existing library services of the El Segundo Downtown Specific Plan Update (Project) area, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on a review of relevant online data from the City of El Segundo's (City) website and written correspondence with the El Segundo Recreation, Parks, and Library Department. For the relevant information, refer to **Appendix H**, of this Draft EIR. Other sources consulted are listed in **Section IV.K.5.8, References,** below.

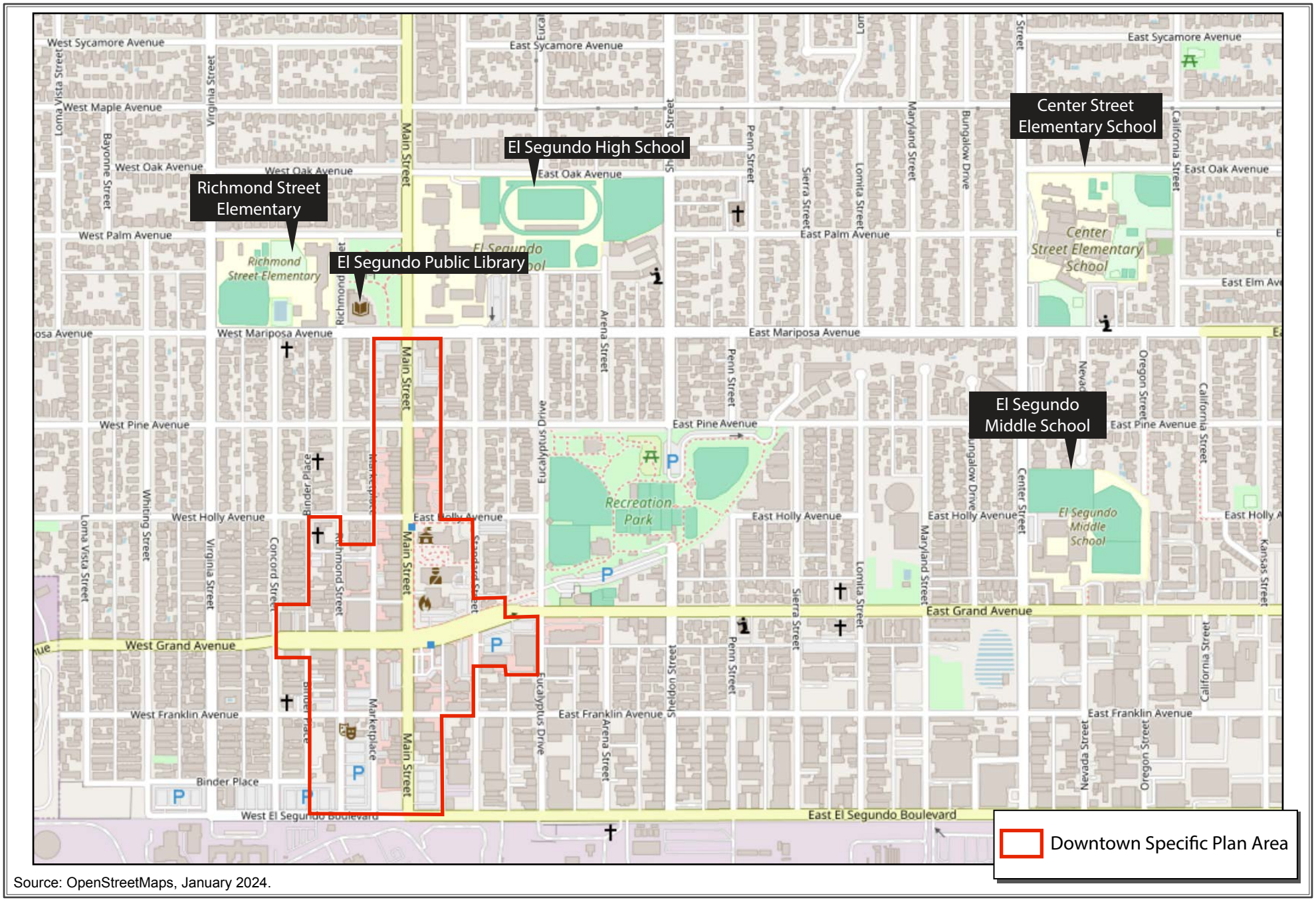
Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

The El Segundo Public Library (ESPL) is located at 111 West Mariposa Street. The ESPL also partners with El Segundo Unified School District (ESUSD) to provide services at four El Segundo school libraries, including El Segundo High School, El Segundo Middle School, Center Street Elementary School, and Richmond Street Elementary School.[1] **Figure IV.K.5-1, El Segundo Public Library Locations**, identifies the ESPL and four El Segundo school libraries.

The ESPL offers a digital library with ebooks and eAudiobooks, as well as online resources including databases, newspapers, magazines, reading sources, and general reference guides. Additionally, the History Committee, part of the Friends of El Segundo Public Library, maintains historic collections of El Segundo's past, including photographs, documents, yearbooks, and other items, in ESPL's History Room. The El Segundo Arts and Culture Advisory Committee and ESPL promote public art, events, and cultural programming in the community.

[1] *City of El Segundo, Recreation, Parks, and Library Department, Library Division, El Segundo Public Library, "School Libraries," website: https://www.elsegundolibrary.org/about-us/school-libraries, accessed August 2023.*



Source: OpenStreetMaps, January 2024.

Figure IV.K.5-1
El Segundo Public Library Locations

Cultural activities throughout the year include public art installations, rotating exhibits and experiences, and a variety of special events. There are also a number of events held at the ESPL for all ages. In 2022/2023, the ESPL had 126,858 visitors; 162,873 items borrowed; 271 community programs; 11,128 program attendance; 42,803 wifi sessions; and 4,204 room reservations.[2]

The Friends of the ESPL is a tax-exempt, non-profit organization of volunteers committed to generating community interest and support for the library. This group relies on membership dues, used-book sales, corporate and private donations, and other various fundraising activities to support the library and fund a variety of program, including the following:[3]

- Summer Reading Programs for all ages
- Adult Literacy Program
- Annual Author Fair
- El Segundo History Committee
- Genealogy and local history services
- Purchase of special books and equipment for the Library
- Educational scholarships for High School students

The American Library Association no longer sets prescriptive standards for libraries in the United States as communities have different needs. The ESPL does use benchmark comparisons to Los Angeles County and California Median input and output measures, however, to help evaluate performance and identify growth opportunities. Data used to calculate input and output measures is obtained from the California Public Libraries Survey, which has conducted annual surveys of libraries' finances, services, programs, and collections since 1988. As shown in **Table IV.K.5-1, El Segundo Public Library Benchmarks**, data from fiscal year 2021-2022 (the most recent data available) indicates that the ESPL exceeds all input and output measures benchmarks as compared to the LA County Library system and the median of all California public libraries.[4]

Table IV.K.5-1
El Segundo Public Library Benchmarks

Benchmark	El Segundo Public Library	Los Angeles County Library	California Median
Input Measures			
Square feet per capita	2.5 (42,021 square feet)	0.3	0.5
Internet Terminals per 1,000	0.6 (10 terminals)	0.6	0.5
Physical Items per capita	6.2 (106,713 items)	1.3	1.8
Output Measures			
Annual Circulation per capita	9.4 (160,728)	4	3.7

[2] *City of El Segundo, Recreation, Parks, and Library Department, Library Division, El Segundo Public Library, "2022 / 2023 By the Numbers," website: https://www.elsegundolibrary.org/home-library, accessed August 2023.*

[3] *City of El Segundo, Recreation, Parks, and Library Department, Library Division, El Segundo Public Library, "Friends of the Library," website: https://www.elsegundolibrary.org/about-us/friends-of-the-library, accessed August 2023.*

[4] *California State Library, California public Libraries Statistics, Fiscal Year, 2021-2022, available at https://www.library.ca.gov/stats/, accessed October 9, 2023.*

Table IV.K.5-1
El Segundo Public Library Benchmarks

Benchmark	El Segundo Public Library	Los Angeles County Library	California Median
Annual Program Attendance per capita	0.4 (6,515 attendance)	0.03	0.1
Annual Public Computer Use per 1,000	284.2 (4,855 sessions)	142.9	122.4
Percent of Population Registered	75% (12,854 registered)	67%	59%
Library Visits per capita	9.9 (168,413 visits)	1.0	1.5
Circulation of Electronic Materials	14,200	6,800,472	47,785
Source: California State Library, California public Libraries Statistics, Fiscal Year, 2021-2022.			

3. Relevant Plans, Policies, and Ordinances

a) Federal

There are no federal programs, policies, or regulations related to libraries that are applicable to the Project.

b) State

There are no State programs, policies, or regulations related to libraries that are applicable to the Project.

c) Regional and Local

(1) City of El Segundo General Plan

The following goal and objective outlined in the City of El Segundo General Plan Land Use Element is relevant to the Project:[5]

Goal LU7: **Provision of Quality Infrastructure**. Provide the highest quality public facilities, services, and public infrastructure possible to the community.

Objective LU7-1: Provide the highest and most efficient level of public services and public infrastructure financially possible.

(2) El Segundo Municipal Code – Chapter 32 Development Impact Fees

This chapter of the municipal code was adopted pursuant to the City's police powers and the mitigation fee act for the purpose of imposing fees on applicants seeking to construct development projects. The purpose of such fees is to minimize, to the greatest extent practicable, the impact

[5] *City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element, adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362, accessed August 2023.*

that new development has on the City's public services and public facilities. Toward that end, the City intends that applicants for such development projects pay their fair share of the costs of providing such public services and public facilities. Accordingly, the amount of each impact fee is calculated based upon the gross square footage of nonresidential development, number of residential dwelling units, type or density or intensity of use, vehicle trip generation, or other appropriate methodology, which ensures that the fee is roughly proportional to the impacts of new development on public facilities. The City assumes responsibility for and will pay for with general city revenues all public facility needs for existing development (Ord. 1389, 12-6-2005). This chapter applies to all fees imposed by the City to finance public facilities attributable to new development, including the following (Ord. 1389, 12-6-2005):

A. Law enforcement facilities, vehicles, and equipment,
B. Fire suppression facilities, vehicles, and equipment,
C. General facilities, vehicles, and equipment,
D. Community library facilities and collections,
E. Public use (community centers) facilities,
F. Parks/open space and recreation facilities; and
G. Road project construction, right of way acquisition, and engineering.

4. Environmental Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries.***

b) Analysis of Project Impacts

Threshold (a): ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries?***

Other public facilities and services provided within the City include library services. Library services within the City are provided by the ESPL, located at 111 West Mariposa Street, immediately across Mariposa Street from the northwest corner of the Project area. As discussed above, the ESPL exceeds all input and output measures benchmarks as compared to the LA

County Library system and California public libraries median used to help evaluate performance and identify growth opportunities. As detailed in **Section IV.J, Population and Housing**, the Project would allow for increases of up to 1,057 new employees and up to 732 residents. It is possible the employees of the Project would use the City's library services; however, even if employees use the library, such usage would not be expected to be of a volume of frequency that would overburden the current facilities. The addition of up to 732 new residents would also not have the potential to substantially alter the ESPL's input and output measures benchmarks previously presented in **Table IV.K.5-1, El Segundo Public Library Benchmarks**. Accordingly, the Project would not result in the need for new or physically altered library facilities to maintain acceptable performance objectives.

Furthermore, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support library improvements as well as fund capital costs for other new and existing infrastructure. Pursuant to the Development Impact Fee Program, the Project applicant/developer would pay its fair share of the Development Impact Fee based on the fee category and adopted Development Impact Fee rates. The Development Impact Fee paid by the Project would be available to the City to use for such updates and improvements at their discretion. Accordingly, impacts to library facilities and services as a result of implementation of the Project would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

As defined in the State CEQA Guidelines Section 15130, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, present, and probable future projects within the cumulative impact area. The cumulative study area used to assess potential cumulative impacts to the ESPL includes the City of El Segundo in general and the ESPL specifically. Cumulative impacts to the ESPL would result when projects collectively increase demand on library services, programs, and facilities such that additional facilities must be constructed and/or services and programs provided. Related projects, especially those with a residential component, would likely result in an incremental increase in the demand for library services, programs, and facilities.

As detailed in **Section II, Environmental Setting**, of this Draft EIR, development of the identified related projects would allow an increase of approximately 5,293 residents and 15,131 additional jobs. Accordingly, cumulative development, including the Project, would allow for up to 6,025 new residents and 16,188 additional jobs within the City. As discussed above, employee usage of library facilities would not be expected to be of a volume of frequency that would overburden the current facilities. However, the cumulative increase of 6,025 new residents would result in a Citywide population of 23,297 residents, which would increase the demand for library services within the City. **Table IV.K.5-2, Cumulative Impacts to Library Benchmarks**, presents the resulting changes to the input and output measures benchmarks for the ESPL that would result from full buildout of cumulative development within the City. As shown in **Table IV.K.5-2**, under full cumulative buildout conditions, the ESPL would continue to exceed the performance of the Los Angeles County Library system and the median for all California public libraries under most

Table IV.K.5-2
Cumulative Impacts to Library Benchmarks

Benchmark	Existing ESPL Benchmark	ESPL Benchmark Following Cumulative Development	Los Angeles County Library	California Median
Input Measures				
Square feet per capita	2.5	1.8	0.3	0.5
Internet Terminals per 1,000	0.6	0.4	0.6	0.5
Physical Items per capita	6.2	4.6	1.3	1.8
Output Measures				
Annual Circulation per capita	9.4	6.9	4	3.7
Annual Program Attendance per capita	0.4	0.3	0.03	0.1
Annual Public Computer Use per 1,000	284.2	208.4	142.9	122.4
Percent of Population Registered	75%	55%	67%	59%
Library Visits per capita	9.9	7.2	1.0	1.5
Circulation of Electronic Materials	14,200	14,200	6,800,472	47,785
Source: California State Library, California public Libraries Statistics, Fiscal Year, 2021-2022.				

input and output benchmarks. Furthermore, as with the Project, related projects would also be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support library improvements as well as fund capital costs for other new and existing infrastructure. Additionally, cumulative development would be required to demonstrate compliance with CEQA prior to approval; existing federal, state, and local regulations related to library facilities, services, and programs would mitigate potential adverse impacts to the environment that may result from the construction or expansion of such facilities.

Based on the above, cumulative impacts to library facilities, services, and programs would be less than significant and the Project's contribution to the impact would not be cumulatively significant. No mitigation measures would be required.

6. Mitigation Measures

Project-level and cumulative impacts with regard to the ESPL and other public services would be less than significant. Therefore, no mitigation measures would be required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to the ESPL and other public services would be less than significant.

8. References

California State Library, "California public Libraries Statistics," Fiscal Year, 2021-2022, available at https://www.library.ca.gov/stats/.

City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element, adopted December 1, 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362.

City of El Segundo, Recreation, Parks, and Library Department, Library Division, El Segundo Public Library, "2022 / 2023 By the Numbers," website: https://www.elsegundolibrary.org/home-library.

City of El Segundo, Recreation, Parks, and Library Department, Library Division, El Segundo Public Library, "Friends of the Library," website: https://www.elsegundolibrary.org/about-us/friends-of-the-library.

City of El Segundo, Recreation, Parks, and Library Department, Library Division, El Segundo Public Library, "School Libraries," website: https://www.elsegundolibrary.org/about-us/school-libraries.

IV. Environmental Impact Analysis

L. Transportation

1. Introduction

This section describes the existing transportation conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. The analysis is primarily based on the *El Segundo Downtown Specific Plan Update Transportation Assessment* (TA Report) prepared by Fehr & Peers, dated January 2024, and included in its entirety as **Appendix I.1** of this Draft EIR, as well as the *El Segundo Downtown Specific Plan Update Local Transportation Assessment* (LTA Report) prepared by Fehr & Peers, dated January 26, 2024, and included as **Appendix I.2** of this Draft EIR. Other sources consulted are listed in **Section IV.L.8, References**, below.

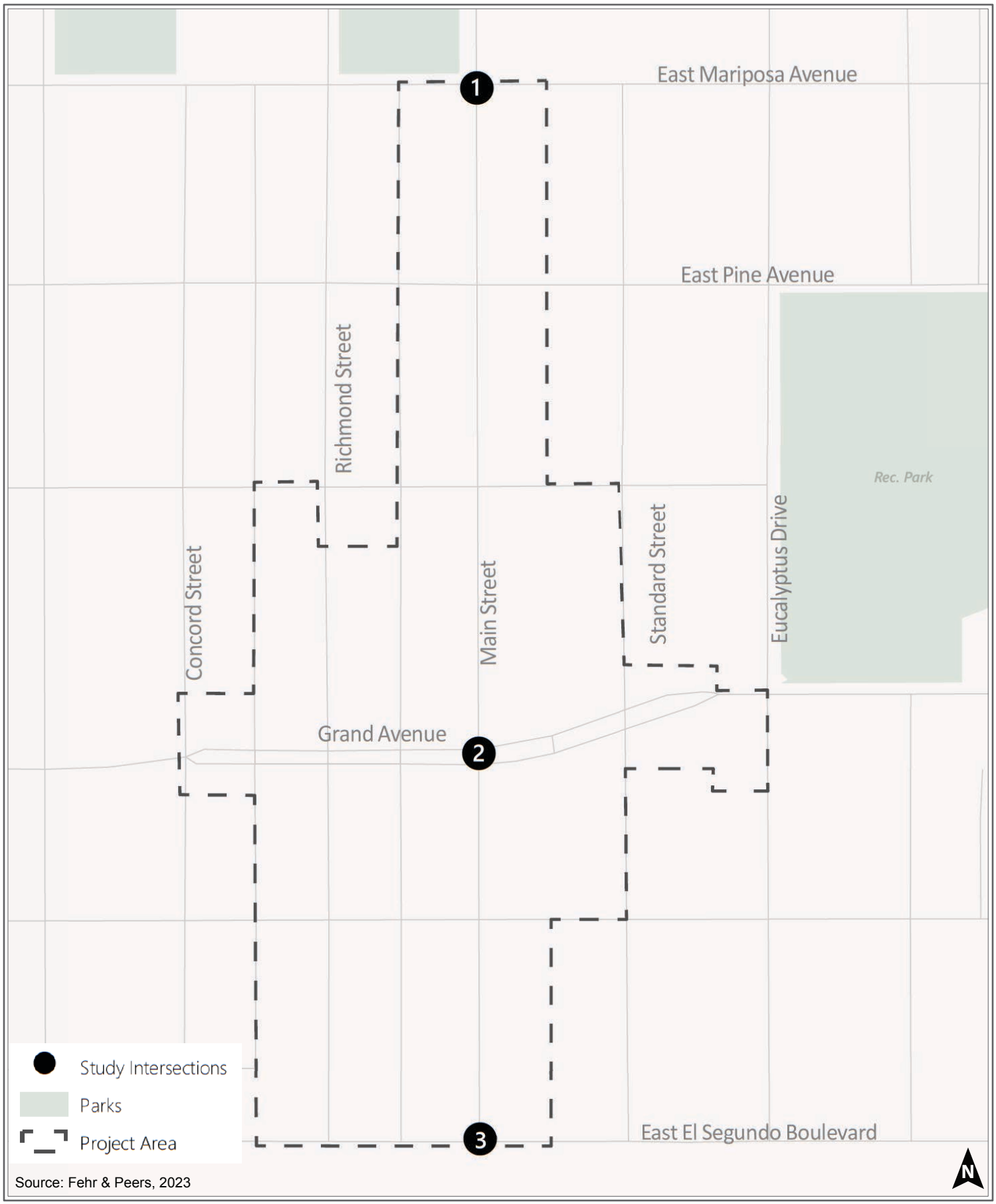
Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

Existing land uses within the Downtown Specific Plan (DSP) Area include retail, restaurant, office, and residential. The DSP Area also includes various civic uses, such as El Segundo City Hall, the El Segundo Police Department (ESPD) headquarters, and El Segundo Fire Department (ESFD) Station #1. Because the Project area defines specific boundaries within which Project land use buildout and conceptual roadway enhancements may occur, the Study Area in this analysis is defined as the Project area, as shown in **Figure IV.L-1, Transportation Study Area**. Thus, the terms Project area and Study Area are used interchangeably in this analysis.

a) Existing Street System

The Project area is located southwest of the interchange of the Interstate 405 Freeway (I-405) and State Route 90 (Imperial Highway), west of Pacific Coast Highway (CA-1) and north of El Segundo Boulevard. The Interstate 105 Freeway (I-105) is north of the Project area, immediately north of Imperial Highway. Regional access to the Project Site is provided by I-105, I-405, and CA-1, with the nearest interchange approximately 1 mile to the northeast (I-105). Major streets serving the Project area include El Segundo Boulevard, Grand Avenue, and Mariposa Avenue in the east-west direction and Main Street in the north-south direction. The characteristics of the major roadways serving the Study Area are described below.



Source: Fehr & Peers, 2023

Figure IV.L-1
Transportation Study Area

(1) Freeways

I-105 is oriented in the east-west direction located north of the Project. Near the Project area, I-105 provides three lanes in each direction. I-105 terminates onto Imperial Highway, providing access to the Project area.

I-405 is a north-south freeway located east of the Project. Located about 2.5 miles from the Project area, I-405 provides five to six lanes in each direction. Access to the Project area is provided via on and off-ramps to El Segundo Boulevard.

(2) East – West Streets

- **El Segundo Boulevard** is designated as a Secondary Arterial (east of Main Street) and a 4-Lane Collector (west of Main Street) and defines a portion of the southern boundary of the Project area. El Segundo Boulevard provides two travel lanes in each direction. El Segundo Boulevard provides access to and from I-405, which is approximately 2.5 miles east of the Project area.

- **Grand Avenue** is designated as a Secondary Arterial and bisects the Project area east-west. Grand Avenue provides access to the Vista Del Mar, west of the Project area. Grand Avenue includes two travel lanes in each direction with parking permitted on both sides of the street and both sides of the median. Grand Avenue is also a "sharrowed" (shared vehicle-bicycle lane marking) bicycle route. Grand Avenue is a dedicated truck route, and the speed limit is 25 mph.

- **Mariposa Avenue** is designated as a 2-Lane Collector (east of Main Street) and a Local Street (west of Main Street) and forms portions of the northern boundary of the Project area. Mariposa Avenue provides one travel lane in each direction, with parking on some segments.

- **Imperial Highway** is designated as a Secondary Arterial oriented east-west and is located approximately 0.9 miles north of the Project area. Imperial Highway provides two travel lanes in each direction and features Class II bicycle lanes. Northeast of the Project area, Imperial Highway provides access to and from I-105.

(3) North – South Streets

- **Main Street** is designated as a Secondary Arterial (south of Grand Avenue) and a 4-Lane Collector (north of Grand Avenue) and serves as the primary north-south thoroughfare through the Project area. Main Street is the center of commercial activity in the Project area. Main Street provides two travel lanes in each direction and is a "sharrowed" bicycle route. Main Street provides access to and from Imperial Highway to the north and El Segundo Boulevard to the south. The speed limit on Main Street is 25 miles per hour (mph). South of Grand Avenue, Main Street is a truck route, as defined in the General Plan Circulation Element, which is noted by signage.

- South of Holly Avenue, Main Street can accommodate in-road bollards for temporary street closures. Bollards can be mounted in the permanent in-road receptacles to temporarily close approximately 340 feet of Main Street for special events, such as the farmer's market.

- **CA-1** is designated as a Major Arterial and is located approximately one mile east of the Project area. PCH provides four travel lanes in each direction and serves as access to I-105, LAX, and neighboring cities to the south of El Segundo.

- **Vista Del Mar** is designated as a Secondary Arterial, located approximately two-thirds of a mile west of the Project area. Vista Del Mar provides two travel lanes in each direction and serves as the major coastal thoroughfare through El Segundo. From the Project area directly, access to Vista Del Mar is only provided via Grand Avenue.

(4) Intersection Control

There are three signalized intersections in the Project area at: Main Street and Mariposa Avenue; Main Street and Holly Avenue; and Main Street and Grand Avenue. All other intersections include all-way stop control (vehicles on all approaches must stop) or side-street stop control (vehicles on side-street approaches must stop while vehicles on major road approaches do not).

The Project area includes an extensive alleyway network, which provides access to off-street parking, business access, and truck circulation. Most intersections between alleyways and roadways are side-street stop-controlled, though many lack advance stop bars on the alley approach.

b) Existing Public Transit

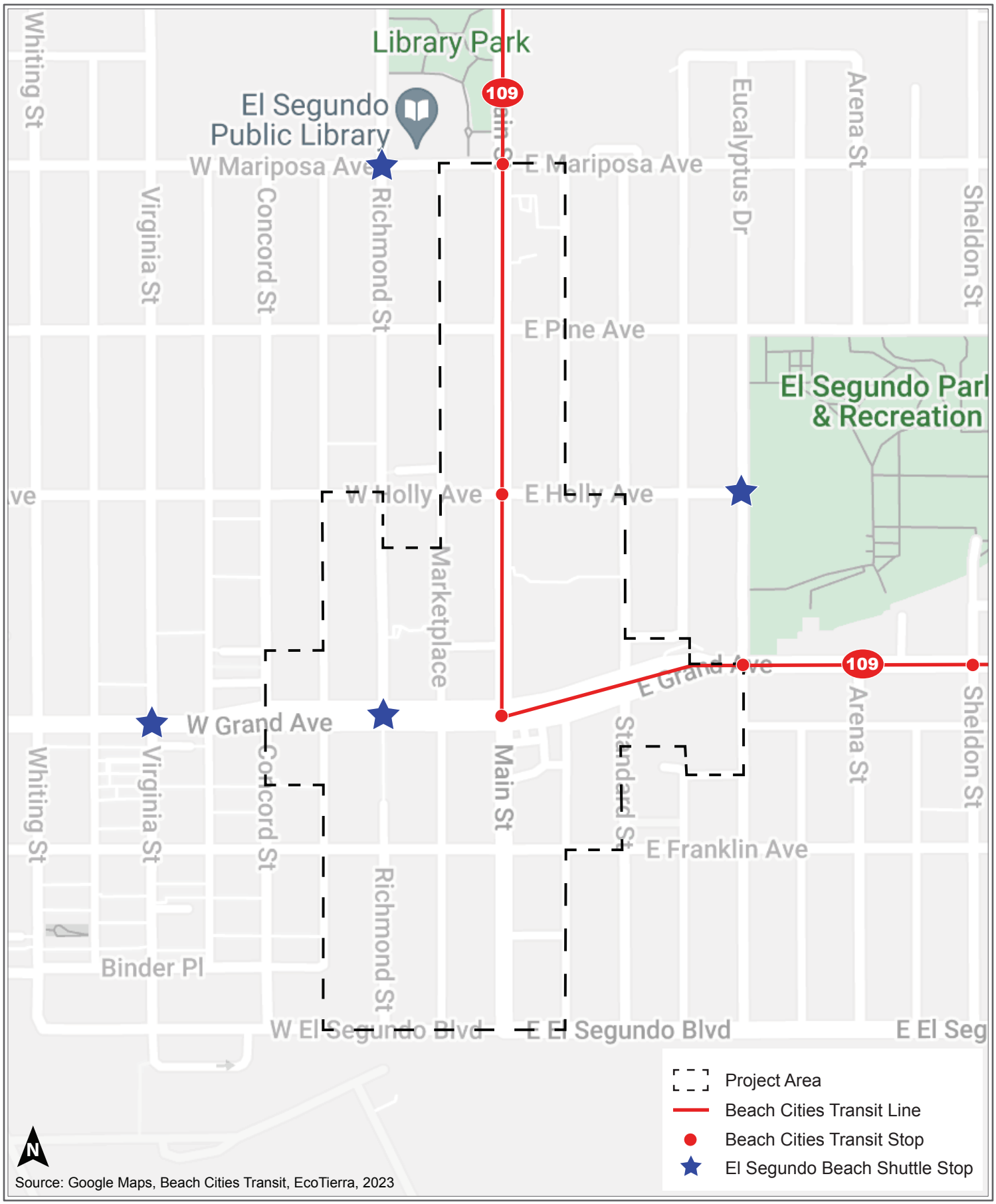
The Project area is served by Beach Cities Transit and City of El Segundo Transportation bus lines. Specific bus lines serving the Project area are shown on **Figure IV.L-2, Existing Transit Routes**, and described below:

Beach Cities Transit Line 109

- Line 109 connects LAX and Torrance via El Segundo, Manhattan Beach, Hermosa Beach, and Redondo Beach. In Downtown El Segundo, this line utilizes along Main Street and Grand Avenue. This line has headways of 40-50 minutes during weekdays.

Lunchtime Shuttle

- Lunchtime Shuttle services were suspended during the COVID-19 pandemic and had not resumed as of Winter 2023. Previously, the City of El Segundo Transportation Lunchtime Shuttle operated on a continuous loop between Downtown El Segundo and the Smoky Hollow area to the east from 11:45 a.m. to 2 p.m. on weekdays.



Source: Google Maps, Beach Cities Transit, EcoTierra, 2023

Figure IV.L-2
Existing Transit Routes

Beach Shuttle

- Following suspended service during the COVID-19 pandemic, the City partnered with Swoop, Inc. to resume Beach Shuttle service for the 2022 summer season. The Beach Shuttle operates between El Segundo and El Porto Beach during the El Segundo Unified School District summer break. There are several stops located near the Project area.

Dial-a-Ride

- The City currently operates Dial-a-Ride service in partnership with Lyft. This service primarily focuses on enhancing accessibility for seniors and disabled residents. The service operates on weekdays and serves the entirety of the Project area.

c) Existing Bicycle and Pedestrian Facilities

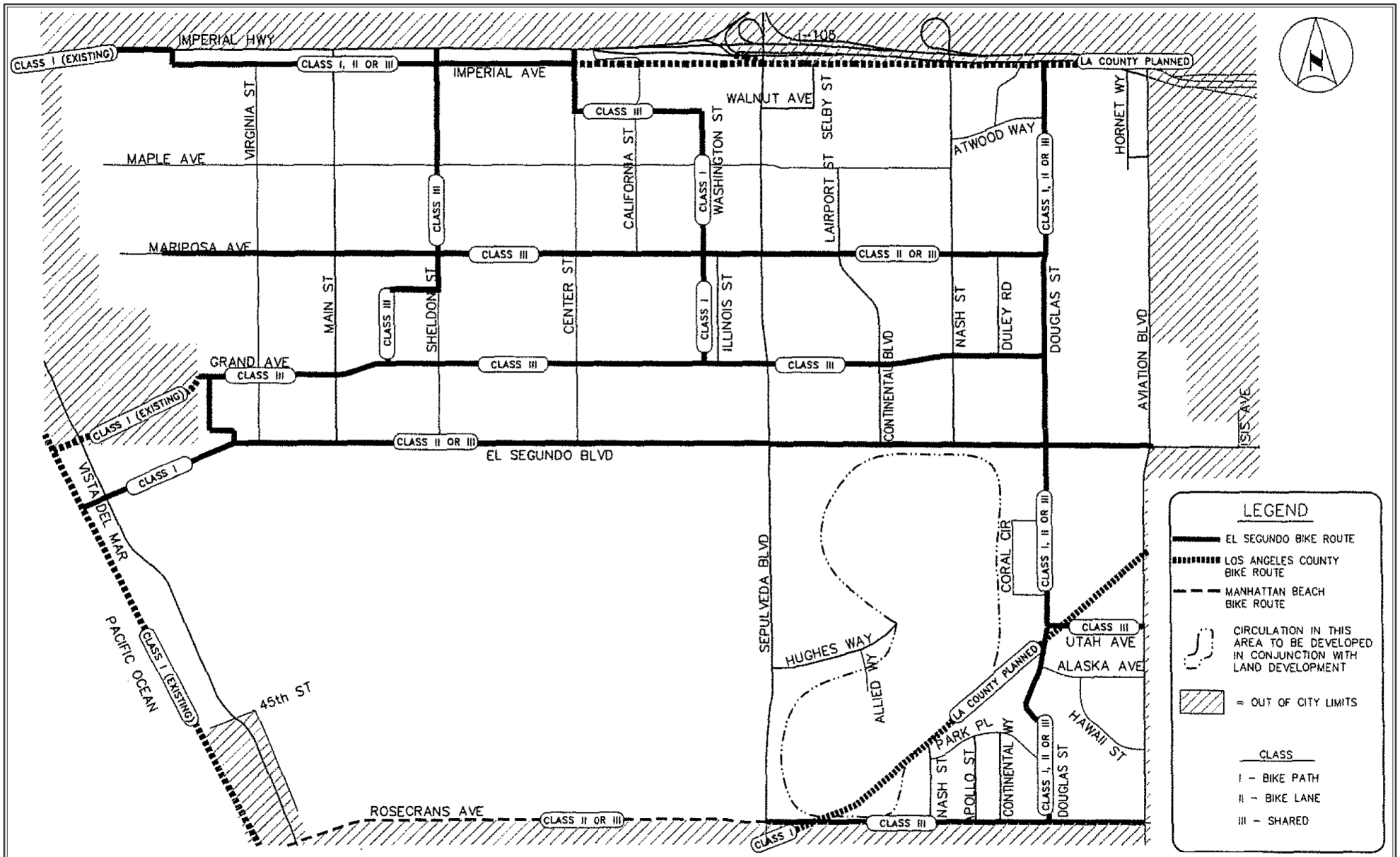
As shown in **Figure IV.L-3, Existing Bicycle Facilities**, Main Street and Grand Avenue currently provide bicycle facilities in the Project area. These roadways are designated as Class III bicycle routes with on-pavement shared lane markings, also known as “sharrows,” along their full extents within the Project area.

Currently, pedestrian facilities are provided throughout the Project area, including sidewalks on all streets, and marked crosswalks at both intersections and at some midblock locations. There are four midblock crosswalks, all located on Main Street, which feature pedestrian-activated in-road flashing lights, crosswalk signs, and yield paddles. These midblock crossings lack crosswalk lines, which reduces their visibility to drivers.

While some intersection pedestrian crossings in the Project area feature ADA-compliant curb ramps with truncated domes, most lack these accessibility enhancements. Additionally, most crosswalks lack edge lines and striping. Both signalized intersections in the Project area do not provide pedestrian countdown on the signal heads.

d) Existing Traffic Volumes

Turning movement counts were conducted at the three Study Area intersections (previously shown on **Figure IV.L-1**) between 7:00 a.m. and 10:00 a.m. and from 4:00 p.m. to 7:00 p.m. on Tuesday, May 24th, 2022. From these six-hour counts, AM and PM peak hour counts were determined for each Study Area intersection. A field visit was also conducted on July 8th, 2022, at which signal operations, lane geometry, and other factors that impact vehicular operations were observed and recorded. Traffic count worksheets for the Study Area intersections are contained within Appendix A of the LTA Report (**Appendix I.2**).



Source: City of El Segundo, 2004

Figure IV.L-3
Existing Bicycle Facilities

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

b) State

(1) Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

(2) Assembly Bill 32 and Senate Bill 375

With the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing Statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

(3) California Vehicle Code

The California Vehicle Code (CVC) provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

(4) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the *State CEQA Guidelines* by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743,

these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the Revised Proposal on Updates to the *State CEQA Guidelines* on Evaluating Transportation Impacts in CEQA, which was an update to Updating Transportation Impacts Analysis in the *State CEQA Guidelines*, Preliminary Discussion Draft of Updates to the *State CEQA Guidelines* Implementing Senate Bill 743, which was released on August 6, 2014. Of particular relevance was the updated text of the proposed new *State CEQA Guidelines* Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, *State CEQA Guidelines* Section 15064.3, which is discussed further below, establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the *State CEQA Guidelines* and the updated guidelines became effective on December 28, 2018.

(5) State CEQA Guidelines Section 15064.3

As discussed above, recent changes to the *State CEQA Guidelines* CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. *State CEQA Guidelines* Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop[1] or a stop along an existing high quality transit corridor[2] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence.

c) Regional and Local

(1) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

Southern California Association of Governments (SCAG) is the designated MPO for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste

[1] *"Major transit stop" is defined in Public Resources Code Section (PRC) 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.*

[2] *"High-quality transit corridors" are defined in (PRC)Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.*

management, and air quality. The City of El Segundo is one of the many jurisdictions that fall under SCAG.

The 2016–2040 RTP/SCS was adopted in April 2016, and presents the land use and transportation vision for the region through the year 2040, providing a long-term investment framework for addressing the region's challenges. The RTP/SCS includes goals to increase mobility and enhance sustainability for the region's residents and visitors. The RTP/SCS encompasses three principles to improve the region's future: mobility, economy, and sustainability. The RTP/SCS provides a regional investment framework to address the region's transportation and related challenges, while enhancing the existing transportation system and integrating land use into transportation planning.

The RTP/SCS recommends local jurisdictions accommodate future growth within existing urbanized areas, particularly near existing transit, to reduce VMT, congestion, and greenhouse gas emissions. The RTP/SCS approach to sustainably manage growth and transportation demand would reduce the distance and barriers between new housing, jobs, and services and would reduce vehicle travel and greenhouse gas emissions. Overall, the strategies and policies in the RTP/SCS are projected to exceed the greenhouse gas emission-reduction targets set forth by the California Air Resources Board under SB 375.[3]

In May 2020 the Regional Council adopted Connect SoCal for the limited purpose of submitting the plan to the Federal Highway Administration and Federal Transit Administration for review prior to the June 1, 2020, deadline, as required by the Clean Air Act. On September 3, 2020, the SCAG Regional Council unanimously voted to approve Resolution No. 20-624-1 to: (1) adopt the 2020–2045 RTP/SCS (Connect SoCal or Plan) PEIR Addendum and Revised Mitigation Monitoring and Reporting Program; (2) approve Connect SoCal in its entirety; and (3) submit Connect SoCal to the California Air Resources Board for confirmation that the Plan meets greenhouse gas reduction targets. The Connect SoCal Plan presents the land use and transportation vision for the region through the year 2045, providing a long-term investment framework for addressing the region's challenges. The following are the 2020 RTP/SCS goals: (1) encourage regional economic prosperity and global competitiveness; (2) improve mobility, accessibility, reliability, and travel safety for people and goods; (3) enhance the preservation, security, and resilience of the regional transportation system; (4) increase person and goods movement and travel choices within the transportation system; (5) reduce greenhouse gas emissions and improve air quality; (6) support healthy and equitable communities; (7) adapt to a changing climate and support an integrated regional development pattern and transportation network; (8) leverage new transportation technologies and data-driven solutions that result in more efficient travel; (9) encourage development of diverse housing types in areas that are supported by multiple transportation options; (10) promote conservation of natural and agricultural lands and restoration of habitats.[4]

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[3] *Southern California Association of Governments, 2016-2040 RTP/SCS, website: https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557. Accessed March 2023.*

[4] *Southern California Association of Governments, 2020-2045 RTP/SCS, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed March 2023.*

(2) City of El Segundo General Plan

The City of El Segundo adopted its General Plan on December 1, 1992. The Circulation Element of the General Plan was adopted in 2004. The goals, objectives, and policies in the circulation element were developed through consideration to existing circulation issues, projected circulation needs associated with the Land Use Element, growth outside of the City, and the interests of the residents and businesses of El Segundo. The goals, objectives, and policies from the Circulation Element that are relevant to the Project include the following:[5]

Goal C1: **Provision for a Safe, Convenient and Cost Effective Circulation System.** Provide a safe, convenient, and cost-effective circulation system to serve the present and future circulation needs of the El Segundo community.

Objective C1-1: Provide a roadway system that accommodates the City's existing and projected land use and circulation needs.

Policy C1-1.7: Provide adequate intersection capacity to the extent feasible on Major, Secondary, and Collector Arterials to maintain LOS D and to prevent diversion of through traffic into local residential streets.

Policy C1-1.8: Provide all residential, commercial, and industrial areas with efficient and safe access to the major regional transportation facilities.

Objective C1-2: Provide a circulation system consistent with current and future engineering standards to ensure the safety of the residents, workers and visitors of El Segundo.

Policy C1-2.1: Develop and maintain a circulation system which shall include a functional hierarchy and classification system of arterial highways that will correlate capacity and service function to specific road design and land use requirements.

Goal C2: **Provision for Alternative Modes of Transportation**. Provide a circulation system that incorporates alternatives to the single-occupant vehicle, to create a balance among travel modes based on travel needs, costs, social values, user acceptance, and air quality considerations.

[5] *City of El Segundo, City of El Segundo General Plan, Chapter 4, Circulation Element, adopted September 2004, https://www.elsegundo.org/home/showpublisheddocument/1958/637237747168070000, accessed March 2023.*

Objective C2-1: Provide a pedestrian circulation system to support and encourage walking as a safe and convenient travel mode within the City's circulation system.

Policy C2-1.6: Encourage shopping areas to design their facilities for ease of pedestrian access.

Policy C2-1.7: Closely monitor design practices to ensure a clear pedestrian walking area by minimizing obstructions, especially in the vicinity of intersections.

Objective C2-2: Provide a bikeway system throughout the City to support and encourage the use of the bicycle as a safe and convenient travel mode within the City's circulation system.

Policy C2-2.1: Implement the recommendations on the Bicycle Master Plan contained in the Circulation Element, as the availability arises; i.e., through development, private grants, signing of shared routes.

Policy C2-2.2: Encourage new development to provide facilities for bicyclists to park and store their bicycles and provide shower and clothes changing facilities at or close to the bicyclist's work destination.

Objective C2-3: Provide a bikeway system throughout the City to support and encourage the use of the bicycle as a safe and convenient travel mode within the City's circulation system.

Policy C2-3.1: Work closely with the Southern California Rapid Transit District (SCRTD), the Los Angeles County Transportation Commission (LACTC), and the Rail Construction Corporation (RCC). Torrance Municipal Bus Lines, the El Segundo Employers Association (ESEA) and private businesses to expand and improve the public transit service within the adjacent to the City.

Policy C2-3.2: Ensure that transit planning is considered and integrated into all related elements of City planning.

Objective C2-5: Ensure the use of Transportation Demand Management (TDM) measures throughout the City, where appropriate, to discourage the single-occupant vehicle, particularly during the peak hours. In addition, ensure that any developments that are approved based on TDM plans incorporate monitoring and enforcement of TDM targets as part of those plans.

Policy C2-5.1: Ensure that Transportation Demand Management (TDM) measures are considered during the evaluation of new developments within the City, including but not limited to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.

Goal C3: **Development of Circulation Policies that are Consistent with other City Policies**. Develop a balanced General Plan, coordinating the Circulation Element with all other Elements, ensuring that the City's decision-making and planning activities are consistent among all City departments.

Objective C3·1: Ensure that potential circulation system impacts are considered when the City's decision makers and staff are evaluating land use changes. **Policy C3-1.1:** Require all new development to mitigate project-related impacts on the existing and future circulation system such that all Master Plan roadways are upgraded and maintained at acceptable levels of service through implementation of all applicable Circulation Element policies. Mitigation measures shall be provided by or paid for by the project developer.

Policy C3-1.5: Ensure that transit planning is considered and integrated into all related elements of City planning.

Policy C3-1.7: Require submittal and implementation of a Transportation Management Plan (TMP) for all projects within the Urban Mixed-Use area, and encourage a TMP for all projects within the northeast quadrant.

Policy C3-1.8: Require the provision of adequate pedestrian and bicycle access for new development projects through the development review process.

Objective C3-2: Ensure the consideration of the impacts of land use decisions on the City's parking situation.

Policy C3-2.1: Ensure the provision of sufficient on-site parking in all new development.

Policy C3-2.2: Ensure that the City's parking codes and zoning ordinances are kept up-to-date.

Objective C4-3: Establish the City's short-term (5-year) Capital Improvement Program (CIP) consistent with the Circulation Element and the

entire General Plan, and ensure that the CIP incorporates adequate funding for the City's circulation needs.

Policy C4-3.1: Identify and evaluate potential revenue sources for financing circulation system development and improvement projects.

(3) City of El Segundo Climate Action Plan

In cooperation with the South Bay Cities Council of Governments, the City of El Segundo adopted its Climate Action Plan (CAP) in 2017. The purpose of the CAP is to assist the City in enhancing the community and neighborhoods to help ensure a safe, healthy, and sustainable environment, promote and encourage the adoption and growth of zero emission vehicles, advance strategies for housing and buildings that reduce energy and water usage, promote behavior change that reduces waste, transform built environments into green spaces, and advance strategies to encourage and support the market for renewable energy and storage. The CAP includes a reduction target of a 15 percent decrease from 2005 levels by 2020 as recommended in the State Assembly Bill 32 Scoping Plan and a 49 percent decrease from 2005 levels by 2035.[6] The proposed Project is compared to the goals and measures of the CAP to determine consistency with the CAP.

(4) Proposed Specific Plan

The Specific Plan Update provides direction for development through regulatory tools and guidelines established to shape the design character envisioned by the community. Based on community input, planning principles shape the guidelines and standards contained in the Specific Plan Update. Planning principles that are implemented through land use and development standards for each district are set forth in the Specific Plan Update. Planning principles that are relevant to transportation are listed below:

Private Realm – Land Use and Development Standards

- **Heart of El Segundo** – Embrace the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown and enhance its identity to reflect local interests.

Public Realm – Multimodal Mobility

- **Expanded Mobility** – Support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.

- **Pedestrians and Bicycles** – Improve walkability and the pedestrian environment and encourage bicycle use with additional bicycle improvements and amenities.

[6] *City of El Segundo, Climate Action Plan, December 2017, available at: https://www.elsegundo.org/government/departments/community-development/planning-division/climate-action-plan. Accessed August 2023.*

- **Improved Public Parking** – Develop a comprehensive parking plan with increased parking wayfinding signage and facilitate innovative methods for parking such as shared parking agreements.

The Land Use and Development Standards chapter of the Specific Plan Update includes site planning and design intended to ensure a pedestrian oriented traditional downtown environment. Specific site and building development standards for each District can be found in **Section II, Project Description**. In addition, the Multimodal Mobility chapter of the Specific Plan Update includes improvement opportunities related to the pedestrian network, bicycle circulation, public transit, vehicular circulation, and parking. These improvement opportunities support the Specific Plan Update objectives related to the improvement of walkability and the pedestrian environment, encouragement of bicycle use, support of enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit, and the development of a comprehensive parking plan.

Pedestrian Network

Opportunities for the improvement of the pedestrian network focus on improving access and comfortability on both sidewalks and at roadway crossings. In order to provide a more comfortable pedestrian experience in Downtown El Segundo, the Specific Plan Update includes numerous improvements consisting of: (1) general sidewalk improvements, including visibility and ADA-compliant upgrades; (2) walkability enhancements at mid-block crosswalks, including visibility improvements and pedestrian signals; (3) walkability enhancements at controlled intersections, including ADA-compliant upgrades and pedestrian countdown heads; and (4) paseo enhancements, including a wayfinding program and pedestrian amenities.

Bicycle Circulation

Opportunities for the improvement of the bicycle network focus on comfort, connection to existing Citywide bicycle facilities, and convenience. The Specific Plan Update envisions the enhancement of east-west Class III bicycle route along Grand Avenue through Downtown to connect existing Class II bike lanes west of Downtown, and envisions improved bicycle comfort along the existing Class III bicycle route, or its upgrade to a Class II bicycle lane, along Main Street. A bicycle hub, consisting of a gated area with controlled access and potentially a repair station, as well as enhanced bicycle wayfinding signage at gateway points and the intersections of the two existing bike routes at Main Street and Grand Avenue, are also recommended.

Public Transit

Opportunities for the improvement of public transit focus on efficiency of transit service and comfort of transit stop amenities. The Specific Plan Update includes the following improvements to transit service to enhance mobility to, from, and within Downtown:

1. Coordinate with Beach Cities Transit on their ongoing short-range transportation plan development to ensure that Line 109 continues to serve Downtown El Segundo and identify opportunities to increase service frequency or hours of service.
2. Continue operating the Beach Shuttle each summer through public-private partnerships.

3. Continue operating DAR through public-private partnerships with expanded service hours, including evenings and weekends.
4. Investigate public-private partnership opportunities to resume operation of the Lunch Time Shuttle or similar service. Upon resumption, expand service hours to include evenings to enhance dinnertime connections between Downtown El Segundo and the Smoky Hollow area.
5. Continue communication between City Hall, Beach Cities Transit, and the El Segundo Police Department to enhance public outreach regarding temporary closures of Main Street and subsequent transit service detours.

The Specific Plan Update includes the following enhancements to improve transit mobility and rider comfort in Downtown:

1. Provide transit shelters at Downtown bus stops, where space allows. Transit shelters could be designed to reflect City or Downtown community aesthetic desires.
2. At a minimum, include a bench and waste bin at each bus stop.
3. Increase bus zone length by extending red curb at stops, to at least thirty-five (35) feet where feasible.

Vehicular Circulation

Opportunities for the improvement of vehicular circulation focus on multi-modal operations at intersections and placemaking considerations along roadway segments. The Specific Plan Update proposes re-configuration opportunities on Main Street, Grand Avenue, and Richmond Street to improve pedestrian mobility throughout Downtown. The Specific Plan Update includes preferred and alternative roadway configurations for each of these roadways, as presented below.

Main Street: The Preferred Roadway Concept for Main Street proposes a reduction in the number of travel lanes on Main Street from two lanes in each direction to one lane in each direction. The proposed Pedestrian Mobility Emphasis concept for the Main Street envisions enhanced pedestrian comfort and outdoor gathering opportunities, with wider sidewalks and outdoor dining, while upgrading the existing Class III bike route “sharrows” into Class II bicycle lanes. This concept maintains the existing parallel parking spaces on both sides of the street and is expected to maintain a similar parking supply along Main Street as exists today. The Bicycle Mobility Emphasis alternative concept for Main Street envisions enhanced cyclist comfort with Class II buffered bike lanes.

Grand Avenue: The preferred Grand Avenue Pedestrian Mobility Emphasis concept envisions enhanced pedestrian comfort and outdoor gathering opportunities, with wider sidewalks and outdoor dining, while maintaining the existing Class III bike route “sharrows.” This concept involves the conversion of parallel parking spaces on both sides of the street and along both sides of the median to angled parking to allow for wider sidewalks and outdoor dining and includes a widened central median. There are two (2) Bicycle Mobility Emphasis alternatives developed for Grand Avenue that provide enhanced cyclist comfort through the creation of dedicated bicycle facilities: Class II bike lanes and Class IV protected bikeway (Cycle-Track). The Class II concept

envisions enhanced cyclist comfort with buffered bike lanes. The Cycle-Track concept includes a two-way Class IV protected bikeway on one (1) side of the street.

Richmond Street: The preferred Richmond Street concept envisions more comfort and expanded outdoor gathering opportunities with wider sidewalks, outdoor dining and the continuation of two travel lanes. This concept would result in the removal of all parking spaces on this portion of the street and assumes a future parking structure would be developed adjacent to Richmond Street. The Pedestrian Mall concept between Franklin Avenue and Grand Avenue envisions enhanced pedestrian comfort and expanded outdoor gathering opportunities with wider sidewalks and the removal of vehicular travel lanes to allow for an expanded permanent outdoor dining area with increased gathering opportunities. The Pedestrian Mall concept would result in the removal of all parking spaces on this portion of the street and assumes a future parking structure would be developed adjacent to Richmond Street. The Pedestrian Mall concept for Richmond Street would permanently restrict vehicular traffic in this portion of the street, except for emergency vehicle access.

The Specific Plan Update includes the following improvements to increase the multi-modal mobility of intersection control in Downtown:

1. Protected left turn phases could be added in all directions at the intersection of Main Street and Grand Avenue to reduce left turn conflicts with oncoming vehicles and pedestrians in the adjacent crosswalk.
2. All side-street stop-control intersections should include stop signs and stop bars on the controlled approaches to reduce right-of-way confusion.

The Specific Plan Update includes the following recommendations with regard to street closure placemaking:

- Main Street has in-road bollards that allow for temporary street closures for special events, such as the Farmer's Market. To continue serving Specific Plan Update objectives, including promoting a "village" character and a pedestrian friendly environment, this flexibility for temporary street closures should be maintained. Decorative paving is suggested in the travel lanes in this portion of Main Street to signify this special place. To enhance mobility throughout Downtown during closure events on Main Street, coordination and public outreach should be implemented.
- The temporary closure of the half-block of Richmond Street between Grand Avenue and Franklin Avenue should be expanded upon to provide ongoing placemaking opportunities and community gathering benefits to the Downtown, with one of the following options: (1) Permanently close the Pedestrian Mall segment using a combination of in-road bollards, similar to those on Main Street, and landscaping on both ends. The pavement could be resurfaced with pedestrian-scale material such as decorative concrete, pavers, or brick; or (2) Install in-road bollards or removable bollards at both ends of the Pedestrian Mall segment to allow ongoing temporary closures, while maintaining vehicle access during non-event periods. In-road bollard receptacles could also be implemented to allow for temporary road closures for events for the existing road section of Richmond Street (shown in Figure 3.13), or in conjunction with the Preferred Sidewalk Dining concept.

The Specific Plan Update includes the following enhancements for alleyways to recapture underutilized public space for outdoor activity and provide more engaging and welcoming public spaces with enhanced connectivity throughout Downtown:

All alleyway enhancements should include:

1. Public art such as murals, paving insets, and sculpture
2. Street trees and landscape enhancements such as potted plants
3. Entry elements such as decorative paving and/or accent landscaping
4. Trash and recycling receptacle consolidation and concealment
5. Lighting and facade enhancements

Neighborhood alley enhancements are proposed in the following locations:

- Alleyway between Main Street and Standard Street (between Holly Avenue to Mariposa Avenue)
- Alleyway between Concord Street and Richmond Street (between El Segundo Boulevard to Holly Avenue)

In addition to the requirements for all alleyways, neighborhood alleys should include:

1. Clearly defined pedestrian paths of travel with decorative paving
2. Shaded pedestrian seating and comfortable gathering areas
3. Key alleyway entrances should be highlighted with an overhead element, such as an archway, arbor, or trellis
4. Hanging and twinkle lights are encouraged but may not be placed adjacent to residential uses
5. Wayfinding and directional signage

Service alleys are proposed in the following locations:

- Alleyway between Main Street and Standard Street (between Holly Avenue to Mariposa Avenue)
- Alleyway between Concord Street and Richmond Street (between El Segundo Boulevard to Holly Avenue)

In addition to the requirements for all alleyways, service alleys should include:

1. Maintain a clear path for delivery and service vehicles with defined pedestrian paths of travel using elements such as decorative paving
2. Back patio and seating areas with bike racks and lockers
3. Directional signage and signage for key elements and historic landmarks

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to transportation are based on Appendix G of the *State CEQA Guidelines*. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to transportation would occur if a project would:

Threshold (a): ***Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;***

Threshold (b): ***Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);***

Threshold (c): ***Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and***

Threshold (d): ***Result in inadequate emergency access.***

(1) Methodology

The transportation analysis contained in this section focuses on operation of the Project; that being, a year 2040 condition in which the Project area is built-out to reflect the land use quantities enabled by the Project, the preferred conceptual roadway cross sections, and the recommended general transportation network enhancements. The analysis of the construction phases of future development, roadway design, and infrastructure enhancements would be assessed during the review in the future with each individual development project enabled by this plan or roadway improvement implementation, when the actual construction methods and approaches are known. Due to the programmatic nature of the Project, a detailed construction analysis is not included.

CEQA Guidelines section 15064.3, subdivision (b)

The City of El Segundo *SB 743 Implementation Guidelines*[7] define two metrics for determining thresholds of significance – efficiency and net change, both of which are defined and described below in **Table IV.L-1, Significance Threshold Criteria and Methodology**.

[7] *City of El Segundo, SB 743 Implementation Guidelines, May 2022, adopted September 2022.*

Table IV.L-1
Significance Threshold Criteria and Methodology

Threshold Basis	Efficiency [1]	Net Change [2]
Example Land Use	Residential, Professional Office	Retail, Hotel, Sports Venue, Industrial
Example VMT Thresholds	VMT per service population [3]	Region VMT change
Customer Component	No	Yes
Allowable Methods	Non-Significant Screening Criteria; The City of El Segundo Sketch Planning Tool; Travel Demand Model	Non-Significant Screening Criteria; Travel Demand Model

1 Efficiency metrics include VMT/Capita, Work VMT/employee, and VMT/Service Population.
2 Net Change refers to the net change in regional VMT and is used for elements that include a significant customer base, such as commercial uses, although it can extend to a variety of uses that have similar characteristics.
3 Service population is defined as the sum of population (capita) and employees of a given geography.
Sources: City of El Segundo, SB 743 Implementation Guidelines, May 2022, adopted September 2022.

The *SB 743 Guidelines* further state that "for non-typical land use projects, the project applicant will need to work with the City to determine which metric and methodology should be used for analyzing the project' s VMT impact." As the Project includes a considerable increase in various land use quantities, which would represent most of the employment in the Project transportation analysis zone (TAZ) in 2040, utilization of a travel demand model (SCAG RTP/SCS Activity-Based Model [ABM]) was determined to be the most appropriate methodology. Preparation of the ABM for the analysis in the TA Report involved coordination with City staff, including the confirmation of existing land use data within the Project area and employment growth within the Smoky Hollow Specific Plan Area, a related project.

The ABM simulates daily activities and travel patterns of all individuals in the region, as affected by transportation system conditions.[8] All vehicle-trips are traced to the zone or zones of study. This includes internal to internal, internal to external, and external to internal trips. These modeled trips are used to calculate VMT for the TAZ's of interest within the model.

The City's impact criteria are specified in the *SB 742 Guidelines*. The threshold of significance evaluation method is defined by land use, as noted in **Table IV.L-2, VMT Threshold of Significance Evaluation Method**.

Table IV.L-2
VMT Thresholds of Significance Evaluation Method

Land Use	Threshold of Significance Evaluation Method
Residential	The existing daily VMT per service population for the City of El Segundo based on data from Replica [1]
Office	The existing daily VMT per service population for the City of El Segundo based on data from Replica [1]
Retail	Net increase in total daily VMT

1 Replica is a data source utilized for the SB 743 Guidelines development.
Sources: City of El Segundo, SB 743 Implementation Guidelines, May 2022, adopted September 2022.

[8] *Southern California Association of Governments, 2016 Regional Travel Demand Model Validation, 2020.*

Utilizing the threshold of significance evaluation method described in **Table IV.L-2, VMT Threshold of Significance Evaluation Method,** above, the thresholds of significance defined by *SB 743 Guidelines* are presented in **Table IV.L-3, Thresholds of Significance – SB 743 Guidelines**.

Table IV.L-3
Threshold of Significance – SB 743 Guidelines

Land Use	VMT Threshold [1]	Basis and Data Source
Residential	24.5 VMT/Service Population	The existing VMT per service population for the City of El Segundo based on data from Replica
Office	24.5 VMT/Service Population	The existing VMT per service population for the City of El Segundo based on data from Replica
Retail	Net regional change	Using the City of El Segundo as the basis and Replica as the data source
Other Employment	24.5 VMT/Service Population	The existing daily VMT per service population for the City of El Segundo based on data from Replica
Other Customer	Net regional change	Using the City of El Segundo as the basis and Replica as the data source

1 The threshold used for this analysis was modified to maintain consistency with the "2040 with Project" scenario using travel demand modeling. The values in this table are provided for informational purposes regarding the City's Replica-based threshold.
Sources: City of El Segundo, SB 743 Implementation Guidelines, May 2022, adopted September 2022.

The VMT per service population (VMT/SP) baselines described in **Table IV.L-3, Thresholds of Significance – SB 743 Guidelines,** are based on Replica data from 2019, as described in the City's SB 743 Implementation Guidelines.[9] As described in the SB 743 Guidelines, "Replica uses anonymized cell phone data combined with other sources of location-based data such as credit card transactions to estimate trips." As previously discussed, the most appropriate evaluation for the Project was determined to be a travel demand model, which differs from Replica data. For consistency in methodology between the Project and baseline VMT/SP establishment, the ABM was utilized to produce an "existing without Project" scenario, replacing the nominal 24.5 Citywide VMT/SP defined from Replica, which would not be a "like for like" comparison to the travel demand model results.

The "existing without Project" (2023) scenario was developed using land use data obtained from the City, allowing a more precise depiction of land use within the Project area and surrounding areas compared to that produced in SCAG regional population projections, which is typically used to inform ABM inputs if more granular data are not available. The existing land use data can be found in Appendix D of the TA Report (see **Appendix I.1**). The existing land use data were converted to population and employment by industry sector using factors defined in the City of Los Angeles VMT Calculator Documentation.[10] The City of LA VMT Calculator Documentation includes nationally and regionally-researched land use and transportation data sources for conversion rate development specific to southern California. The specific source of each conversion rate is cited in that document. The resulting socioeconomic data that was input into

[9] *City of El Segundo, SB 743 Implementation Guidelines, May 2022, adopted September 2022.*
[10] *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

the ABM for the existing without Project scenario is included in Appendix C of the TA Report (see **Appendix I.1**).

As a regional and long-term transportation forecasting tool with millions of people and transportation network data inputs, an ABM network does not exist for each and every possible scenario year. Such is the case for the year 2023; thus, the ABM 2016 scenario was utilized to produce an initial VMT metric for baseline establishment. To produce a metric for the year 2023, linear interpolation was utilized based on the trend line between model years 2016 and 2045, using ABM outputs obtained directly from SCAG.

Based on this methodology, the VMT/SP in 2023 for the City of El Segundo was 26.2 VMT/SP. Service population is defined as the sum of population (capita) and employees of a given geography. This metric of 26.2 VMT/SP was utilized as the residential and office land use VMT impact threshold for the Project's TAZ. If the "2040 with Project" VMT/SP is higher than the established City baseline, then there is a significant transportation impact. If it is lower, there is not a significant impact based on this metric.

A similar interpolation methodology was utilized to determine the Citywide total daily VMT baseline, which defines the threshold metric for retail projects. If the Project results in a net increase in total daily Citywide VMT, then there is a significant impact based on the retail VMT metric. If the Project does not result in a net increase in total daily Citywide VMT, there is not a significant impact based on that metric. Consistent with the SB 743 Guidelines, neither baseline nor "2040 with Project" VMT metrics include truck trips. Given that the Project enables buildout of multiple land uses within a defined geography, including residential, office, and retail, the Project was evaluated for transportation impact based on both VMT/SP of the TAZ and based on a net increase in total daily Citywide VMT.

b) Analysis of Project Impacts

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

The purpose of this CEQA Checklist Question is to determine whether the Project conflicts with a transportation-related plan, program, ordinance, or policy that was adopted to protect the environment. A project would not be shown to result in an impact merely based on whether a project would not implement an adopted plan, program, ordinance, or policy. Rather, it is the intention of this threshold test to ensure that proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies. Furthermore, under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation were adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

Programs, plans, ordinances, and policies applicable to this analysis include the SCAG RTP/SCS, the City of El Segundo General Plan Circulation Element, and the South Bay Bicycle Master Plan (BMP). Consistency with each is presented below.

(1) SCAG RTP/SCS

The SCS is a required element of the RTP that provides a plan for meeting GHG emissions reduction targets set forth by the CARB. It provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the South Coast Air Quality Management District. The California Air Resources Board (CARB) has determined SCAG's reduction target for per capita vehicular emissions to be 8 percent by 2020 and 19 percent by 2035 relative to the 2005 baseline. Successfully meeting these targets will require substantial effort to reduce VMT. The 2020–2045 RTP/SCS calls for investing $638 billion over the 25-year term of the plan toward over 4,000 transportation projects, all of which collectively are expected to result in a 5 percent reduction in daily VMT per capita and a more than 25 percent decrease in traffic delay per capita. Investments will focus on maintaining and better managing the existing transportation network, expanding mobility choices, and increasing investment in transit and complete streets.

Of the ten goals presented in the 2020–2045 RTP/SCS, the following five are applicable to transportation:

- Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.
- Goal 4: Increase person and goods movement and travel choices within the transportation system.
- Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.
- Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.

As a land use plan that enables infill development, densification of land uses, and multimodal mobility improvements, the Project would be consistent with the RTP/SCS and would not preclude any of Goals 2, 3, 4, 7, or 8 from being realized.

(2) City of El Segundo General Plan Circulation Element

The Circulation Element of the City's General Plan is intended to guide the City's provision of a safe, convenient, and efficient circulation system. The Circulation Element includes a Master Plan of Streets and an Alternative Modes of Travel section, and defines goals, objectives, and policies related to transportation. The Project's consistency with the Circulation Element policies related to transportation is presented in **Table IV.L-4, Project Consistency with the Circulation Element**, below. As shown in **Table IV.L-4**, the Project would be consistent with the reviewed policies of the Circulation Element.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C1-1.1: Maintain and update the citywide traffic model as needed for purposes of evaluating project-related and external traffic impacts on the City circulation system.	**No Conflict**. The proposed Project would not preclude the City's ability to maintain and update the citywide traffic model as the proposed Project does not propose changes to the City's traffic modeling practices.
Policy C1-1.2: Pursue implementation of all Circulation Element policies such that all Master Plan roadways are upgraded and maintained at acceptable levels of service.	**No Conflict**. As a result of SB 743, intersection delay (LOS) is no longer a criterion used to assess transportation impacts under CEQA.
Policy C1-1.3: Provide adequate roadway capacity on all Master Plan roadways.	**No Conflict**. The proposed Project would provide alternatives to vehicle travel on Main Street that would limit the growth in traffic on Main Street and would not alter roadway capacity on other Master Plan Roadways. As a result, the proposed Project would not preclude the City's ability to provide adequate roadway capacity on all Master Plan roadways.
Policy C1-1.4: Construct missing roadway links to complete the roadway system designated in the Circulation Element when needed to improve traffic operating conditions and to serve development.	**No Conflict**. The proposed Project would not preclude the City's ability to construct missing roadway links to complete the roadway system designated in the Circulation Element.
Policy C1-1.5: Implement roadway and intersection upgrades to full Circulation Element standards when needed to improve traffic operating conditions and to serve development.	**No Conflict**. The proposed Project would not preclude the City's ability to implement roadway and intersection upgrades to full Circulation Element standards.
Policy C1-1.6: Ensure that planned intersection improvements are constructed as designated in Exhibit C-9 to achieve efficient operation of the circulation system at a Level of Service "D" or better where feasible.	**No Conflict**. As a result of SB 743, intersection delay (LOS) is no longer a criterion used to assess transportation impacts under CEQA.
Policy C1-1.7: Provide adequate intersection capacity to the extent feasible on Major, Secondary, and Collector Arterials to maintain LOS D and to prevent diversion of through traffic into local residential streets.	**No Conflict**. As a result of SB 743, intersection delay (LOS) is no longer a criterion used to assess transportation impacts under CEQA.
Policy C1-1.8: Provide all residential, commercial, and industrial areas with efficient and safe access to the major regional transportation facilities.	**No Conflict**. The proposed Project would not preclude the City's ability to provide all residential, commercial, and industrial areas with efficient and safe access to major transportation facilities.
Policy C1-1.9: Provide all residential, commercial, and industrial areas with efficient and safe access for emergency vehicles.	**No Conflict**. The proposed Project would not preclude the City's ability to provide all residential, commercial, and industrial areas with efficient and safe access for emergency vehicles.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C1-1.10: Ensure that new roadway links are constructed as designated in the Master Plan and link with existing roadways within the City such that efficient operation of the circulation system is maintained at an operating Level of Service of "D" or better.	**No Conflict**. As a result of SB 743, intersection delay (LOS) is no longer a criterion used to assess transportation impacts under CEQA. Additionally, proposed Project would not preclude the City's ability to maintain efficient operation of the circulation system on new road links.
Policy C1-1.11: Ensure that the transition from any Master Plan roadway to another Master Plan roadway at a higher classification operates safely and efficiently, incorporating the appropriate intersection configuration and any turn lanes that are necessary.	**No Conflict**. Preferred roadway modifications would be designed according to CAMUTD standards related to safely and the proposed Project would not preclude the City's ability to ensure that transitions from any Master Plan roadway to another Master Plan roadway at a higher classification operates safely and efficiently, incorporating the appropriate intersection configuration and any turn lanes that are necessary.
Policy C1-1.12: Convert Nash Street and Douglas Street from a one-way couplet to a two-way roadway operation between El Segundo Boulevard and Imperial Highway, incorporating appropriate signage, traffic controls, and other modifications to ensure motorist and pedestrian safety and efficient traffic operations.	**No Conflict**. The proposed Project does not propose changes to Nash Street and Douglas Street and would not preclude the City's from converting Nash Street and Douglas Street from a one-way couplet to a two-way roadway between El Segundo Boulevard and Imperial Highway.
Policy C1-1.13: Establish and maintain a citywide traffic count program, to ensure the availability of data needed to identify circulation problems and to evaluate potential improvements.	**No Conflict**. The proposed Project would not preclude the City's ability to maintain a citywide traffic count program as count collection would not be prohibited by the land use buildout or preferred roadway enhancements.
Policy C1-1.14: Require a full evaluation of potential traffic impacts associated with proposed new developments prior to project approval. Further, require the implementation of appropriate mitigation measures prior to, or in conjunction with, project development. Mitigation measures may include new roadway links on segments that would connect the new development to the existing roadway system, intersection improvements, and other measures. Mitigation measures shall be provided by or paid for by the project developer.	**No Conflict**. The proposed Project would not preclude the City's ability to conduct a full evaluation of potential traffic impacts associated with proposed new developments prior to project approval nor would it conflict with the City's requirement for developer to implement appropriate mitigation measures.
Policy C1-1.15: Pursue and protect adequate right-of-way to accommodate future circulation system improvements.	**No Conflict**. The proposed Project would not preclude the City's ability to pursue and protect adequate right-of-way to accommodate future circulation system improvements as the project does not propose changes to the City's right of way acquisition policy.
Policy C1-1.16: Encourage the widening of substandard streets and alleys to meet City standards wherever feasible.	**No Conflict**. The proposed Project is not located on a substandard street or alley and would not preclude the City's ability to encourage the widening of substandard streets and alleys to meet City standards.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C1-1.17: Encourage cooperation with other governmental agencies to provide adequate vehicular traffic movements on streets and through intersections by means of synchronized signalization.	**No Conflict**. The proposed Project would not preclude the City's ability to coordinate with other governmental agencies to provide adequate vehicular traffic movements on streets and through intersections by means of synchronized signalization as the proposed Project does not propose changes to interagency practices.
Policy C1-1.18: Review future developments to ensure uniformity of street naming and avoidance of name duplication or name inconsistencies on a continuous link.	**No Conflict**. The proposed Project would not preclude the City's ability to review future developments to ensure uniformity of street naming and avoidance of name duplication or name inconsistencies on a continuous link as the proposed Project does not propose changes to street naming conventions.
Policy C1-1.19: Continue to monitor the impacts of the I-105 Freeway on local El Segundo streets. If it is determined that freeway traffic is using local streets like California Street as a short cut through the City, evaluate potential mitigations.	**No Conflict**. The proposed Project would not preclude the City's ability to monitor the impact of the I-105 Freeway on local El Segundo Streets as monitoring freeway traffic patterns would not be prohibited by the land use or preferred roadway enhancements.
Policy C1-2.1: Develop and maintain a circulation system which shall include a functional hierarchy and classification system of arterial highways that will correlate capacity and service function to specific road design and land use requirements.	**No Conflict**. The proposed Project would not change the existing hierarchy and classification system of arterial highways and would not preclude the City's ability to maintain a circulation system that includes a functional hierarchy and classification system of arterial highways that correlates capacity and service function to specific road design and land use requirements.
Policy C1-3.1: Ensure that the City's designated truck routes provide efficient access to and from the I-105 Freeway.	**No Conflict**. The proposed Project would not alter the roadway configuration of existing truck routes or the existing truck route network and would not preclude the City's ability to ensure that the City's designated truck routes provide efficient access to and from the I-105 Freeway.
Policy C1-3.2: Ensure that the development review process incorporates consideration of off-street commercial loading requirements for all new projects.	**No Conflict**. The proposed Project would not preclude the City's ability to ensure the development review process incorporates consideration of off-street commercial loading requirements for all new projects as proposed Project does not propose changes to the development review process.
Policy C1-3.3: Require that all new construction on streets or corridors that are designated truck routes have a Traffic Index calculation as stated by the State Department of Transportation in order to provide a roadway structural section that will accommodate the projected truck volumes and weights.	**No Conflict**. The proposed Project would not preclude the City's ability to require that all new construction on streets or corridors that are designated truck routes have a Traffic Index calculation as stated by the State Department of Transportation as the Project does not propose changes to the freight planning process.
Policy C1-3.4: Prohibit parking within the public right-of-way on either side two-way alleys. Parking on one side of a one-way alley could be allowed if the alley width is a minimum of 19 feet.	**No Conflict**. The proposed Project would not alter any one-way or two-way alleys and would not preclude the City's ability to prohibit truck parking within the public right-of-way on either side of two-way alleys.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C1-3.5: Ensure that the trucks from the cargo facility north of Imperial Highway at Main Street stay on the City truck route system and do not travel along Main Street.	**No Conflict**. The proposed Project would not preclude the City's ability to prohibit trucks from the cargo facility north of Imperial Highway at Main Street from traveling along Main Street as the proposed Project does not propose changes to the enforcement of existing truck routes.
Policy C2-1.1: Encourage the development of pedestrian linkages to and from the Metro Green Line stations to encourage and attract internodal transit/ walking trips.	**No Conflict**. The proposed Project would improve pedestrian facilities on Main Street and Grand Avenue and would not preclude the City's ability to develop pedestrian linkages to and from the Metro Green Line stations as the proposed Project is not adjacent to a Green Line Station and does not propose changes to Green Line station access planning.
Policy C2-1.2: Develop a citywide system of pedestrian walkways, alleviating the conflict between pedestrians, autos, and bicyclists throughout the City.	**No Conflict**. The proposed Project would improve existing pedestrian facilities on Main Street and Grand Avenue to provide more space for pedestrian travel and potentially reduce conflicts between pedestrians, autos, and bicyclists. The proposed Project would not preclude the City's ability to further develop the citywide pedestrian network.
Policy C2-1.3: Encourage new developments in the City to participate in the development of the citywide system of pedestrian walkways and require participation funded by the project developer where appropriate.	**No Conflict**. The proposed Project would not preclude the City's ability to encourage new developments to participate in the development of the citywide system of pedestrian walkways nor would the proposed Project preclude the City's ability to require developer to participate and fund the development of the citywide system of pedestrian walkways as the proposed Project does not suggest changes to the development process.
Policy C2-1.4: Ensure the installation of sidewalks on all future arterial widening or new construction projects, to establish a continuous and convenient link for pedestrians.	**No Conflict**. The proposed Project would install new sidewalks along Main Street and Grand Avenue and would not preclude the City's ability to install sidewalks on all future arterial widening or new construction projects.
Policy C2-1.5: Encourage the continued use of the 1911 Act to provide missing sidewalk sections where applicable in residential and commercial areas.	**No Conflict**. The proposed Project would not preclude the City's ability to use the 1911 Act to provide missing sidewalk sections as it does not alter State regulations.
Policy C2-1.6: Encourage shopping areas to design their facilities for ease of pedestrian access.	**No Conflict**. The proposed Project would improve pedestrian facilities in shopping areas in Downtown El Segundo and would not preclude the City's ability to encourage shopping areas to design their facilities for ease of pedestrian access.
Policy C2-1.7: Closely monitor design practices to ensure a clear pedestrian walking area by minimizing obstructions, especially in the vicinity of intersections.	**No Conflict**. The proposed Project would not preclude the City's ability to closely monitor design practices to ensure a clear pedestrian walking area by minimizing obstructions, especially in the vicinity of intersections.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C2-2.1: Implement the recommendations on the Bicycle Master Plan contained in the Circulation Element, as the availability arises, i.e., through development, private grants, signing of shared routes.	**No Conflict**. The Bicycle Master Plan contained within the Circulation Element includes recommended Class III bicycle routes on Mariposa Avenue and Grand Avenue and Class II or III bicycle facilities on El Segundo Boulevard within the Project area. The Class III facility on Grand Avenue has already been implemented under existing conditions, and the Project proposes maintaining this facility. The Project would not preclude the implementation of the Mariposa Avenue or El Segundo Boulevard facilities.
Policy C2-2.2: Encourage new development to provide facilities for bicyclists to park and store their bicycles and provide shower and clothes changing facilities at or close to the bicyclist's work destination.	**No Conflict**. The proposed Project would not preclude the City's ability to encourage new development to provide facilities for bicyclists to park and store their bicycles and provide shower and clothes changing facilities at or close to the bicyclist's work destination.
Policy C2-2.3: Develop off-street bicycle paths in corridors where appropriate throughout the City.	**No Conflict**. The proposed Project would not preclude the City's ability to develop off-street bicycle paths.
Policy C2-2.4: Encourage the use of bicycles for trips to and from elementary, middle, and high schools in the area as well as parks, libraries, and other public facilities.	**No Conflict**. The proposed Project would encourage bicycle use with additional bicycle improvements and amenities. Specifically, the Project envisions the enhancement of east-west Class III bicycle route along Grand Avenue through Downtown to connect existing Class II bike lanes west of Downtown, and envisions improved bicycle comfort along the existing Class III bicycle route, or its upgrade to a Class II bicycle lane, along Main Street. A bicycle hub, consisting of a gated area with controlled access and potentially a repair station, as well as enhanced bicycle wayfinding signage at gateway points and the intersections of the two existing bike routes at Main Street and Grand Avenue, are also recommended. The proposed Project would not preclude the City's ability to encourage the use of bicycle trips to and from schools, parks, libraries, and other public facilities.
Policy C2-2.5: Continue coordination of bicycle route planning and implementation with adjacent jurisdictions and regional agencies.	**No Conflict**. The proposed Project would not preclude the City's ability to coordinate bicycle route planning and implementation with adjacent jurisdictions and regional agencies as the proposed Project does not propose changes to regional coordination for transportation improvements.
Policy C2-2.6: Encourage design of new streets with the potential for Class I or Class II bicycle routes that separate the automobile, bicycle, and pedestrian to the maximum extent feasible.	**No Conflict**. The proposed Project would not preclude the City's ability to encourage the design of new streets with the potential for Class I or Class II bicycle routes as the proposed Project is not located on a new street and does not propose changes to design standards for new streets.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C2-2.7: Although Hillcrest Street is closed between Imperial Avenue and Imperial Highway to allow emergency vehicular access only, ensure that the link in the Master Plan of Bicycle Routes is maintained, via the Hillcrest Street right-of-way or any appropriate alternative route.	**No Conflict**. The proposed Project would not preclude the City's ability to maintain the Hillcrest Street link in the Master Plan of Bicycle routes as the proposed Project does not propose changes to Hillcrest Street between Imperial Avenue and Imperial Highway, nor does the proposed Project preclude the City from developing an alternative route.
Policy C2·2.8: Evaluate bikeway system links with the Metro Green Line rail stations and improve access wherever feasible.	**No Conflict**. The proposed Project would not preclude the City's ability to evaluate bikeway system links within the Metro Green Line rail stations and improve access to the stations as the proposed Project does not suggest changes to bike access at Metro Green Line rail stations.
Policy C2-3.1: Work closely with the Los Angeles County Metropolitan Transportation Authority (MTA), Torrance Municipal Bus Lines, the El Segundo Employers Association (ESEA), and private businesses to expand and improve the public transit service within and adjacent to the City.	**No Conflict**. The proposed Project would not preclude the City's ability to work with MTA and other transit agencies to expand and improve public transit service within and adjacent to the City as the proposed Project does not propose changes to inter-agency coordination.
Policy C2-3.2: Ensure that transit planning is considered and integrated into all related elements of City planning.	**No Conflict**. The proposed Project would not preclude the City's ability to ensure that transit planning work is considered and integrated into all related elements of City planning. The proposed Project includes recommendations to improve the transit planning process within the Project area, and does not suggest changes to the City's transit planning process outside of the Project area.
Policy C2-3.3: Evaluate and implement feeder bus service through the City where appropriate. Feeder bus service could potentially take commuters from the fixed transit services (rail and bus) in the eastern portion of the City to the industrial and commercial areas to the west. In addition, midday shuttling of workers east of Sepulveda Boulevard to the Downtown retail area should also be maintained.	**No Conflict**. The proposed Project would not preclude the City's ability to evaluate and implement feeder bus service through the City. The proposed Project includes recommendations to improve the transit planning process within the Project area and does not suggest changes to the City's transit planning process outside of the Project area.
Policy C2-3.4: Pursue potential Proposition A and Proposition C funds for bus transit shelters, signing, advertising, and bus turnouts to encourage bus ridership.	**No Conflict**. The proposed Project would not preclude the City's ability to pursue additional Proposition A and Proposition C funds for bus transit shelters, signing, advertising, and bus turnouts as the proposed Project does not propose new uses for Proposition A and Proposition C funds.
Policy C2-3.5: Continue the Dial-a-Ride operation and City subsidy to serve all residents of El Segundo, especially the elderly and handicapped	**No Conflict**. The Project includes a recommendation for continuing operation of Dial-a-Ride service within the Project area.
Policy C2-3.6: Continue to support the Downtown Lunchtime shuttle operation.	**No Conflict**. The proposed Project includes a recommendation for continuing operation of the Lunchtime Shuttle within the Project area.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C2-3.7: Explore the feasibility of using excess government right-of-way, purchased property, or land use arrangements for multiple use of existing facilities, in order to establish or construct park-and-ride services of benefit to El Segundo residents and employees.	**No Conflict**. The proposed Project would not preclude the City's ability to explore using excess government right-of-way, purchased property, or land use arrangements for multiple use of existing facilities, in order to establish or construct park-and-ride services as the proposed Project does not alter the City's park-and-ride policy.
Policy C2-3.8: Encourage the implementation of park-and-ride facilities proximate to the I-405 and I-105 Freeways for shuttle service into El Segundo.	**No Conflict**. The proposed Project would not preclude the City's ability to implement park-and-ride facilities near the I-405 and I-105 Freeways as the proposed Project is not located adjacent to I-405 or I-105.
Policy C2-3.9: Investigate all MTA programs which may be beneficial to the City.	**No Conflict**. The proposed Project would not preclude the City's ability to investigate all MTA programs which may be beneficial to the City as the proposed Project does not suggest changes to the City's cooperation with Metro.
Policy C2-3.10: Encourage the MTA to provide bike storage facilities at the Metro Green Line rail stations.	**No Conflict**. The proposed Project is not located adjacent to any Metro Green Line rail stations. The Project would not preclude the City's ability to encourage Metro to provide bike storage facilities at Metro Green Line rail stations as the proposed Project does not alter the bike parking outside of the Project area.
Policy C2-4.1: Establish and maintain a citywide traffic count program to ensure the availability of data needed to identify necessary operational improvements to the roadway system.	**No Conflict**. The proposed Project would not preclude the City's ability to maintain a citywide traffic count program as count collection would not be prohibited by the land use buildout or preferred roadway enhancements.
Policy C2-4.2: Continue to increase operational efficiencies of the transportation system by implementing all appropriate Transportation System Management (TSM) measures, including but not limited to improving design standards, upgrading and coordination of traffic control devices, controlling on-street parking, and using sophisticated electronic control methods to supervise the flow of traffic.	**No Conflict**. The proposed Project would not preclude the City's ability to implement TSM measures, including but not limited to improving design standards, upgrading and coordination of traffic control devices, controlling on-street parking, and using sophisticated electronic control methods to supervise the flow of traffic.
Policy C2-5.1: Ensure that Transportation Demand Management (TDM) measures are considered during the evaluation of new developments within the City, including but not limited to ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.	**No Conflict**. The proposed Project would not preclude the City's ability to ensure that TDM measures are considered during the evaluation of new developments within the City. The Project is a program-level plan, which enables the buildout of individual land use projects through 2040. TDM would be incorporated based on individual land use project needs.
Policy C2-5.2: Coordinate activities with neighboring jurisdictions and the El Segundo Employers Association (ESEA) to optimize the effectiveness of Transportation Demand Management (TDM) activities.	**No Conflict**. The proposed Project would not preclude the City's ability to coordinate activities with neighboring jurisdictions and the ESEA to optimize the effectiveness of TDM activities as the proposed Project does not propose changes to City-level TDM policies.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C2-5.3: Encourage the provision of preferential parking for high occupancy vehicles wherever possible.	**No Conflict**. The proposed Project would not preclude the City's ability to encourage the provision of preferential parking for high occupancy vehicles as the proposed Project does not propose changes to City-level TDM policies.
Policy C3-1.1: Require all new development to mitigate project-related impacts on the existing and future circulation system such that all Master Plan roadways and intersections are upgraded and maintained at acceptable levels of service through implementation of all applicable Circulation Element policies. Mitigation measures shall be provided by or paid for by the project developer.	**No Conflict**. As a result of SB 743, intersection level of service (LOS) is no longer a criterion used to assess transportation impacts under CEQA.
Policy C3-1.2: The minimum acceptable level of service (LOS) at an intersection is LOS D. Intersections operating at LOS E or F shall be considered deficient. If traffic caused by a development project is forecast to result in an intersection level of service change from LOS D or better to LOS E or F, then the development impact shall be considered significant. If a development project is forecast to result in the increase of intersection volume/capacity ratio (V/C) of 0.02 or greater at any intersection that is forecast to operate at LOS E or F, the impact shall be considered significant.	**No Conflict**. As a result of SB 743, intersection delay (LOS) is no longer a criterion used to assess transportation impacts under CEQA and cannot be used to determine impacts considered significant.
Policy C3-1.3: Limit intersection improvements to feasible improvements that do not affect buildings, freeway supports, or railroad rights-of-way. Such improvements should not include more than three left-tum lanes, four through lanes, and two right-tum lanes on any approach to an intersection.	**No Conflict**. The proposed Project would not preclude the City's ability to limit intersection improvements to feasible improvements that do not affect buildings, freeway supports, or railroad rights-of-way.
Policy C3-1.4: Encourage development projects that effectively integrate major transportation facilities with land use planning and the surrounding environment. These joint uses will obtain economic and aesthetic benefits of coordinated design, achieve land conservation in space-short urban areas of El Segundo, and maintain neighborhood continuity in built-up areas affected by future major transportation routes.	**No Conflict**. An overarching purpose of the proposed Project is to encourage development projects that effectively integrate major transportation facilities with land use planning and the surrounding environment within the Project area.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C3-1.5: Ensure that transit planning is considered and integrated into all related elements of City planning.	**No Conflict**. The proposed Project would not preclude the City's ability to ensure that transit planning is considered and integrated into all related elements of City Planning. The Project includes recommendations that would support transit operation and planning.
Policy C3-1.6: Apply planning principles and Circulation Element goals, objectives, and policies should apply consistently to all land uses in the City.	**No Conflict**. The proposed Project would not preclude the City's ability to apply planning principles and Circulation Element goals, objectives, and policies consistently to all City land uses. The Project would not enable any specific land uses to preclude planning principles.
Policy C3-1.7: Require submittal and implementation of a Transportation Management Plan (TMP) for all projects within the Urban Mixed-Use area and encourage a TMP for all projects within the northeast quadrant.	**No Conflict**. The proposed Project would not preclude the City's ability to require the submittal and implementation of a TMP for all projects within the Urban Mixed-Use area and encourage a TMP for all projects within the northeast quadrant. Individual development projects enabled by the Project would still be subject to TMP where necessary.
Policy C3-1.8: Require the provision of adequate pedestrian and bicycle access for new development projects through the development review process.	**No Conflict**. The proposed Project would not preclude the City's ability to require the provision of adequate pedestrian and bicycle access for new development projects through the development review process. The Project does not enable developments to override pedestrian or bicycle access provisions in the City's municipal code.
Policy C3-1.9: Ensure that the driveway stacking distance for multi-family housing is evaluated during the development review process.	**No Conflict**. The proposed Project would not preclude the City's ability to ensure that the driveway stacking distance for multi-family housing is evaluated during the development review process as the proposed Project does not propose changes to the development process.
Policy C3-2.1: Ensure the provision of sufficient on-site parking from all new development.	**No Conflict**. The proposed Project would not preclude the City's ability to ensure new development provides sufficient parking as the proposed Project includes a development review process aimed at design review.
Policy C3-2.2: Ensure that the City's parking codes and zoning ordinances are kept up-to-date.	**No Conflict**. The proposed Project would not preclude the City's ability to keep parking codes and zoning ordinances up to date, as the proposed Project updates the parking codes for the Downtown Specific Plan Area. The Project would not preclude such updates outside of the Downtown Specific Plan Area.
Policy C4-1.1: Actively participate in various committees and other planning forums associated with County, Regional, and State Congestion Management Programs.	**No Conflict**. The proposed project would not preclude the City's ability to actively participate in various committees and other planning forums associated with County, Regional, and State Congestion Management programs as the proposed Project does not propose altering the City's role in County, Regional, or State Congestion Management Programs.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C4-1.2: Ensure that the City remains in compliance with the County, Regional, and State Congestion Management Programs (CMP) through the development of appropriate City programs and traffic impact analyses of new projects impacting the CMP routes of Sepulveda Boulevard, the I-105 Freeway, and the I-405 Freeway.	**No Conflict**. The proposed Project would not preclude the City's ability to comply with the County, Regional, or State CMP through the development of appropriate City programs and traffic impact analyses of new projects impacting the CMP routes of Sepulveda Boulevard, the I-105 Freeway, and the I-405 Freeway as the proposed Project does not propose changes to Sepulveda Boulevard, I-105, or I-405.
Policy C4-1.3: Investigate and evaluate the feasibility and merits of adding more routes that are impacted by external traffic sources, to the County CMP highway system.	**No Conflict**. The proposed Project would not preclude the City's ability to investigate and evaluate the feasibility and merits of adding more routes that are impacted by external traffic sources, to the County CMP highway system, as the proposed Project does not propose changes to the process by which CMP routes are identified.
Policy C4-2.1: Ensure that new roadway links are constructed as designated in the Circulation Element and link with existing roadways in neighboring jurisdictions to allow efficient access into and out of the City.	**Consistent**. The proposed Project would not preclude the City's **No Conflict** to ensure that new roadway links are constructed as designated in the Circulation Element and link with existing roadways in neighboring jurisdictions to allow efficient access into and out of the City, as the proposed Project does not propose changes to the construction of planned new roadway links.
Policy C4-2.2: Carefully assess adjacent local agencies' plans to ensure compatibility across political boundaries. This does not imply that such compatibility is a requirement for adoption of the Circulation Element.	**No Conflict**. The proposed Project does not preclude the City's ability to assess adjacent local agencies' plans to ensure compatibility across political boundaries as the proposed Project does not propose changes to the process by which the City reviews adjacent local agencies' plans.
Policy C4-2.3: Continuously monitor and evaluate Los Angeles International Airport (LAX) master planning and evaluate the impacts of LAX on the City's Circulation Element.	**No Conflict**. The proposed Project does not preclude the City's ability to continuously monitor and evaluate Los Angeles International Airport (LAX) master planning and evaluate the impacts of LAX on the City's Circulation Element, as the proposed Project does not propose changes to the process by which the City reviews adjacent local agencies' plans.
Policy C4-2.4: Encourage cooperation with other governmental agencies to provide adequate vehicular traffic movements on streets and through intersections by means of synchronized signalization.	**No Conflict**. The proposed Project does not preclude the City's ability to cooperate with other governmental agencies to provide adequate vehicular traffic movements on streets and through intersections by means of synchronized signalization as the proposed Project does not propose changes to interagency practices.
Policy C4-3.1: Identify and evaluate potential revenue sources for financing circulation system development and improvement projects.	**No Conflict**. The proposed Project includes recommendations for the City to identify and evaluate potential revenue sources for financing circulation system development and improvement projects, particularly with regard to parking supply.

Table IV.L-4
Project Consistency with the Circulation Element

Relevant Goals, Policies, or Objectives	Consistency Analysis
Policy C4-3.2: Update the City's 1996 Traffic Congestion Mitigation Fee Program, to reflect changes in planned improvements requiring funding changing needs and changes in the construction cost index.	**No Conflict**. The proposed Project does not preclude the City's ability to update the City's 1996 Traffic Congestion Mitigation Fee Program to reflect changes in planned improvements requiring funding changing needs and changes in the construction cost index as the proposed Project does not propose changes to funding or financing mechanisms.
Source: Fehr & Peers, El Segundo Downtown Specific Plan Update, Transportation Assessment, January 2024.	

(3) South Bay Bicycle Master Plan

The South Bay BMP is intended to guide the development and maintenance of a comprehensive bicycle network and set of programs and policies throughout the cities of El Segundo, Gardena, Hermosa Beach, Lawndale, Manhattan Beach, Redondo Beach, and Torrance through 2031. Chapter 2 of the South Bay BMP defines goals, objectives, and policy actions, and Chapter 3 includes proposed bicycle facilities for the City of El Segundo specifically. The Project's consistency with the South Bay BMP policies related to transportation is presented in **Table IV.L-5, Project Consistency with the South Bay BMP**, below. As shown in **Table IV.L-5**, the Project would be consistent with the reviewed policies of the South Bay BMP.

Table IV.L-5
Project Consistency with the South Bay BMP

El Segundo Prioritized Bicycle Projects	Consistency Analysis
Bike Routes	
Grand Avenue From West end of Street to Duley Road	**No Conflict**. Within this segment, the extent of Grand Avenue from Concord Street to Eucalyptus Drive is located within the Project area. This segment within the Project area is a designated bike route under existing conditions, and the Project proposes to maintain this designation.
Main Street From Imperial Highway to El Segundo Boulevard	**No Conflict**. Within this segment, the extent of Main Street from Mariposa Avenue to El Segundo Boulevard is located within the Project area. This segment within the Project area is a designated bike route under existing conditions. The Project proposes a bike lane along this segment, which provides additional striping and signage to support bicycle mobility.
Loma Vista Street – Binder Place – Whiting Street – El Segundo Boulevard From Grand Avenue to Main Street	**No Conflict**. Within this segment, the extent of El Segundo Boulevard from west of Richmond Street to Main Street is located within the Project area. The Project proposes no modifications to this segment of El Segundo Boulevard; thus, the Project would not preclude the implementation of this facility.

Table IV.L-5
Project Consistency with the South Bay BMP

El Segundo Prioritized Bicycle Projects	Consistency Analysis
Bike Lane, Bike Route, Bike Path Combination	
El Segundo Boulevard From Main Street to East City Limits	**No Conflict**. Within this segment, the extent of El Segundo Boulevard from Main Street to east of Main Street is located within the Project area. The Project proposes no modifications to this segment of El Segundo Boulevard; thus, the Project would not preclude the implementation of this facility.
Bike Friendly Streets	
Mariposa Avenue From West end of Street to Sepulveda Boulevard	**No Conflict**. Within this segment, the extent of Mariposa Avenue from Marketplace Alley to east of Main Street is located within the Project area. The Project proposes no modifications to this segment of Mariposa Avenue; thus, the Project would not preclude the implementation of this facility.
Sheldon Street – Pine Avenue – Eucalyptus Drive From Imperial Highway to Grand Avenue	**No Conflict**. Within this segment, the extent of Eucalyptus Drive from Grand Avenue to south of Grand Avenue is located within the Project area. The Project proposes no modifications to this segment of Eucalyptus Drive; thus, the Project would not preclude the implementation of this facility.
Source: Fehr & Peers, El Segundo Downtown Specific Plan Update, Transportation Assessment, January 2024.	

(4) Conclusion

As detailed in the discussions and table above, the Project would be consistent the SCAG RTP/SCS, the City of El Segundo General Plan Circulation Element, and the South Bay BMP. As such, the Project would not conflict with the applicable programs, plans, ordinances, and policies addressing the circulation system. No impact would occur and no mitigation would be required.

Threshold (b): Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Per the City's SB 743 Guidelines, VMT/SP and total daily Citywide VMT metrics were developed as previously explained under **Subsection IV.L.4.a.1, Methodology**, and further detailed in **Table IV.L-3, Thresholds of Significance – SB 743 Guidelines**. The analysis in the TA Report utilized the SCAG RTP/SCS ABM for scenario years 2016 without Project, with outputs interpolated to 2023 to produce the Baseline, and 2045 with Project, interpolated to 2040 to produce "2040 with Project" using a similar interpolation methodology. The socioeconomic data for the ABM was obtained from SCAG and updated for the Project area TAZ based on existing parcel data provided by the City and Project buildout through 2040. The adjacent TAZs in which the Smoky Hollow Specific Plan (related project) is located were modified based on the employment projections described in that plan.[11]

The baseline and Project-related VMT/SP and total daily Citywide VMT are presented in **Table IV.L-6, Project VMT Metrics**. As shown in **Table IV.L-6**, the VMT/SP for the Project TAZ was

[11] *City of El Segundo, Smoky Hollow Specific Plan, 2018.*

calculated to be 24.6 VMT/SP, which would be lower than the 2023 baseline of 26.2 VMT/SP. The total daily Citywide VMT in 2040 is estimated to be 1,716,136 VMT, which would be lower than the 2023 Baseline of 1,739,658 VMT. Accordingly, the Project would not result in a higher VMT/SP than the baseline for residential or office projects and would not result in a net increase in Citywide total daily VMT for retail projects. Therefore, implementation of the Project would not conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant and no mitigation would be required.

Table IV.L-6
Project VMT Metrics

Geography	2023 VMT/SP (City Baseline)	2040 VMT/SP (Project TAZ with Project)	Impact Threshold	Significant Impact
Project TAZ 21115000	26.2	24.6	Higher VMT/SP than Baseline	No
Geography	**2023 Total Daily VMT (Baseline)**	**2040 Total Daily VMT (with Project)**	**Impact Threshold**	**Significant Impact**
Citywide	1,739,658	1,716,136	Net Increase in Citywide Total Daily VMT	No

Source: Fehr & Peers, El Segundo Downtown Specific Plan Update, Transportation Assessment, January 2024.

Threshold (c): 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?

The analysis of a project's potential to substantially increase hazards due to a geometric design feature or incompatible uses generally considers the design of access points to, from, and within the Project area and may include safety or operational impacts.

(1) Proposed Pedestrian Network

The Project proposes the following enhancements to the pedestrian network in the Project area:

(a) General Pedestrian Enhancements

- Add mirrors to parking structure, driveway, and alleyway exits to increase the visibility of approaching pedestrians.
- Remove sidewalk obstructions or re-route around obstructions, such as trees, to increase accessibility, especially for those using wheeled devices.
- Upgrade curb cuts at driveways and alleyways to ADA-compliant curb ramps to improve accessibility for those using mobility devices.
- Widen sidewalks on Main Street, Grand Avenue, and Richmond Street segments, according to preferred road sections discussed in Section 3.3.3 of the TA for this Project (**Appendix I.1**).

(b) Midblock Crosswalks

- Install pedestrian signals to better alert drivers to crossing pedestrians and encourage signal compliance.
- Install raised crosswalks for better visibility and awareness of crossing pedestrians.
- Stripe crosswalks with high-visibility continental-style striping to increase their visibility or, at minimum, stripe crosswalk edge-lines to meet California Manual on Uniform Traffic Control Device (MUTCD) standards.
- To better serve users with mobility challenges, upgrade ramps to meet ADA compliance by adding truncated domes, modifying pedestrian push button locations relative to the ramp, and providing audible push buttons.

(c) Controlled Intersection Crosswalks

- Upgrade curb ramps to meet ADA compliance by adding truncated domes and modifying pedestrian push buttons. Crosswalks shall provide decorative paving or continental style striping to increase their visibility. At a minimum, the crosswalk edge-lines shall be striped to meet California Manual on Uniform Traffic Control Device (MUTCD) standards.
- At signalized intersections, install pedestrian countdown heads to meet current standards and inform pedestrians of the remaining walk time available.
- Ensure that pedestrian signals comply with current MUTCD pedestrian clearance time standards, with a standard walking speed of 3.5 feet per second.

All pedestrian network enhancements would be designed and constructed to conform to the latest MUTCD design standards at the individual element implementation level. These enhancements would generally improve pedestrian access and comfort and would be designed as to not introduce geometric design hazards. As such, implementation of the Project's proposed pedestrian network enhancements would not substantially increase hazards.

(2) Proposed Bicycle Network

The Project proposes the roadway cross sections for Main Street and Grand Avenue as described in **Table IV.L-7, Project Preferred Road Section**. The preferred roadway cross sections include a Class III shared bike route with "sharrows" on Grand Avenue, which currently exists on the corridor, and a Class II bicycle lane on Main Street. The proposed bicycle lane on Main Street would provide greater horizontal separation and additional striping between vehicles and cyclists than the Class III bicycle route which currently exists on the corridor. Upon final engineering design of the proposed roadway sections, the bicycle facilities would be signed and striped according to MUTCD standards, as to not introduce geometric design hazards. As such, implementation of the Project's proposed bicycle network would not substantially increase hazards.

Table IV.L-7
Project Preferred Road Section

Road	Approximate Extents	Existing Typical Section	Preferred Typical Section [1]	Geometric Hazard Impact
Main Street	El Segundo Blvd to Mariposa Ave	12' sidewalks (both sides) 8' parallel parking (both sides) Four 10' travel lanes (two each direction) with "sharrows"	15' outdoor dining/sidewalks (both sides) 8' parallel parking (both sides) 6' bicycle lane (one each direction) Two 11' travel lanes (one each direction)	Generally, improves pedestrian and cyclist comfort All sidewalks, parking lanes, travel lanes, bicycle facilities to be designed to MUTCD standards **Less than significant impact**
Grand Avenue	Standard St to Concord St	10' sidewalks (both sides) 8' parallel parking (both sides of street and median) Four 11' travel lanes (two each direction) with "sharrows" 4' median	18' outdoor dining/sidewalks (both sides) 16' angled parking (both sides) Two 12' travel lanes (one each direction) with "sharrows" 8' median	Generally, improves pedestrian comfort Back-in angled parking to reduce modal conflicts All sidewalks, parking lanes, travel lanes, bicycle facilities to be designed to MUTCD standards **Less than significant impact**
Richmond Street	Grand Ave to Franklin Ave	8-10' sidewalks (both sides) 13' angled parking (one side, front-in) 7' parallel parking (one side) Two 11' travel lanes (one each direction)	19' outdoor dining/sidewalks (both sides) Two 11' travel lanes (one each direction)	Generally, improves pedestrian comfort All sidewalks and travel lanes to be designed to MUTCD standards **Less than significant impact**

1 Dimensions are approximate. Exact dimensions to be determined during engineering design.
Source: Fehr & Peers, El Segundo Downtown Specific Plan Update, Transportation Assessment, January 2024.

(3) Proposed Roadway Sections

The Project proposes modified roadway cross sections for Main Street, Grand Avenue, and Richmond Street. As detailed in **Table IV.L-7**, **Project Preferred Road Section**, the preferred cross sections would generally improve pedestrian comfort and would reduce modal conflicts. Upon final engineering design of the proposed roadway sections, all sidewalks and travel lanes would be designed and constructed to conform to the latest MUTCD design standards. As such, implementation of the Project's proposed roadway sections would not substantially increase hazards.

(4) Proposed Vehicular Circulation Enhancements

The Project proposes the following enhancements to the vehicular network in the Project area:

- Protected left turn phases could be added in all directions at the intersection of Main Street and Grand Avenue to reduce left turn conflicts with oncoming vehicles and pedestrians in the adjacent crosswalk.
- All side-street stop-controlled intersections should include stop signs and stop bars on the controlled approaches to reduce right-of-way confusion.

These enhancements would generally reduce the potential for vehicle conflicts and would be designed according to MUTCD standards as to not introduce geometric design hazards. As such, implementation of the Project's proposed vehicular circulation enhancements would not substantially increase hazards.

(5) Proposed Public Transit Amenities

The Project proposes the following enhancements to the bus stops in the Project area:

- Provide transit shelters at Project area bus stops, where space allows. Transit shelters could be designed to reflect City or Downtown community aesthetic desires.
- At a minimum, include a bench and waste bin at each bus stop.
- Increase bus zone length by extending red curb at stops, to at least 35 feet where feasible.

These enhancements would provide greater rider comfort and reduce the potential for bus-vehicle conflicts. Transit stop enhancements would be designed according to MUTCD standards as to not introduce geometric design hazards. As such, implementation of the Project's proposed public transit amenities would not substantially increase hazards.

(6) Proposed Parking Enhancements

The Project proposes both on- and off-street physical parking enhancements in the Project area as described below:

(a) On-Street Parking

- Stripe all available parallel parking spaces with delineation lines to minimize inefficient parking behavior and draw attention to available spaces.
- Re-stripe parking spaces to be "back-in" to increase driver visibility of cyclists and other vehicles while exiting parking spaces.

(b) Off-Street Parking

- Install increased parking wayfinding signage on streets adjacent to public parking structures or online parking maps.
- Install signage on the Richmond Street and Marketplace Alley entrances to the parking structure that directs drivers searching for public parking to the Grand Avenue entrance.
- Install a dynamic "spaces available" sign system in the parking structure to optimize utilization of existing supply.
- Encourage or require subterranean garages for larger new development that are for office or residential use only.
- Further analyze the feasibility of new parking structures at the northeast corner of Richmond Street and Franklin Avenue and at the northwest corner of Grand Avenue and Standard Street to increase off-street parking supply buffer to support future development and growth in activity levels within the Project area.

These enhancements would be designed according to MUTCD standards as to not introduce geometric design hazards. As such, implementation of the Project's proposed parking enhancements would not substantially increase hazards.

(7) Proposed Placemaking Enhancements

The Project proposes the following placemaking enhancements on Richmond Street (between Grand Avenue and north of Franklin Street) in the Project area:

- Install in-road bollard receptacles at both ends of the segment, similar to those on Main Street, to allow ongoing temporary closures, while maintaining vehicle access during non-event periods.

This enhancement would provide greater pedestrian comfort than existing conditions. Final engineering design of this placemaking enhancement would be designed and constructed according to MUTCD standards as to not introduce geometric design hazards. As such, implementation of the Project's proposed placemaking enhancements would not substantially increase hazards.

(8) Conclusion

As discussed above, the Project proposes enhancements to the pedestrian network, bicycle network, roadway sections, vehicular circulation, public transit amenities, parking, and placemaking within the Project Study Area. In general, the enhancements would improve existing pedestrian, cyclist, and transit user comfort and experiences. Furthermore, all enhancements would be designed and constructed to conform to the latest MUTCD design standards. Therefore, implementation of the Project would not substantially increase hazards due to geometric hazards. In addition, no incompatible uses would be introduced and no existing incompatible uses would

be exacerbated by the Project. As such, impacts would be less than significant and no mitigation would be required.

Threshold (d): Would the project result in inadequate emergency access?

This section includes a discussion of the impacts regarding the potential for inadequate emergency access resulting from the Project, with individual analyses of Medical, Fire, and Police access. As described in **Table IV.L-7**, **Project Preferred Road Section**, the Project includes roadway section modifications on Main Street, Grand Avenue, and Richmond Street. The preferred sections for Main Street and Grand Avenue would both result in a reduction in the number of travel lanes from two lanes in each direction to one lane in each direction (each travel lane would be 11 feet wide along Main Street and each travel lane would be 12 feet wide along Grand Avenue). As most streets within and surrounding the Project area consist of one travel lane in each direction, including Mariposa Avenue, Franklin Avenue, and Maple Avenue, this preferred roadway section would not present unusual driving conditions for the area. Furthermore, relatively frequent side-streets, driveways, and alleyways (approximately every 150-460 feet) would continue to provide opportunities for vehicles to pull over and allow the passage of emergency vehicles, despite the reduction in number of travel lanes. Additionally, travel lanes along Main Street would not be divided, which would allow a clear path of travel for emergency vehicles down the roadway centerline once vehicles have pulled to the side.

If the previously described vehicular circulation enhancements are implemented, emergency vehicle preemption (EVP) would be included as a project design feature during the planning and implementation of those specific improvements. Emergency vehicle preemption is a traffic control strategy whereby a green light for emergency vehicles is provided and red lights are provided to other vehicular paths of travel which cross the path of emergency vehicles. EVP aims to improve driver awareness of emergency vehicles and serve as a reminder to yield to the right-of-way, increasing overall safety. An evaluation of EVP performance conducted by the Federal Highway Administration showed a decrease in collisions involving emergency vehicles and an improvement in emergency response times.[12]

(1) Emergency Medical Access

The most proximate hospital with an emergency room to the Project area is Centinela Hospital Medical Center in Inglewood, 6.5 miles to the northeast. **Table IV.L-8, Medical Access to Centinela Hospital Medical Center**, summarizes two typical routes between the Project area (defined as the intersection of Concord Street and Grand Avenue, the westernmost intersection in the Project area), the distance and approximate peak hour travel time between the Project area and Centinela Hospital Medical Center, and the portion of that distance and travel time that would occur on a street segment with a lane reduction with the preferred roadway sections (either Main Street or Grand Avenue).

[12] *United States Joint Program Office for Intelligent Transportation Systems and United States National Highway Traffic Safety Administration, Emergency Medical Services Division, Traffic Signal Preemption for Emergency Vehicles: A Cross-Cutting Study: Putting the "First" in "First Response," Report Number: FHWA-JPO-05-010; NTIS-PB2006107709, January 1, 2006.*

Table IV.L-8
Medical Access to Centinela Hospital Medical Center

Road	Total Distance	Distance on Reduced-Lane Segment	Typical Peak Hour Travel Time [1]	Existing Typical Travel Time (segment proposed for travel lane reduction)	Existing Typical Travel Time (route with similar existing geometry to preferred road section) [2]
(North) Grand Ave, Main St, Imperial Hwy, I-105	6.5 miles	0.3-mile	16-35 min	3 min	3 min [3]
(South) Grand Ave, Main St, El Segundo Blvd, I-105	6.5 miles	0.3-mile	14-35 min	3 min	2 min [4]

1 Typical Peak Hour Travel time is based on Google Maps "depart at" estimated for Wednesday, March 1st at 5:00 p.m. This time estimate is for private vehicles that would be subject to queuing and red lights, which emergency vehicles can typically bypass or proceed through.
*2 Routes with similar existing geometry are those which have the same number of travel lanes as Grand Avenue and Main Street would have following implementation of the Project's preferred roadway sections detailed in **Table IV.L-7, Project Preferred Road Section**. These routes are assumed to have a similar travel time per distance as Grand Avenue and Main Street would have following implementation.*
3 Similar geometry route consists of Concord Street to Mariposa Avenue, which have one lane in each direction.
4 Similar geometry routes consist of Concord Street and El Segundo Boulevard, both of which have one lane in each direction.
Source: Fehr & Peers, El Segundo Downtown Specific Plan Update, Transportation Assessment, January 2024.

For the north route to Centinela Hospital Medical Center (via I-105), typically about three minutes of the travel time on this route would occur on a street with a lane reduction under the Project's preferred roadway sections. Utilizing a similar route, of only two-lane (one each direction) roadways, via Concord Street and Mariposa Avenue instead of Grand Avenue and Main Street, the travel time is also three minutes.

For the south route to Centinela Hospital Medical Center (via I-405) typically, about three minutes of the usual 14–35-minute travel time on this route would occur on a street with a lane reduction under the Project's preferred roadway sections, depending on traffic conditions. Utilizing a similar route, of only two-lane (one each direction) roadways, via Concord Street and El Segundo Boulevard instead of Grand Avenue and Main Street, the travel time is also three minutes. Additionally, should the modified roadway cross sections on Grand Avenue and Main Street be considered undesirable for emergency medical vehicle travel, the similar routes discussed above could serve as alternate routes to the nearest emergency room.

This comparison, for both the north and south routes to Centinela Hospital Medical Center indicates that the emergency vehicle access would remain similar to the existing condition following implementation of the Project's preferred roadway section enhancements.

(2) Emergency Fire Access

The preferred roadway sections for Main Street and Grand Avenue would be designed to allow fire vehicle access to hydrants, with accompanying striping and signage where necessary.

There is currently an El Segundo Fire Department (ESFD) Station (Station #1) located within the Project area, with a driveway located approximately 200 feet north of the intersection of Main Street and Grand Avenue. Following the evaluation from the Emergency Medical Access determination discussed above, emergency vehicle travel time from Station #1 to any point within the Project area is expected to be similar with the preferred roadway sections on Main Street and Grand Avenue as under existing conditions.

(3) Police Access

The El Segundo Police Department (ESPD) Headquarters is currently located within the Project area. Following reasoning from the Emergency Medical Access and Emergency Fire Access determinations discussed above, emergency vehicle travel time from the ESPD Headquarters to any point within the Project area is expected to be similar with the preferred roadway sections on Main Street and Grand Avenue as it is currently.

(4) Conclusion

As discussed above, following implementation of the Project's vehicular circulation enhancements, travel time throughout the Project area would be similar as under existing conditions. Furthermore, pursuant to Section 21806 of the California Vehicle Code, drivers of police emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, implementation of the Project would not result in inadequate emergency access. As such, impacts would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

As detailed in **Table II-1, List of Related Projects,** in **Section II, Environmental Setting**, of this EIR, there are 13 related projects in the City that could cumulatively increase the potential for impacts related to transportation through the development of residential, office, and various commercial land uses.

a) Consistency with Circulation System Programs, Plans, Ordinances, and Policies

As described in the analysis above, the Specific Plan Update would be consistent with applicable programs, plans, ordinances, and policies related to the circulation system. Therefore, the Project's contribution to a cumulative impact on circulation system plans would not be cumulatively considerable and cumulative impacts related to a program, plan, ordinance, or policy related to addressing the circulation system would be less than significant.

b) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As detailed in the analysis above, the Specific Plan Update would not result in a higher VMT/SP than the baseline for residential or office projects and would not result in a net increase in Citywide total daily VMT for retail projects, and would, therefore, not create a transportation impact itself. While the analysis of the Specific Plan Update cannot be used to determine the impact of individual development projects that would occur within the Project area or other related projects throughout the City, the inclusion of the regionally used future forecasts accounts for potential cumulative impacts in this analysis. The City's *SB 743 Implementation Guidelines* establishes that a project that would not have a significant impact under baseline plus project conditions, would not be required to undertake a cumulative analysis with regard to VMT. Therefore, the Project's VMT would not be cumulatively considerable and cumulative impacts related to VMT would be less than significant.

c) Geometric Design Hazards

As detailed in the analysis above, the Specific Plan Update does not include any elements that would promote sharp curves, dangerous intersections, or incompatible uses that could present safety hazards. Although the Specific Plan Update describes a reasonably expected future and cannot constitute a commitment to any project-specific development, individual related projects that would occur within the Project area would be expected to be designed and constructed according to MUTCD standards as to not introduce geometric design hazards. Development of other related projects that would occur within the boundaries of the City would also be subject to MUTCD standards as applicable. Because the Project would not result in significant impacts with regard to hazardous design features, the Project's contribution to the impact would not be cumulatively considerable and cumulative impacts related to hazardous design features would be less than significant.

d) Inadequate Emergency Access

As discussed in the analysis above, implementation of the Project's preferred roadway sections would not alter travel time within the Project area and would, accordingly, not result in inadequate emergency access. It is possible that the addition of Project-related traffic to the City's roadways could cumulatively increase response times within the City when combined with development of other related projects that would occur within the City; however, the City would continue to evaluate future development projects proposed pursuant to the Specific Plan Update and throughout the City as they are proposed to ensure compliance with all applicable access requirements and regulations. Furthermore, pursuant to California Vehicle Code Section 21806, emergency vehicles have priority on streets with sirens, options to avoid traffic with sirens, and drive in opposing traffic lanes. As such, the Project's contribution to emergency access impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

6. Mitigation Measures

Project-level and cumulative impacts with regard to transportation would be less than significant. Therefore, no mitigation measures would be required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to transportation would be less than significant.

8. References

City of El Segundo, City of El Segundo General Plan, Chapter 4, Circulation Element, adopted September 2004.

City of El Segundo, Climate Action Plan, December 2017.

City of El Segundo, SB 743 Implementation Guidelines, May 2022, adopted September 2022.

City of Los Angeles, VMT Calculator Documentation, Version 1.3, May 2020.

Fehr & Peers, El Segundo Downtown Specific Plan Update, Local Transportation Assessment, January 2024.

Fehr & Peers, El Segundo Downtown Specific Plan Update, Transportation Assessment, January 2024.

Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition, The South Bay Bicycle Master Plan, August 2011.

Southern California Association of Governments, 2016 Regional Travel Demand Model Validation, 2020.

United States Joint Program Office for Intelligent Transportation Systems and United States National Highway Traffic Safety Administration, Emergency Medical Services Division, Traffic Signal Preemption for Emergency Vehicles: A Cross-Cutting Study: Putting the "First" in "First Response," Report Number: FHWA-JPO-05-010; NTIS-PB2006107709, January 1, 2006.

IV. Environmental Impact Analysis

M. Tribal Cultural Resources

1. Introduction

This section describes the existing tribal cultural resources (TRCs) conditions of the El Segundo Downtown Specific Plan Update (Project) site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. The analysis in this section is based in part on information provided in the archaeological data search prepared by the South Central Coastal Information Center (SCCIC), Department of Anthropology, California State University at Fullerton, dated June 26, 2023, and the results of consultation with California Native American Tribes conducted by the City of El Segundo (City) for the Project, as required by the California Environmental Quality Act (CEQA) as amended by Assembly Bill (AB) 52. The Native American consultation documentation is provided in **Appendix J** of this Draft EIR. Other sources consulted are listed in **Section IV.M.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in Chapter I, Introduction, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Project Site Conditions

The Specific Plan Update area (Project area) is located in Downtown El Segundo, in the northwest quadrant of the City, which is approximately 20 miles southwest from downtown Los Angeles. Downtown El Segundo is located southwest of the interchange of Interstate 405 Freeway (I-405) and State Route 90 (Imperial Highway), west of Pacific Coast Highway and north of El Segundo Boulevard. Interstate 105 Freeway (I-105) is north of the Specific Plan area, immediately north of Imperial Highway.

The Project area is approximately 43.8 acres in size. The Project area is irregular in shape with portions extending to Eucalyptus Drive to the east, El Segundo Boulevard to the south, Concord Street to the west, and Mariposa Avenue to the north. Los Angeles International Airport (LAX) is located to the north; the Los Angeles County community of Del Aire and the City of Hawthorne are located to the east; the Cities of Manhattan Beach and Hawthorne are located to the south; and the Hyperion Wastewater Treatment Plant, Dockweiler Beach, and Pacific Ocean are located to the west.

Topography within the El Segundo Downtown Specific Plan Update area is comprised of rolling topography.[1] Elevations range from approximately 100 to 150 feet above mean sea level.[2]

As the majority of the Project area has been previously developed, the underlying soils are likely to be comprised of sand with varying amount of silt and clay materials. Artificial fill will most likely be present within the area due to previous and recent developments. Existing artificial fill are anticipated to be unsuitable to support proposed site developments in their current condition. This condition can be mitigated by removing and recompacting these materials. Once these materials are removed, they are anticipated to be suitable for reuse as compacted fill. Subsurface soils are anticipated to be relatively easy to excavate with conventional heavy earthmoving equipment. Removal and recompaction of the site materials will result in some moderate shrinkage and subsidence. Design of site grading will require consideration of this loss when evaluating earthwork balance issues.

b) Ethnohistoric Overview

The Project Site is located within, but not necessarily limited to, a geographical area of interest identified by one California Native American tribe, the Gabrieleño Band of Mission Indians - Kizh Nation. Native American territorial occupation of the area is traditionally assigned to the Gabrielino, or Tongva.[3] The Gabrielino once occupied the entire Los Angeles Basin and the San Fernando Valley, including the watersheds of the San Gabriel, Santa Ana, and Los Angeles Rivers. As such, a description of Gabrielino ethnography is provided.

At the time of European contact, the Native Americans subsequently known as the Gabrielino Indians occupied nearly the entire basin comprising the Counties of Los Angeles and Orange. They belonged to the Takic family of the Uto-Aztecan linguistic stock. Named after the Mission San Gabriel, the Gabrielino are considered to have been one of the two wealthiest and largest ethnic groups in aboriginal Southern California,[4] the other being the Chumash. This was largely due to the many natural resources within the land base they controlled, primarily the rich coastal section from Topanga Canyon to Aliso Creek and the offshore islands of San Clemente, San Nicholas, and Santa Catalina.

The Gabrielino arrived in the Los Angeles basin around 500 BC and began to expand throughout the area, displacing a preexisting Hokan-speaking population. The first Spanish contact with the Gabrielino took place in 1520, when Juan Rodríguez Cabrillo arrived in Santa Catalina Island. In 1602, the Spanish returned to Santa Catalina under Sebastián Vizcaíno, and in 1769, Gaspar de Portolá made the first attempt to colonize Gabrielino territory. By 1771, the Spanish had built four

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1 *City of El Segundo. City of El Segundo Downtown Specific Plan. Adopted August 1, 2000, website: https://www.elsegundo.org/home/showpublisheddocument/353/637110571779530000. Accessed March 2023.*

2 *USGS Survey, California, Los Angeles County, Venice Quadrangle, 7-5 minute Series, 2021. Accessed July 2023.*

3 *Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer Washington, DC: Smithsonian Institution, 538.*

4 *Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer. Washington, DC: Smithsonian Institution, 538.*

missions, and the decimation of the Gabrielino had already begun.[5] European diseases and conflicts among the Gabrielino population, as well as conversion to Christianity, carried a toll in their numbers, traditions, and beliefs.

Although determining an accurate account of the population numbers is difficult, Bean and Smith[6] state that by AD 500, the Gabrielino established permanent settlements, and their population continued to grow. Early Spanish accounts indicate that the Gabrielino lived in permanent villages ranging from 50 to 200 individuals. The Gabrielino population surpassed 5,000 people by around 1770.

Several types of structures characterized the Gabrielino villages. They lived in domed circular structures covered with tule, fern, or carrizo. Communal structures measured over 60 feet in diameter and could house three or four families. Sweathouses, menstrual huts, and a ceremonial enclosure were also part of the village arrangements.[7]

The Gabrielino practiced different subsistence strategies that included hunting, fishing, and gathering. Hunting activities on land were carried out with the use of bow and arrow, deadfalls, snares, and traps. Smoke and throwing clubs also were used to assist with the hunt of burrowing animals. Aquatic animals were hunted with harpoons, spear-throwers, and clubs. Although most fishing activities took place along rivers and from shore, open water fishing trips between mainland and the islands also took place using boats made from wood planks and asphaltum. The Gabrielino fishing equipment included fishhooks made of shells, nets, basketry traps, and poison substances obtained from plants.

The Gabrielino diet included a large number of animals, such as deer, rabbit, squirrel, snake, and rats, as well as a wide variety of insects. However, some meat taboos also existed. The meat of bears, rattlesnakes, stingrays, and ravens were not consumed; these animals were believed to be messengers of the god Chengiichngech. Aquatic animals such as fish, whales, seals, sea otters, and shellfish were also an important part of the diet, mainly among the coastal population.[8]

A variety of plant foods were consumed by the Gabrielino, the main one being acorns. These nuts are rich in nutrients and have a high content of fiber and fat. Other plants used for consumption by the Gabrielino include the seeds of the Islay (Prunus ilicifolia), which were ground into a meal, and the seeds and shoots of the Chía (Salvia columbariae), which were eaten raw, made into loaves, or mixed with water to make a beverage. Roots and bulbs were also part of the diet among the mainland and island groups, as well as clover, wild sunflower seeds, and cholla seeds. Wild tobacco was used for medicinal purposes and as a sedative and narcotic.[9]

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[5] *Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer. Washington, DC: Smithsonian Institution, 540-541.*

[6] *Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer. Washington, DC: Smithsonian Institution, 540.*

[7] *Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer. Washington, DC: Smithsonian Institution, 542.*

[9] *McCawley, W. 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Banning, CA: Malki Museum Press, 128–131.*

The Gabrielinos were involved in trade among themselves and with other groups. Coastal Gabrielinos exchanged steatite, shell and shell beads, dried fish, sea otter pelts, and salt with inland groups for acorns, seeds, obsidian, and deerskins.[10] During the late prehistoric period, the principal trade item, both among the Gabrielino and for export to other groups, was steatite. Also known as soapstone or soaprock, major outcroppings of steatite are found on Santa Catalina Island. Steatite was widely used among the Gabrielino to make arrow straighteners and artistic or ritualistic objects. In addition, this rock was used in the making of functional objects for food preparation such as bowls, mortars, pestles, and comals.[11] Archaeological data indicate that a steatite "industry" developed prehistorically on the island that involved the large-scale trade of both raw materials and finished artifacts to mainland communities.[12]

c) Assembly Bill 52 Consultation

In compliance with the requirements of AB 52, the City of El Segundo (City) Community Development Department provided formal notification of the Project on January 12, 2023. Letters were sent via certified mail to the following California Native America tribes on the City's AB 52 contact list:

1. Gabrielino-Tongva Tribe
2. Gabrielino /Tongva Nation
3. Gabrielino Tongva Indians of California Tribal Council
4. Gabrieleno/Tongva San Gabriel Band of Mission Indians
5. Gabrieleno Band of Mission Indians – Kizh Nation

Tribal Chairman Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation, was the only tribal representative who responded to the Project notification conducted by the City.

On January 20, 2023, consultation was requested to occur between the Department of City Planning staff and the representatives from the Gabrieleño Band of Mission Indians – Kizh Nation for all future projects located within the El Segundo Downtown Specific Plan Update. The Tribal Chairman Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation did not request consultation on the El Segundo Downtown Specific Plan Update.

No communication or request for consultation was received from any of the other notified tribes within the 30-day response period, which ended February 12, 2023**.** Copies of notification letters are included as **Appendix J**, of the Draft EIR.

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[10] *Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer. Washington, DC: Smithsonian Institution, 547.*

[11] *Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer. Washington, DC: Smithsonian Institution, 547.*

[12] *Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer. Washington, DC: Smithsonian Institution, 547.*

d) SCCIC Records Search

A resource records search for the Project was conducted by SCCIC. The records search by SCCIC consisted of a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest, the California Historical Landmarks, the California Register of Historical Resources (the "California Register"), the National Register of Historic Places (the "National Register"), and the California State Historic Properties Directory listings, were reviewed for the Project Site and a half-mile radius around the Project Site. As set forth in Public Resources Code ("PRC") Section 21074, tribal cultural resources are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.[13] The results of the search are presented in **Table IV.M-1, Archaeological Resources Search Results**. Due to the sensitive nature of cultural resources, archaeological site locations are not released.[14] As shown in **Table IV.M-1**, there are no archaeological sites located within the Project Site; or within a half-mile radius of the Project Site. In addition, the Project Site has not been surveyed for the presence of archaeological resources. The records search notes that this does not preclude the potential for an archaeological resource to be identified during construction activities associated with the Project.

Table IV.M-1
Archaeological Resources Search Results

Search	Results	
	Within Project Site	Within half-mile radius of Project Site
Archaeological Resources	0	0
Built-Environment Resources	1	5
Reports and Studies	3	14
OHP Built Environmental Resources Directory (BERD) 2019	22	1
California Points of Historical Interest (SPHI) 2019	0	0
California Historical Landmarks (SHL) 2019	0	0
California Register of Historical Resources (CAL REG) 2019	0	0
National Register of Historic Places (NRHP) 2019	0	0

Source: SCCIC Record Search Results for Various APNs in Downtown El Segundo, June 26, 2023.

[13] *PRC Section 5020.1(k) states the following: "Local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.*

[14] *SCCIC Record Search Results for Various APNs in Downtown El Segundo, June 26, 2023.*

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) National Historic Preservation Act

The National Register of Historic Places (NRHP) is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
B. That are associated with the lives of persons significant in our past; or
C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in NRHP guidance, How to Apply the National Register Criteria, as "the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity" (NPS 1997). NRHP guidance further asserts that properties be completed at least 50 years ago to be considered for eligibility. Properties completed fewer than 50 years before evaluation must be proven to be "exceptionally important" (consideration criteria G) to be considered for listing.

A historic property is defined as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an

Indian tribe or Native Hawaiian organization and that meet the NRHP criteria" (Title 36 Code of Federal Regulations Sections 800.16[i][1]).

b) State

(1) Tribal Consultation

Senate Bill 18, Tribal Consultation, U.S. Government Code Section 65352.3, requires local governments to consult with California Native American Tribes identified by the NAHC regarding proposed local land use planning decisions and prior to the adoption of amendment of a general plan or specific plan. The purpose of this consultation process is to preserve or mitigate impacts to cultural sites and resources.

In addition to Senate Bill 18, Assembly Bill 52 includes provisions in the Public Resources Code (PRC) concerning the evaluation of impacts on TCRs under the California Environmental Quality Act (CEQA), as well as consultation requirements with California Native American tribes. Assembly Bill 52 requires lead agencies to analyze a project's impacts on TCRs separate from archaeological resources. Assembly Bill 52 also requires lead agencies to engage in additional consultation procedures with respect to Native American tribes.

A TCR is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) if Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Mitigation measures for TCRs must be developed in consultation with the affected Native American tribe pursuant to Section 21080.3.2 or according to Section 21084.3, which identified mitigation measures that include avoidance and preservation of TCRs and treating them with culturally appropriate dignity.

(2) California Register of Historic Resources

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Is associated with the lives of persons important in our past.
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

(3) California Environmental Quality Act

As described further below, the following State CEQA Statute and Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5(a) define “historical resources.” In addition, *State CEQA Guidelines* Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource”; it also defines the circumstances when a project would materially impair the significance of an historical resource.
- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and *State CEQA Guidelines* Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b)-(c) and *State CEQA Guidelines* Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological sites.

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC

Section 21084.1; 14 CCR 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[q]), it is a historical resource and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; 14 CCR 15064.5[a]).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (14 CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of an historical resource is materially impaired when a project (14 CCR 15064.5[b][2]):

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a]-[c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.

- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

State CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

(4) California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5b). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (Section 7050.5c). The NAHC will notify the most likely descendant. With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by the NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

c) Regional and Local

There are no local policies related to TCRs that are applicable to the Project.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate Project impacts to tribal cultural resources are based on Appendix G of the *State CEQA Guidelines*. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to tribal cultural resources would occur if the Project would:

Threshold (a): ***Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 Section 5020.1(k); and

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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

b) Analysis of Project Impacts

Threshold (a): Would the Project Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 Section 5020.1(k); and

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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52, signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact TCRs and establishes a formal notification and, if requested, consultation process for California Native American Tribes as part of CEQA. TCR includes sites, 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 or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine

that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe. As mentioned above, a TCR includes sites, 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, are included in a local register of historical resources, or are otherwise determined by the lead agency to be significant based on substantial evidence.

In compliance with the requirements of AB 52, the City of El Segundo (City) Community Development Department provided formal notification of the Project on January 12, 2023. Letters were sent via certified mail to the following California Native America tribes on the City's AB 52 contact list:

1. Gabrielino-Tongva Tribe
2. Gabrielino /Tongva Nation
3. Gabrielino Tongva Indians of California Tribal Council
4. Gabrieleno/Tongva San Gabriel Band of Mission Indians
5. Gabrieleno Band of Mission Indians – Kizh Nation

Tribal Chairman Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation, was the only tribal representative who responded to the Project notification conducted by the City.

On January 20, 2023, consultation was requested to occur between the Department of City Planning staff and the representatives from the Gabrieleño Band of Mission Indians – Kizh Nation for all future projects located within the El Segundo Downtown Specific Plan Update. The Tribal Chairman Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation did not request consultation on the El Segundo Downtown Specific Plan Update.

The 30-day notification response window closed on February 12, 2023. The Gabrieleño Band of Mission Indians – Kizh Nation submitted a letter to the City on January 20, 2023 stating that they agree with the Specific Plan Update, however they would like to request consultation for all future projects within the Project Site, as the Project Site is located within their Ancestral territory which may have potential for discoveries of cultural resources. **Figure IV.M-1, 1860-1937 Historical Map** is a copy of the 1860-1938 Kirkman-Harriman Los Angeles County Historical Map. The historical map shows the location of historic sites including: tribal lands and missions, battle fields, Indian villages, gold mines, and various roads. The Project Site is located near the Old Salt Road trade route, and is 6 miles north of the L.A. Salt Works Salt Pond and Indian Village.

Based on the records search conducted for the Project, the Project Site is considered sensitive for potential tribal cultural resources. Project grading and excavation activities to depths not previously disturbed may encounter these resources, and thus impacts to TCRs may be potentially significant. With the implementation of **Mitigation Measure** (**MM) TCR-1**, which would provide for Native American Monitor during future Project grading and excavation activities, impacts on TCRs would be reduced to a level of less than significant.

Figure IV.M-1
1860-1937 Historical Map

5. Cumulative Impact Analysis

The study area for cumulative impacts to tribal cultural resources is the extent of the geographic area with which the identified tribes are traditionally and culturally affiliated. Although the Project Site is located near tribal lands, villages, L.A. Salt Works and Salt Pond, and the Old Salt Road trade route, the Project Site does not contain any known tribal cultural resources, nor did search results by SCCIC, provide substantial evidence as to the presence of tribal cultural resources on the Project Site. However, the Project Site is considered sensitive for potential tribal cultural resources. Future projects within this area requiring the preparation of an IS/ND, IS/MND, or EIR are subject to the requirements of AB 52, which includes notifying tribes to solicit consultation and to analyze potential impact of tribal cultural resources. Compliance with existing regulatory measures safeguarding tribal cultural resources would ensure potential impacts from inadvertent discovery would be reduced to a less-than-significant level. Any project sites that contain tribal cultural resources would be required to comply with regulations and/or safeguard mitigation measures to reduce potential impacts to the greatest extent feasible. Nonetheless, as impacts related to tribal cultural resources within the Project Site would be less than significant, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact.

6. Mitigation Measures

MM TCR-1: Prior to issuance of a grading permit for future projects, the future project Applicants shall retain a qualified Native American Monitor (Monitor) from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading and excavation activities within the Project Site. The Monitor shall photo-document the grading and excavation activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations and mappings of the graded areas, soils, and documentation of any identified tribal cultural resources. On-site monitoring shall end when the Project Site grading and excavation activities are completed, or when the Tribal Representatives and Monitor have indicated that the Project Site has a low potential for archaeological resources. If tribal cultural resources are encountered during monitoring, all ground-disturbing activities within 50 feet of the find shall cease and the Monitor shall evaluate the significance of the find, and if significant, recommend a formal treatment plan and appropriate measure(s) to mitigate impacts. Such measure(s) may include avoidance, preservation in place, archaeological data recovery and associated laboratory documentation, or other appropriate measures. The City shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Applicant shall implement all measure(s) that the City determined necessary, appropriate, and feasible. Within 60 days after grading and excavation activities are completed, the Monitor shall prepare and submit a final report to the City and the California Native American Heritage Commission. The report shall include documentation of any recovered tribal cultural resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor

shall submit the monitoring log and photo documentation, accompanied by a photo key, to the City.

7. Level of Significance After Mitigation

With implementation of **MM TCR-1**, Project impacts related to tribal cultural resources would be less than significant.

Cumulative impacts related to tribal cultural resources would be less than significant.

8. References

Bean, L.J., and C.R. Smith. 1978. "Gabrielino." In Handbook of North American Indians, Vol. 8, ed. R.F. Heizer Washington, DC: Smithsonian Institution, 538.

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PRC Section 5020.1(k) states the following: "Local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

SCCIC Record Search Results for Various APNs in Downtown El Segundo, June 26, 2023.

USGS Survey, California, Los Angeles County, Venice Quadrangle, 7-5 minute Series, 2021. Accessed July 2023.

IV. Environmental Impact Analysis

N. Utilities and Service Systems

1. Water Supply and Infrastructure

1. Introduction

This section describes the potential impacts on water supply and whether the El Segundo Downtown Specific Plan Update (Project) would require or result in the construction of new water treatment facilities, including conveyance infrastructure, the construction of which would cause significant environmental effects, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. The data and conclusions in this section regarding the availability of water supply to serve the Project are based the *El Segundo Downtown Specific Plan Update Water Supply Assessment* (WSA), prepared by Maddaus Water Management inc., dated December 2023, and included in **Appendix K** of this Draft EIR. Other sources consulted are listed in **Section IV.N.1.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Potable Water Supply

(1) Metropolitan Water District of Southern California

Metropolitan Water District of Southern California (MWD) is the largest water wholesaler for domestic and municipal uses in California and provides water to nearly 19 million people, with an average of 1.7 billion gallons of water per day. MWD imports a portion of its water supplies from Northern California through the State Water Project's (SWP) California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. The City of El Segundo (City) purchases water from West Basin Municipal Water District (WBMWD), which is supplied through MWD. The City and WBMWD rely more heavily on MWD water during drier years. The record dry and hot conditions of 2014 significantly impacted the water resources of both the State of California and MWD. As a result, in 2015, MWD implemented a Water Supply Allocation Plan, for allocating water supplies during periods of shortage. In May 2016, citing improved water supply conditions and reduced water use due to conservation, MWD voted to end the Water Supply

Allocation Plan. By April 2017, citing improved water supply conditions, MWD voted to downgrade the water shortage classification to a Condition 1 Water Supply Watch. MWD's long-term plans to meet its member agencies' growing reliability needs are through: improvements to the State Water Project, conjunctive management efforts on the Colorado River, water transfer programs, outdoor conservation measures, and development of additional local resources, such as recycling, brackish water desalination, and seawater desalination. In 2000, MWD entered an agreement with the California Department of Water Resources (DWR) to administer $45 million of Proposition 13 State bond funds for MWD's Southern California Water Supply Reliability Projects Program. MWD paired the $45 million of State funds with $35 million of MWD capital funds to develop nine groundwater storage programs in partnership with member and retail agencies and groundwater basin managers. These nine contractual storage programs have an initial 25-year term and provide for storage of up to 212 thousand acre-feet (AF) and dry-year yield of up to 70 thousand AF.[1]

(2) West Basin Municipal Water District

The WBMWD was established in 1947 to help mitigate overpumping in the West Coast Groundwater Basin, prior to its adjudication in 1961, by providing imported water to a growing population in western and southwest Los Angeles County. In the same year WBMWD became a member agency of MWD to purchase wholesale potable water from the Colorado River Aqueduct and SWP to sell to local municipalities and utilities. The WBMWD service area covers 185-square miles across 17 cities, serving approximately 900,000 customers. From 2000 to 2020, retail water demand in the WBMWD service area declined more than 25 percent although population continued to rise, indicating increased water use efficiency.[2]

WBMWD imports water, both potable surface water and recycled water, to supplement the local supplies of its members. Additionally, WBMWD injects a blend of desalinated brackish water, recycled water and imported water into the West Coast Groundwater Barrier to protect the groundwater supplies of its members from seawater intrusion. WBMWD currently imports potable water from SWP and Colorado River via Metropolitan pipelines and aqueducts and delivers 28,046 AFY of recycled water to sites inside its service area.[3] Recycled water is utilized for industrial use and landscaping irrigation.[4] Additionally, WBMWD has more than 450 customer sites for recycled water for municipal, commercial, and industrial use.

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1 *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, adopted June 2021, website: https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf. Accessed September 2023.*

2 *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

3 *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

4 *Risk Management Professionals. (2020). City of El Segundo 2020 Urban Water Management Plan. https://wuedata.water.ca.gov/getfile?filename=/public%2Fuwmp_attachments%2F7228116691%2FElSegundo.2020UWMP.FINAL.pdf.*

Ocean water desalination has been proposed as a potential future supply source in the WBMWD service area. In 2001, WBMWD began to explore the development of a new, drought-proof, locally controlled supply of drinking water. The WBMWD concluded a pilot study, demonstration facility, multiple technical studies, and most recently the certification of the Final Environmental Impact Report (EIR) in November 2019 for a full-scale facility capable of providing 21,500 AFY of desalinated water in El Segundo. A pilot study operated until 2009, desalinating approximately 20 gallons per minute. Currently, the Ocean Water Desalination Project is in an evaluation phase. The WBMWD Board outlined five conditions that staff must satisfy before the project may proceed to any subsequent phase, including: developing cost estimates, developing a financial evaluation and plan, completing a cost-benefit analysis, developing design and project delivery documents, and securing permits.[5]

(3) City of El Segundo

The City of El Segundo is situated in the Los Angeles Basin on the Pacific coast of California approximately 1.5 miles south of Los Angeles International airport. With over 50 percent of potable water used for industrial processes and 15 percent by the commercial and institutional sectors, only about a quarter of potable water is used by residential customers. Reclaimed or recycled water is used for landscape irrigation, park and school ground irrigation, industrial use, and for groundwater recharge. The City serves an estimated population of approximately 16,930[6] and, as a result of this analysis, the service area population is estimated to be 23,180 by 2045.

Today, the City is almost built-out with several redevelopment projects in various stages of planning. **Table IV.N.1-1, El Segundo Current and Projected Population,** presents the projected population used for the WSA in 5-year increments until the year 2045. The percent increase for the population growth is also shown. The WSA uses the population estimate published by the Department of Finance (DOF) for 2023 for the City of El Segundo as the baseline for the service area population. With all foreseeable future residential development included on this effort's development list, this analysis developed an updated population projection through 2045. Population projections incorporate the City's 2021-2029 Housing Element projections, which were not available at the time the City's 2020 UWMP was developed.

[5] *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

[6] *State of California, Department of Finance. (May 2023). E-4 Population Estimates for Cities, Counties, and the State, 2021-2023, with 2020 Census Benchmark. Sacramento, California. Available for download at: https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2023-with-2020-census-benchmark/.*

Table IV.N.1-1
El Segundo Current and Projected Population

	2023[1]	2025	2030	2035	2040	2045
Service Area Population[2]	16,930	18,100	21,240	23,180	23,180	**23,180**
% Average Annual Population Increase	**N/A**	**3.4%**	**3.5%**	**1.8%**	**0%**	**0%**

1. *2023 actual population is based on the City of El Segundo's State of California Department of Finance estimates as reported in Table E-4 Population Estimates for Cities, Counties, and the State, for years 2021-2023, with 2020 Census Benchmark. Published in Sacramento, California, May 2023.*
2. *Values have been rounded to the nearest ten people.*

(a) El Segundo Supply Source and Contractual Provisions

El Segundo has groundwater pumping rights to 953 AFY from the adjudicated West Coast Basin that it leases to the Golden State Water Company.[7] The City does not plan to use groundwater as a water supply and is entirely dependent on the WBMWD for its potable and recycled water.[8] WBMWD's main water supplier is MWD, which has a legal entitlement to water from the Colorado River under a permanent contract with the United States Secretary of the Interior.[9] It is one of 29 agencies with a long-term SWP contract with the Department of Water Resources, which operates the SWP.[10] The member agencies of Metropolitan (of which WBMWD is one) are not required to purchase water from MWD.[11] Yet, as imported water from MWD comprises 57 percent of WBMWD's water supply portfolio,[12] WBMWD's supply reliability is affected by MWD's ability to secure water imports. However, due to supply reliability investments on MWD's part, MWD projects to have sufficient supplies for WBMWD's projected demands in single dry and multiple dry years.[13] Additionally, WBMWD's conservation measures and diversification of supplies (through developing local recycled water supplies among other efforts), also increase its supply reliability and ability to meet projected demands.[14] West Basin does not anticipate shortages and its service area demands are assumed to be unconstrained in reliability scenarios since Metropolitan projects sufficient supplies to meet West Basin's demands in single dry year or

7 *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

8 *City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021.*

9 *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

10 *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

11 *West Basin Municipal Water District, Special Variable Rate Water Revenue Refunding Bonds 2022 Series C, July 20, 2022, website: https://bondlink-cdn.com/2089/2022_MetropolitanWaterDistrictSouthernCalifornia_SeriesC_OS.eT60sXRaN.pdf.*

12 *West Basin Municipal Water District, Imported Water Fact Sheet, July 21, 2022, website: https://www.westbasin.org/wp-content/uploads/2021/08/07-22-21-Imported-Water-Fact-Sheet.pdf.*

13 *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

14 *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

multiple dry year scenarios.[15] Similarly, WBMWD projects to be able to meet the City of El Segundo's projected demands in single dry year and multiple dry year scenarios.[16]

(b) El Segundo Emergency Connections

In addition to El Segundo's available water supply sources, there are four interconnections with three neighboring water agencies that can be activated during emergency situations: Los Angeles Department of Water and Power (LADWP), City of Manhattan Beach, and California Water Service. **Table IV.N.1-2, El Segundo Emergency Connections**, presents the City's emergency connections.

Table IV.N.1-2
El Segundo Emergency Connections

West Basin Municipal Water District		**Emergency Connections**
Connection	Capacity	LADWP (Imperial Ave. and Sheldon)
West Basin #3 MWD	40 CFS	LADWP (Imperial Highway and Nash)
West Basin #28 MWD	160 CFS	West Basin #3 Interconnection with Manhattan Beach
Total Capacity	**200 CFS**	California Water Service

CFS = Cubic Feet per Second
Source: City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021.

In a catastrophic event that prevents the City from obtaining water for distribution, WBMWD implements actions and methods to continue supplying water to customers of its member agencies. Water reserves are available to MWD through Diamond Valley Lake, as well as other surface reservoirs and it is estimated that MWD could provide a full supply for up to six months for all of its service areas following a catastrophic event. In addition, methods to ensure that water is continually supplied to customers include stockpiling emergency pipeline repair materials and coordinating with the California Governor's Office of Emergency Services (Cal OES) and the County's Operations Area in the event of a disruption in water supply.

If a major earthquake or other catastrophic incident caused a regional power outage and a natural gas line break, but the water distribution lines were still intact, the City would be able to provide water to its customers and its emergency interties (i.e. LADWP, City of Manhattan Beach, and the California Water Service Company). Water Division operations personnel can change valve positions and directly operate the water system from MWD's water pressure. The City is adequately prepared in the event of a regional power outage. In addition, to ensure the imported water supply is made available, MWD has backup generation at its facilities as well as the ability to employ gravitational flow from regional reservoirs such as Lake Mathews, Castaic Lake, and Silverwood Lake. Mobile generators are also available as needed.

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[15] *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

[16] *City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021.*

(c) El Segundo Water Supply Projections

The WBMWD has the capacity to meet the potable and recycled water demands of all its customers in wet and normal years. WBMWD reports sufficient supply reliability, including no demand or supply reduction in dry years, as compared to normal year demands and supplies.

As presented in **Table IV.N.1-3, Normal Year Supply and Demand Comparison for WBMWD,** and reported in the WBMWD 2020 UWMP, in 2025 WBMWD can provide 146,190 AFY total supply assurance to all WBMWD member agencies, meeting their normal year demand estimates as well as their multiple dry year demands. Going forward, as reported in the WBMWD 2020 UWMP, by 2045 WBMWD reports it will be able to provide 165,760 AFY total supply assurance to all WBMWD member agencies, again meeting their normal year demand estimates as well as their estimated multiple dry-year demands.[17]

Table IV.N.1-3
Normal Year Supply and Demand Comparison for WBMWD

	2025	2030	2035	2040	2045
Supply Totals	146,190	150,160	160,450	165,660	165,760
Demand Totals	146,190	150,160	160,450	165,660	165,760
Difference	**0**	**0**	**0**	**0**	**0**

Source: West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021.

(d) El Segundo Water Supply Shortage Contingency Plan

The Urban Water Management Planning Act requires all California urban water retailers supplying water to more than 3,000 customers, or supplying more than 3,000 AFY of water, to adopt a WSCP as part of the UWMP. The objective of this legislation is to prompt every water agency to plan for droughts and to prepare a series of responses based upon the severity and length of drought. Per Water Code Section 10632 (a)(3)(A), El Segundo must include six standard water shortage levels that represent shortages from the normal reliability as determined in the Annual Assessment. The shortage levels have been standardized to provide a consistent regional and statewide approach to conveying the relative severity of water supply shortage conditions. The six standard water shortage levels correspond to progressively increasing estimated shortage conditions (up to 10, 20, 30, 40, 50, and greater than 50 percent shortage compared to the normal reliability condition) and align with the response actions El Segundo would implement to meet the severity of the impending shortages.

Table IV.N.1-4, Multiple-Dry Years Supply and Demand Comparison, from WBMWD's 2020 UWMP, demonstrates the 100 percent supply availability during dry years for base years 2025 through 2045 for all WBMWD retailers, including the City of El Segundo. Refer to the El Segundo 2020 UWMP for customer category breakdowns and water shortage policies for each customer class.

[17] *West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021, website: https://www.westbasin.org/wp-content/uploads/2021/06/WBMWD-2020-UWMP_Final_2021-06-30.pdf. Accessed September 2023.*

Table IV.N.1-4
Multiple-Dry Year Supply and Demand Comparison

		2025	2030	2035	2040	2045
First Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**
Second Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**
Third Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**
Fourth Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**
Fifth Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**

Source: West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021.

(e) El Segundo Future Demand Projections

Per City direction, the WSA assumes the City's average 2018 and 2019 potable water use for baseline 2023 potable water use. This period was selected because the following three years each presented unique challenges: 2020 demand was affected by COVID-19 pandemic shut-downs and work-from-home trends; 2021 demand was affected by a sewer spill requiring supplemental potable water use in the recycled water system; and year 2022 demand was affected by drought restrictions. Using the higher average 2018 and 2019 consumption volume to establish the year 2023 baseline demand, accounts for some drought rebound. That drought rebound is expected following the lower year 2022 potable demand consumption. Due to the City's 2020 UWMP having reported 'no growth in demand,' this baseline demand assumes no growth volume through the year 2045 and assumes no adjustment due to active or passive savings; again, being consistent with what the City's 2020 UWMP reported.

The 2021-2029 Housing Element, along with all the units it includes to meet the Regional Housing Needs Assessment (RHNA) requirements, was not available at the time of the El Segundo 2020 UWMP demand projection. This WSA's demand estimate accounts for this growth and estimates net added population and demand for the Housing Element.

Recycled water consumption is based on reported use per the El Segundo 2020 UWMP.[18] This analysis assumes no change in recycled demand between 2040 and 2045; the 2020 UWMP only reports demands through the year 2040. Based on El Segundo's 2020 UWMP, it appears that recycled water supplies do not decrease in dry years as compared to normal year types.[19]

[18] *City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021, Table 4.1.9.*
[19] *City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021, Table 7.2.1.*

However, per the El Segundo 2020 UWMP service area recycled water demand is expected to decrease in normal year conditions between 2020 and 2040.

Table IV.N.1-5, Future System Demand Projections (Without Additional Development), shows the future system demand projections without additional development and the difference (excess supply allocation) until 2045. This table presents system demand projections using the estimated baseline demand, as explained previously, and assumes no growth in accounts in the El Segundo service area. As shown, available supplies are sufficient to meet system demand projections in a normal year. Per the El Segundo 2020 UWMP, the WBMWD 2020 UWMP, and additional personal communication with WBMWD and City staff, WBMWD is prepared to supply all water demands for the City; any differences in 2020 UWMP published supply volumes and City of El Segundo estimated demand represents additional water purchases from WBMWD rather than an inability to meet water demands. Therefore, the normal year supply assurance is equal to the demand value. Despite potable demand (without additional projects) remaining static at estimated baseline year 2023 levels, since total projected recycled water demand is estimated to decrease between 2020 and 2040 (according to the El Segundo 2020 UWMP), total future system demand projection (without additional development) is expected to decrease.

Table IV.N.1-5
Future System Demand Projections (Without Additional Development)

	2020	2025	2030	2035	2040	2045
Normal Year Supply Assured (AFY)	14,456	15,015	14,223	13,520	12,883	12,883
Normal Year Demand Projections (AFY)	14,456	15,015	14,223	13,520	12,883	12,883
Annual Normal Year Excess (AFY)	0	0	0	0	0	0
Percent Excess in Normal year	0%	0%	0%	0%	0%	0%

Notes:
1. *In some cases, values are rounded to the nearest single digit and totals may not align due to rounding.*
2. *2020 demand is based on actual potable and recycled water use as reported in the 2020 UWMP.*
3. *2025 through 2045 potable demand assumes 2018 and 2019 average imported water (demand) represents annual start year 2023 potable water use. Potable water use assumes no growth in baseline demand and no active nor passive savings; this is consistent with what the 2020 UWMP reported. Recycled water projections are based on 2020 UWMP Table 4.1.9: Total Water Demands recycled water estimates. Assumes no change in baseline potable demand from 2023 to 2045; and no change in recycled demand between 2040 and 2045.*
4. *Normal year supply with no additional projects will equal the normal year demand with no additional projects. There will be no excess/surplus or shortfall per WBMWD direction.*

(f) El Segundo Water Demand Management

Though not included in baseline demand projections as explained previously, it is anticipated that the El Segundo service area will attain passive savings naturally over the projection period and achieve active conservation savings on an ongoing basis and as needed in dry years as part of its water conservation initiatives.

Passive savings refers to water savings resulting from actions and activities that do not depend on direct financial assistance or educational programs implemented by water suppliers. In **Table IV.N.1-5, Future System Demand Projections (Without Additional Development)**, there were no new developments assumed, so any water savings will be primarily from the natural replacement of existing plumbing fixtures with water-efficient models required under current plumbing code standards, the installation of water-efficient fixtures and equipment retrofits in

existing buildings as required under CALGreen Building Code Standards, and inclusion of low-water use landscaping and high-efficiency irrigation systems to minimize outdoor water use in new connections and developments in accordance with the state's Model Water Efficient Landscape Ordinance (MWELO). Active savings refers to the savings that result from implementing conservation measures. El Segundo's active conservation measures, as reported on their website as of July 2023, are presented in **Table IV.N.1-6, El Segundo Water Demand Management Measures**. The City is a partner with the WBMWD and is part of the MWD Water Use Efficiency Programs. In an effort to help Californians conserve water, the WBMWD is offering a number of water conservation rebates that are eligible for City of El Segundo customer participation.

Table IV.N.1-6
El Segundo Water Demand Management Measures

Measure Name	Description
Grass Replacement Rebates[1]	A rebate of $3 per square foot of grass removed from residential and commercial landscapes is currently offered.
Public Agency: Grass Replacement Rebate[1]	Rebates starting at $4 per square foot are available for public agencies in the service area to remove non-essential grass on public property.
Grass Replacement +[1]	The Grass Replacement + program offers residents in priority, eligible neighborhoods a free custom landscape design, a free drought-tolerant tree and additional assistance in applying for a rebate of $5 for every square foot of grass replaced with a drought-friendly garden.
Grass Removal and Garden Transformation Workshops[1]	These BeWaterWise.com workshops are offered multiple times per month to teach residents how to transform heavy-water-using grass lawns into climate-appropriate water efficient gardens.
Rain Barrels[1]	Free rain barrels are available to service area residents to capture rain, prevent runoff, reduce water use, and satisfy the stormwater capture requirement for the grass replacement rebate program.
SoCal Gas Partner Program[1]	Southern California Gas Co. is partnering with WBMWD to offer $150,000 in water and energy efficiency upgrades at no cost for 100 eligible families within priority communities (including the El Segundo service area).
Commercial Sector Water Use Efficiency[1]	In 2023 WBMWD began a new CII water-efficiency program that meets the specific needs of the service area, reduces demand, and helps El Segundo meet CA state performance measures.
Water Waste Ordinances[2]	The City adopted water conservation measures by Ordinance Numbers 1433 and 1437. Ordinance No. 1433 added enforcement actions to the formerly adopted ordinance and was adopted on November 3, 2009. Ordinance No. 1437 addresses water conservation in landscaping and was adopted on December 15, 2009. To enforce these two ordinances, the City will issue warnings and subsequent citations to customers exceeding the conservation constraints.
Conservation Pricing[2]	The City has a tiered rate structure in place to encourage water conservation. Additionally, the City has a service charge that is calculated by meter size and usage for all customer sectors, billed either monthly or bi-monthly. The tiered water rates were updated in the 2004 Ordinance 1376, which also states that potable water consumption charges will be increased by the same percentage as WBMWD increases its charges to the City.
Public Education & Outreach[2]	The City utilizes several methods to promote water conservation and resource efficiency including bill inserts, newsletters, brochures, demonstration gardens, special events, media outreach, events, programs to coordinate with other government agencies, and coordination with industry and public interest groups and media.

Table IV.N.1-6
El Segundo Water Demand Management Measures

Measure Name	Description
Water Loss Management[2]	On average, City Water Division crews survey approximately 60 miles of main and lateral pipelines per year. Line replacements are made based on a number of factors: a history of leaks in a particular line over a number of years; flow, or lack thereof, as calculated by flow testing the line; and sizing. If a leak is detected, City Water Division personnel repair the leak in a timely manner.
Water Conservation Coordination & Staffing Support[2]	The City's water conservation coordinator is a function performed mainly by the Water Supervisor, who maintains American Water Works Association (AWWA) conservation certification, working in conjunction with WBMWD. The conservation coordinator also implements residential water audits at the request of customers.

1. *El Segundo and West Basin Water Conservation Rebate Programs webpages, accessed July 2023: https://www.westbasin.org/conservation-3/.*
2. *Risk Management Professionals 2020 Urban Water Management Plan for City of El Segundo, 9 Demand Management Measures.*

b) Water Infrastructure

As shown in **Figure IV.N.1-1, Water Supply Map**, the Specific Plan area is serviced by both potable and non-potable water. Potable water is drinking water that comes from surface water and groundwater sources and is treated to levels that meet State and federal standards for consumption and non-potable water (recycled water), which is not suitable for public consumption, is typically used for landscape irrigation. Water for fire suppression is provided by on-site building sprinklers and from off-site fire hydrants.

3. Relevant Plans, Policies, and Ordinances

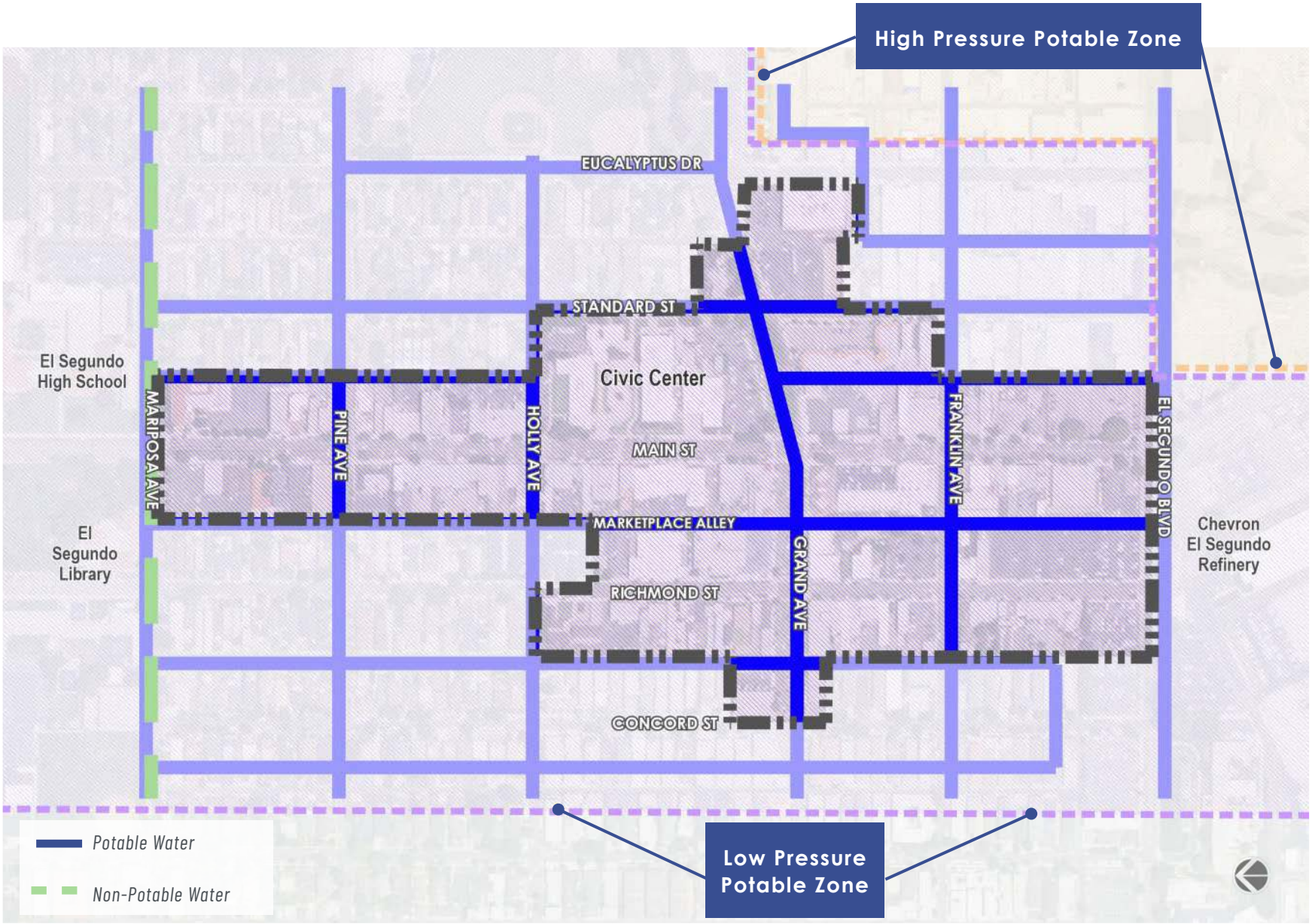
a) Federal

There are no relevant federal laws for water supply and services.

b) State

(1) California Urban Water Management Act

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers to develop UWMPs every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 acre feet per year (af/y) of water to customers.



Source: El Segundo Downtown Specific Plan, Public Review Draft, May 2023.

Figure IV.N.1-1
Water Supply Map

(2) Senate Bill 610, Senate Bill 221, and Senate Bill 7

Two of the state laws addressing the assessment of water supply necessary to serve large-scale development projects, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in Water Code Sections 10910-10915, specifies the requirements for water supply assessments (WSAs) and their role in the California Environmental Quality Act (CEQA) process, and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- Commercial office buildings of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- Hotel or motels, or both, having more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- Mixed-use projects that falls in one or more of the above-identified categories; or
- A project not falling in one of the above-identified categories but that would demand water equal or greater to a 500 dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a).)

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past 5 years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

SB 221 also addresses water supply in the land use approval process for large residential subdivision projects. However, unlike SB 610 WSAs, which are prepared at the beginning of a planning process, SB 221-required Water Supply Verification (WSV) is prepared at the end of the planning process for such projects. Under SB 221, a water supplier must prepare and adopt a WSV indicating sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to completion of a project, as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. However, Government Code Section 66473.7(i) exempts "…any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households."

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[20] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

(3) Senate Bill X7-7 – Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[21] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[22] Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.[23]

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[20] *California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010, website: https://www.waterboards.ca.gov/water_issues/hot_topics/20x2020/docs/20x2020plan.pdf. Accessed September 2023.*

[21] *State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, updated April 4, 2017.*

[22] *State Water Resources Control Board, Media Release, "Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life," April 4, 2017.*

[23] *State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, updated October 3, 2017.*

(4) California Code of Regulations

(a) Title 20

Title 20, Section 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures such as showerheads, lavatory faucets and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018 is 1.8 gpm at 80 psi; and lavatory faucets manufactured after July 1, 2016 is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016 is 1.28 gallons per flush.[24]

(b) CALGreen Code

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The mandatory measures for water conservation provide limits for fixture flow rates, which are the same as those for the Title 20 efficiency standards listed above. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

(c) Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2019 California Plumbing Code, which is based on the 2018 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2019.

(5) Executive Order B-40-17

On April 7, 2017, Executive Order B-40-17 was issued. Cities and water districts throughout the state are required to report their water use each month and bans wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

[24] *California Code of Regulations, Title 20, Section 1605.3(h), website: https://govt.westlaw.com/calregs/Document/I02CB6DB0EB2F11ED8BFF9413895FDA56?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default). Accessed September 2023.*

(6) Executive Order N-10-21

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth On July 8, 2021 Executive Order N-10-21 (Order) was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. The Order lists commonsense measures Californians can undertake to achieve water usage reduction goals and identifies the State Water Resources Control Board (Water Board) for tracking of monthly reporting on the State's progress.

c) Regional and Local

(1) Metropolitan Water District

As discussed in detail below, the Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and ultimate customers, MWD has adopted a series of official reports on the state of its water supplies. As described in further detail below, in response to recent developments in the Sacramento Delta, the MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, including the City of El Segundo.

(2) 2020 Urban Water Management Plan

The Metropolitan Water District's (MWD) 2020 UWMP (MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.[25] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions, i.e. under the most challenging weather conditions such as drought and service interruptions caused by natural disasters, is presented in Table 2-5 of the 2020 MWD UWMP.[26] The analysis in the 2020 MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[27] In the 2020 MWD UWMP, the projected 2045 demand water during multiple-dry year conditions is 1,564,000 AFY, whereas the expected and projected 2045 supply is 2,239,000 AFY based on current programs, for a potential surplus in 2045 of 675,000 AFY.[28]

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[25] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, adopted June 2021, website: https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf. Accessed September 2023.*

[26] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, adopted June 2021, website: https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf. Accessed September 2023.*

[27] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, adopted June 2021, website: https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf. Accessed September 2023.*

[28] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, adopted June 2021, website: https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf. Accessed September 2023.*

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.

(3) 2015 Integrated Resources Plan

MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply, such as water quality, climate change, and regulatory and operational changes. The most current IRP (2015 IRP) was adopted in January 2016.[29] It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2015 IRP reliability targets identify developments in imported and local water supply and in water conservation that, if successful, would provide a future without water shortages and mandatory restrictions under planned conditions. For imported supplies, MWD would make investments to maximize Colorado River Aqueduct deliveries in dry years. MWD would make ecologically-sound infrastructure investments to the SWP so that the water system can capture sufficient supplies to help meet average year demands and to refill the MWD storage network in above-average and wet years.

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after

[29] *Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2015 Update, Report No. 1518, January 2016.*

conservation is estimated to be 4,273,000 af and the total supply reliability target is approximately 4,539,000 af, representing an excess of 266,000 af.[30]

The 2020 IRP planning process is currently in development.[31] The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges. These four scenarios include (A) low demand, stable imports; (B) high demand, stable imports; (C) low demand, reduced imports; and (D) high demand, reduced imports.[32,33]

(4) Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[34]

(5) Long-Term Conservation Plan

The Long-Term Conservation Plan (LTCP) provides a framework of goals and strategies to reduce per capita water use through conservation and water use efficiency. The plan recognizes the challenges and uncertainties to achieving the IRP target. As a result, the LTCP uses adaptive management and strategies to adjust implementation approaches.

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30 *Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2015 Update, Report No. 1518, January 2016.*

31 *Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2020.*

32 *Metropolitan Water District of Southern California, Preliminary Gap Analysis of the 2020 Integrated Resources Plan, December 15, 2020. Low demand = slow economic growth; stable imports = gradual climate change and low regulatory impacts; high demand = high economic growth; and reduced imports = severe climate impacts and high regulatory impacts.*

33 *Preliminary Gap Analysis of the 2020 Integrated Resources Plan, https://www.mwdh2o.com/media/17999/12152020-irp-6b-presentation.pdf. Accessed December 21, 2022.*

34 *Metropolitan Water District of Southern California, Water Surplus and Drought Management Plan: Report No. 1150, August, 1999, website: https://www.mwdh2o.com/media/20239/24_water_supply_drought_management_plan.pdf. Accessed September 2023.*

(6) Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the *Water Supply Allocation Plan* (WSAP). The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[35] The allocation period covers 12 consecutive months from July of a given year through the following June.

(7) City of El Segundo General Plan

The policies outlined in the City of El Segundo General Plan Land Use Element and Conservation Element are considered relevant to the Project, as described below:[36]

Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.

Policy CN2-5: Require new construction and development to install water-conserving fixtures and appliances to reduce the amount of new demand.

Policy CN2-7: Require new construction and development to incorporate the principles and practices of sound landscape design and management, particularly those conserving water and energy.

Policy CN2-8: Encourage the retrofitting of existing landscapes to incorporate the principles and practices of sound

[35] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, adopted June 2021, website: https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf. Accessed September 2023.*

[36] *City of El Segundo, City of El Segundo General Plan, Chapter 7, Conservation Element. Adopted December 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=370. Accessed September 2023 and City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed September 2023.*

landscape design and management, particularly those conserving water and energy.

(8) City of El Segundo Municipal Code

Chapter 15-15A of the El Segundo Municipal Code ensures compliance with California law and promoting water conservation and is referred to as the Water Conservation In Landscaping Standards. The Water Conservation In Landscaping Standards are intended to promote water conservation while allowing the maximum possible flexibility in designing healthy, attractive, and cost effective water efficient landscapes.

(9) Proposed Specific Plan

The Specific Plan Update provides direction for development through regulatory tools and guidelines established to shape the design character envisioned by the community. Based on community input, planning principles shape the guidelines and standards contained in the Specific Plan Update. Planning principles that are implemented through land use and development standards for each district are set forth in the Specific Plan Update. Planning principles that are relevant to water are listed below:

Public Realm – Placemaking and Beautification

- **E. Landscaping** – Landscaping should be layered with a variety of shapes, textures, and colors and utilize drought-tolerant and California native plants to reduce irrigation and conserve water. Landscaping provisions of ESMC Chapter 15A in regards to water conservation should be met, such as 15-15A-5, landscape documentation package and water efficient planting and irrigation requirements.
- **E.1. Street and Median Tree Planting** – Species should be hardy and not easily affected by extreme temperatures, wind, water supply, or handling.
- **E.2. Sidewalk Parkway and Median Shrub Planting** – Choose species that are hardy and not easily affected by extreme temperatures, wind, water supply, or handling.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate the project impacts to utilities and service systems are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to utilities and service systems would occur if the project would:

Threshold (a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; and***

Threshold (b): ***Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.***

b) Analysis of Project Impacts

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

(1) Construction

Water demand for construction within the Specific Plan area would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction. Overall, estimated construction-period demand is significantly less than overall estimated operational demand, which, as described below, can be accommodated by the existing infrastructure. Accordingly, the existing water infrastructure would similarly meet the limited and temporary water demand associated with maximum buildout of the Specific Plan area such that no new or expanded water facilities would need to be constructed to meet construction demands.

Implementation of future development within the Specific Plan area could require construction of new, on-site water distribution lines to serve new development. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public mains. Prior to ground disturbance, Project contractors would coordinate with WBMWD to identify the locations and depth of all lines. Further, WBMWD would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, buildout of the Specific Plan area would not require or result in the relocation or construction of new water facilities or the expansion of existing facilities that could cause a significant environmental effects and the impact would be less than significant and no mitigation would be required.

(2) Operation

Implementation of future development within the Specific Plan area would increase the average and peak daily water usage for the Project area. As previously shown in **Figure IV.N.1-1, Water Supply Map**, the Specific Plan area is serviced by both potable and non-potable water. Potable water is drinking water that comes from surface water and groundwater sources and is treated to levels that meet State and federal standards for consumption and non-potable water (recycled water), which is not suitable for public consumption, is typically used for landscape irrigation.

When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater

instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. The required fire flow requirements from the City of El Segundo can range from 1,500 gallons per minute (gpm) up to 8,000 gpm, depending on the type of construction build and would comply with the 2022 California Fire Code, Appendix B. A minimum residual water pressure of 20 pounds per square inch (psi) flowing from a minimum of two hydrants flowing simultaneously is also required.[37] The final fire flow required for future development within the Specific Plan area would be established by the ESFD during its review of plot plans, prior to the issuance of a building permits by the City. The plot plans would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of plot plans, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for future development.

The water service connection for domestic water and fire protection would be made to one or more of the existing water lines surrounding each development area. The specific location of these connections and pipe sizing would be based upon WBMWD's approval. The system would provide adequate water supply for operation of a future development's domestic requirements, automatic sprinkler systems and on-site fire hydrants, if required by the State or City Fire Marshal.

In accordance with El Segundo Fire Department Regulation H-2-a, design of the Project would include installation of private fire hydrants for buildings or structures where any portion of the building is more than 150 feet from the street or public right-of-way. The location and water pressure available to these hydrants would comply with City requirements and their installation would be conducted in coordination and under the approval of the ESFD. In addition, all water service meters, connections, and devices would be upgraded to current City Water Division standards and all necessary permits and licenses would be obtained. The City of El Segundo Public Works Department requires that plans for such water system upgrades be submitted for review and approval. Further, a Utility Plan showing existing and proposed utility improvements would be submitted to the City of El Segundo Public Works Department for review and approval. These plan checks and consultations would ensure that available water supply and pressure would be sufficient to serve the Project requirements. Therefore, operation of the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects and the impact would be less than significant and no mitigation would be required.

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

(1) Construction

Water would be required to accommodate Project construction activities, such as soil watering for compacting and fugitive dust control, masonry, painting, clean-up, and other related activities. Water use during construction would vary depending on the portions of the Project being

[37] *California Code of Regulations, Title 24, Part 9, California Building Standards Commission, 2022 California Fire Code.*

constructed and the stage of the construction activities (e.g., excavation, grading, etc.) at any one time. As required by the City's Water Conservation Ordinance (Ordinance No. 1433), non-potable water would be used for soil compacting and dust control purposes and would represent the majority of the water used during construction. While Project construction activities would create a demand for some non-potable (recycled) water, construction activities would be temporary such that any associated water use would be temporary, and the construction activities requiring water use would not create substantial water demand. Therefore, Project construction activities would generate minimal potable water demand, and would not require water supplies that could not be met by existing City water entitlements and resources. Accordingly, impacts related to water demand during construction would be less than significant and no mitigation would be required.

(2) Operation

(a) Nonresidential Demand Factors

For nonresidential development in the El Segundo service area, with projected demands not already estimated in an adopted EIR, demand factors from the Castaic Lake Water Agency (CLWA) Santa Clarita Valley (SCV) Commercial Demand Factor Study were used.[38] The SCV Commercial Demand Factor Study assessed CII water use demand factors used by other utilities and streamlined and/or averaged values presented in other more regional comprehensive studies including: City of Redwood City, City of Mountain View, City of San Bernardino Municipal Water Department, City of Santa Barbara, City of West Hollywood, Marina Coast Water District, Napa Sanitation District, Santa Clarita Valley Sanitation District, and the American Water Works Association's (AWWA) Commercial and Institutional End Uses of Water Study, which itself is based on data obtained from Irvine Ranch Water District, San Diego Water, Santa Monica Water Department, Phoenix Water Services, Los Angeles Department of Water and Power, San Diego County Water Authority, and Metropolitan Water District of Southern California.[39] The SCV Commercial Demand Factor Study also analyzed five years of water use data for approximately 500 active SCV service area commercial accounts against their building square footages and more specific land use and water use categories.

These nonresidential demand factors recommended in the SCV Commercial Demand Factor Study were multiplied by El Segundo's various planned estimated areas of matching proposed uses to yield a projected demand estimate. The nonresidential demand factors used to calculate projected demand for applicable project end uses are listed as follows:

- Retail space - 40.54 gallons per year per square foot (gpy/sqft)
- Office space - 38.72 gpy/sqft
- Medical office space - 39.45 gpy/sqft
- Sit-down restaurant space - 250.93 gpy/sqft

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[38] *SCV Demand Study Update: Land-Use Based Demand Forecast Analysis, March 4, 2016, website: https://www.yourscvwater.com/sites/default/files/SCVWA/your-water/watershed-planning/water-supply-assessments/MWM-2016_SCV-Demand-Study-Update_Land-Use-Based-Demand-Forecast_Tech-Memo-2.pdf.*

[39] *Water Research Foundation, Commercial End Uses of Water, January 1, 2000, website: https://www.waterrf.org/resource/commercial-and-institutional-end-uses-water-0.*

- Fast-food space - 349.18 gpy/sqft

(b) Residential Demand Factors

For residential development demand estimates not included in previously adopted EIRs, people per household (PPH) and indoor water use estimates were employed. An average household size of 2.535 people was assumed for all residential units, except the smaller accessory dwelling units (ADUs), which assumed 1.5 PPH. This value is based on the average household size of renter-occupied and owner-occupied units in El Segundo per the U.S. Census Bureau's Five-Year American Community Survey 2020 estimate. Net added population was calculated using the 2.535 people per household factor against the estimated net added number of residential units and then multiplied by an indoor water use factor of 42 gallons per capita per day (GPCD) to yield net water demand for residential development. This residential indoor demand factor assumes that residential units will be built to the current amended SB 1157 and joint Department of Water Resources and State Water Resources Control Board's year 2030 indoor water use recommendation of 42 GPCD. Residential outdoor water use was estimated based on the area and types of plantings planned for each development site. The outdoor use water demand projection was based on local climate factors with an average regional reference evapotranspiration (ETo) of 48 inches per year based on Santa Monica CIMIS station 99.[40] For turf, an irrigation efficiency factor of 65 percent and a plant factor of 0.7 was assumed. For drought adapted plants, an irrigation efficiency factor of 85 percent and a plant factor of 0.4 was assumed. For native plants, an irrigation efficiency factor of 85 percent and a plant factor of 0.1 was assumed. The evapotranspiration rate provides the number of inches of water needed to irrigate each planting type in inches of water per year. For each type of planting, the evapotranspiration rate was multiplied by the square footage of plantings and the irrigation efficiency factor to get total estimated water use for that type of planting. The water demands for the different types of plantings (for a project site) were added to derive a total water demand for the landscaping area specific to each development project.

(c) Project Demand Factors

The Project would result in an additional 65,000 square feet of retail space, 65,000 square feet of restaurant space, 200,000 square feet of office space, 24,000 square feet of medical office space, and 300 multi-family residential units. It is expected that the Project would be 50 percent built and online between 2025 and 2029 and 100 percent built and online between 2030 and 2035. There was no demolition to account for in calculating net added water demand for this Project based on the information provided by El Segundo staff. Additionally, from stipulations in the draft Specific Plan, there would be 3,357 square feet of landscaping in the Specific Plan area. The landscape area was estimated to be 25 percent turf area, 50 percent drought adapted plants, and 25 percent native plants. The water demand projections for the different uses stated above, ranging from retail space to landscaping area, were calculated using the demand factors and assumptions previously discussed. A projected total net water demand of 121 AFY is estimated for the Project.

[40] *California Irrigation Management Information System, CIMIS Overview, website: cimis.water.ca.gov/. Accessed June 2023.*

As shown in **Table IV.N.1-7, Normal Year Demand for WBMWD**, the 2020 UWMP provides water demand projections in five-year increments through 2045. Future development in the Specific Plan area has an estimated consumption of 121 AFY. This would represent 0.08 for 2025, 2030, and 2035, and 0.07 percent for 2040 and 2045 of the projected demands for these years, respectively. Therefore, there would not be a significant increase in water demand. WBMWD is also projected to improve its supplies and supply reliability by increasing recycled water supplies as well as investing in desalinated ocean water supply and as discussed, surplus supplies are available to meet the increased demands during normal, dry, and multiple dry year scenarios through 2044. In addition, the above water demand estimates for the Project are conservative because they do not take into account future water conservation requirements (such as the SB x7-7), and the Project would comply with the water efficiency standards of Title 24 of the CCR and the City's UWMP, General Plan, and ESMC.

Table IV.N.1-7
Normal Year Demand for WBMWD

	2025	2030	2035	2040	2045
Demand Totals	146,190	150,160	160,450	165,660	165,760
Source: West Basin Municipal Water District, 2020 Urban Water Management Plan, adopted May 2021.					

Based on the above, the City would be able to meet Project operational water demand while meeting its existing and planned projected future water demands through at least 2040, and would not require new City water entitlements or resources. Therefore, Project operational water supply impacts would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

a) Water Supply

(1) Related Projects

The geographic context for the cumulative impact analysis on water supply is the Specific Plan area. As detailed in **Section II, Environmental Setting**, there are 13 related projects. With respect to cumulative water supply impacts, the Project-specific analysis presented above also represents the cumulative analysis because it considers water demand and supply within the whole of the City through the 2045 planning horizon of the 2020 UWMP. Furthermore, those related projects that meet the SB 610 criteria for requiring the preparation of a WSA would have WSAs prepared to demonstrate that adequate water supply is available to serve them, and only those related projects where their WSA's conclude that adequate water is available would be approved. The types of projects that are subject to the requirements of Senate Bill 610 tend to be larger projects that may or may not have been included within the growth projections of the 2020 UWMP.

The WSA includes an analysis of every foreseeable future development project in the El Segundo service area and each project's net added water demand (see **Table IV.N.1-8 Projected Annual Net New Demands (AFY))**. Net demand takes into account existing site water

use including buildings that would be demolished and/or landscapes that would be converted. An estimated total system water loss is then apportioned to the resulting net demand volume from the new development.

Table IV.N.1-8
Projected Annual Net New Demands (AFY)

Development Project	2025	2030	2035	2040	2045
Housing Element	57	171	228	228	228
Downtown Specific Plan Update	0	61	121	121	121
Pacific Coast Commons Specific Plan	0	55	55	55	55
South Campus (Raytheon) Specific Plan	64	253	441	441	441
Stick n Stein Mixed Use	0	8	8	8	8
201-209 Richmond St	0	2	2	2	2
Beach Cities Media Campus Office Campus	0	59	59	59	59
650-700 N PCH Office	0	16	16	16	16
1950-1960 E Grand Ave Office Project	0	17	17	17	17
Smoky Hollow Specific Plan (partial)	1	15	63	110	110
140 Oregon Office Addition	7	7	7	7	7
141 Eucalyptus Dr Office	0	1	1	1	1
445 N. Douglas – Data Center Phase 2	0	33	33	33	33
2200 Grand Parking Structure & Offices	0	2	2	2	2
Subtotal Developments	**129**	**700**	**1,053**	**1,100**	**1,100**
Estimated System Water Loss	5	28	42	44	44
Grand Total Net New Development Demand	**134**	**728**	**1,095**	**1,144**	**1,144**

Notes: Net demand includes potable and recycled water demands.

Total system water loss is the sum of apparent and real losses. Apparent loss is associated with metering inaccuracies, billing, and administrative errors, authorized unmetered uses (e.g., system flushing and firefighting), and unauthorized uses. Real loss is associated with physical water lost through line breaks, leaks and seeps, and overflows of storage tanks. The non-revenue water values provided in El Segundo's American Water Works Association (AWWA) validated water loss audits for years 2020 and 2021 are below the technical minimums of approximately 6 percent to 7 percent.[41] From the AWWA water loss audits it appears that real water loss is approximately 1 percent to 2 percent less than non-revenue water in El Segundo. Considering these factors, the WSA applies an additional estimated system water loss of 4 percent. As of November 2023, it is estimated that approximately 2 percent of total service area net added demand by the year 2045 would be served by recycled water.

Table IV.N.1-9, Projected Total System Demand with Development Projects, presents total system demand projected for El Segundo during normal conditions compared to El Segundo's supply assurances. Per the El Segundo 2020 UWMP, the WBMWD 2020 UWMP and personal communication with WBMWD and City staff, WBMWD is prepared to provide all sufficient potable and recycled water supplies to meet water demands for El Segundo. Any differences in published

[41] *SCV Demand Study Update: Land-Use Based Demand Forecast Analysis, March 4, 2016, website: https://www.yourscvwater.com/sites/default/files/SCVWA/your-water/watershed-planning/water-supply-assessments/MWM-2016_SCV-Demand-Study-Update_Land-Use-Based-Demand-Forecast_Tech-Memo-2.pdf.*

supply volumes and projected demands demonstrate additional water purchases from WBMWD given their supply reliability (rather than an inability of the City to meet water demands). Therefore, in the WSA the maximum supply allocation is equal to the demand, including proposed project demands with no projected surplus in the demand without added projects scenario. The total system demand is calculated by adding the net development demand from **Table IV.N.1-9 Projected Total System Demand with Development Projects,** to the system demand projections from **Table IV.N.1-5, Future System Demand Projections (Without Additional Development)**. Net new demand from development projects takes into consideration an apportioned total system water loss, as noted in **Table IV.N.1-9, Projected Total System Demand with Development Projects**. As explained previously, despite potable demand (without additional projects) remaining static at estimated baseline year 2023 levels, since total projected recycled water demand is estimated to decrease between 2020 and 2040 (according to the El Segundo 2020 UWMP), total future system demand projection (even with additional development projects) is expected to decrease between 2025 and 2040.

Table IV.N.1-9
Projected Total System Demand with Development Projects

Total System Demand, No Drought[1]	2020[2]	2025	2030	2035	2040	2045
Normal Year Demand Projection for El Segundo (AFY)[3]	14,456	15,015	14,223	13,520	12,883	12,883
Net New Demand from Development Projects (AFY)	-	134	728	1,095	1,144	1,144
Total System Demand (AFY)	14,456	15,149	14,951	14,615	14,027	14,027
WBMWD Supply Assurance (AFY)[4]	14,456	15,149	14,951	14,615	14,027	14,027
Estimated Remaining WBMWD Supply (AFY)[4]	0	0	0	0	0	0
Est. Remaining Supply Reliability %[4]	0%	0%	0%	0%	0%	0%

Notes:
1. *In some cases, values are rounded to the nearest single digit and totals may not align due to rounding.*
2. *2020 demand is based on actual potable and recycled water use as reported in the 2020 UWMP.*
3. *2025 through 2045 potable demand assumes 2018 and 2019 average imported water (demand) represents annual start year 2023 potable water use. Potable water use assumes no growth in baseline demand and no active nor passive savings; this is consistent with what the 2020 UWMP reported. Recycled water projections are based on 2020 UWMP Table 4.1.9: Total Water Demands recycled water estimates. Assumes no change in baseline potable demand from 2023 to 2045; and no change in recycled demand between 2040 and 2045.*
4. *Normal year supplies will equal the normal year demand with and without additional projects. There will be no excess or surplus supplies nor shortfalls.*

There will continue to be sufficient supplies to meet all projected demand, including the additional demand generated from the proposed developments, in non-drought (normal), single dry and multiple dry water year conditions until year 2045 (refer to Table 8 of the WSA, found in **Appendix K**, of this Draft EIR). In conclusion, the existing and planned future uses evaluated in the WSA would generate a net new combined potable and recycled water demand of 1,043 AFY by year 2045. In conclusion, the existing and planned future uses evaluated in the WSA would generate a net new combined potable and recycled water demand of 1,144 AFY by year 2045. This net new demand was calculated from a baseline 2023 El Segundo service area water demand. The combined potable and recycled water demand associated with the numerous aforementioned listed projects including the Project and Housing Element, and the existing and future uses evaluated in the WSA would be accommodated by El Segundo's existing supplies during normal,

single dry and multiple dry water years within a 20-year projection. Further, the estimates of water demand for the Project contained in this section are conservative because they do not account for increases in Project water conservation required by SB x7-7 and other existing and future legislation through year 2040.

(2) Conclusion

Compliance of the Project and future development projects with regulatory requirements that promote water conservation such as the ESMC, Ordinance No. 1433, and the WSCP, would also assist in assuring that adequate water supply is available on a cumulative basis. Based on the related project list and projections provided in adopted plans (e.g., the City UWMP and the WBMWD UWMP), it is anticipated that WBMWD would be able to meet the water demands of the Project and future growth through 2040 and beyond. The WBMWD UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2045. Accordingly, the Project's incremental increase in water demand would not contribute to a cumulatively significant impact and no mitigation would be required.

b) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the water infrastructure that would serve both the Project and specific related projects). The Project area and the cumulative project would incrementally increase the amount of water that is being consumed in the area. As discussed above, future development within the Specific Plan area would conduct an analysis of existing and planned capacity and determine if adequate capacity exists to serve the development. Similar to future development in the Specific Plan area, the capacity of water lines associated with cumulative project development would be determined on a project-specific basis. In the event that water line upgrades are required due to cumulative projects, all construction work within the City public rights-of-way would be subject to local municipal code and applicable agency requirements, and would be subject to CEQA review accordingly and points of connection would be based on the WBMWD's input. Furthermore, City's Public Works Department conducts ongoing evaluations to ensure that water infrastructure in the City is adequate, and undertakes infrastructure system improvements when required. Therefore, cumulative impacts on the water infrastructure system would be less than significant and no mitigation would be required.

6. Mitigation Measures

Project-level and cumulative impacts with regard to water services would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to water services would be less than significant.

8. References

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IV. Environmental Impact Analysis

N. Utilities and Service Systems

2. Wastewater

1. Introduction

This section describes the potential impacts on wastewater collection and treatment facilities and infrastructure, including whether such existing infrastructure has sufficient capacity to serve the El Segundo Downtown Specific Plan Update (Project), and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Sources consulted are listed in **Section IV.N.2.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Wastewater Infrastructure

Sewer service is provided by the City and the Los Angeles County Sanitation District. All existing sanitary sewer lines in the streets surrounding the Project area are owned by the City and the Public Works Wastewater Division provides routine maintenance in compliance with the Sanitary Sewer Master Plan. The City's existing wastewater collection system is made up of a network of gravity sewers and nine sewer pump stations. There are eight (8), ten (10), and twelve (12) inch diameter mains, primarily beneath Standard Street and Grand Avenue, within the Specific Plan area's public streets and alleys, except for the 300 through 400 blocks of Main Street, 100 to 200 blocks of Grand Avenue, and 100 through 200 blocks of Richmond Street. These blocks are serviced by mains located within the alleys.

b) Wastewater Treatment

Sewer flows originating from the Specific Plan area are collected and conveyed through a network of sewer lines for treatment at the Hyperion Water Reclamation Plant (HWRP). The main purpose of this treatment facility is to remove potential pollutants from sewage in order to protect river and marine environments and public health. The HWRP is part of a joint outfall system commonly known as the Hyperion Sanitary Sewer System, which consists of the wastewater collection system, the HWRP, and two upstream wastewater treatment plants: Donald C. Tillman Water

Reclamation Plant, Los Angeles–Glendale Water Reclamation Plant, and their associated outfalls. The HWRP treatment system collects, treats, and disposes of sewage from the entire City (except the Wilmington-San Pedro area, the strip north of San Pedro, and Watts) and from a number of cities and agencies under contractual agreements. Approximately 85 percent of the sewage and commercial/industrial wastewater comes from the City of Los Angeles. The remaining 15 percent comes from the contract cities and agencies. The existing treatment capacity of the Hyperion Sanitary Sewer System is presented in **Table IV.N.2-1, Existing Capacity of Hyperion Sanitary Sewer System,** and discussed further below.

Table IV.N.2-1
Existing Capacity of Hyperion Sanitary Sewer System

	Design Capacity (mgd)
Hyperion Water Reclamation Plant [a]	450
Donald C. Tillman Water Reclamation Plant [b]	80
Los Angeles—Glendale Water Reclamation Plant [c]	20
Total	**550**

mgd = million gallons per day

a Source: City of Los Angeles, LASAN, Hyperion Water Reclamation Plan Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp. Accessed August 2023.

b Source: City of Los Angeles, LASAN, Donald C. Tillman Water Reclamation Plant Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp. Accessed August 2023.

c Source City of Los Angeles, LASAN, Los Angeles—Glendale Water Reclamation Plant Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp. Accessed August 2023.

(1) Hyperion Sanitary Sewer System

As shown in **Table IV.N.2-1, Existing Capacity of Hyperion Sanitary Sewer System,** the existing design capacity of the Hyperion Sanitary Sewer System is approximately 550 mgd (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant). Based on the One Water LA 2040 Plan—Wastewater Facilities Plan, the average wastewater flow rate in the Hyperion Sanitary Sewer System was 314 mgd in 2016 (consisting of 250 mgd at the HWRP, 47 mgd at the Donald C. Tillman Water Reclamation Plant, and 17 mgd at the Los Angeles—Glendale Water Reclamation Plant).[1] As such, current flows are below the design capacity of approximately 550 mgd for the Hyperion Sanitary Sewer System.

(2) Hyperion Water Reclamation Plant

As discussed above, wastewater generated from the Project area is conveyed via the local collector sanitary sewer system directly to the HWRP for treatment. Wastewater generated to the

[1] *City of Los Angeles, LASAN, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan, April 2018, page 59.*

west of PCH, including the Project Site, drains to the Los Angeles Department of Water and Power HWRP. The HWRP is located west of the City and south of the Los Angeles International Airport.

Wastewater conveyed into the HWRP initially passes through screens and basins to remove coarse debris and grit. Primary treatment consisting of a physical separation process is then conducted where solids settle to the bottom of tanks while oil and grease float to the surface. These solids (called sludge) are collected, treated, and recycled. The liquid portion that remains (called primary effluent) is treated through a secondary treatment using a natural biological process. Living microorganisms are added to the primary effluent to consume organic constituents. These microorganisms are later harvested and removed as sludge.[2] After secondary treatment is completed, the treated effluent is conveyed approximately five miles offshore at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.[3] The discharge from the Hyperion Treatment Plant into Santa Monica Bay is regulated by the HWRP's National Pollutant Discharge Elimination System Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use.[4] Accordingly, the HWRP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed water quality standards. The Public Works Wastewater Division also monitors flows into the Santa Monica Bay.[5]

As shown in **Table IV.N.2-1, Existing Capacity of Hyperion Sanitary Sewer System**, the HWRP has the capacity to treat approximately 450 mgd of wastewater for full secondary treatment level and currently treats 275 mgd.[6] As such, the remaining capacity at the HWRP is approximately 175 million gpd or approximately 39 percent of its total capacity. The City has an agreement with the City of Los Angeles that permits an average flow of 2.75 mgd of wastewater treatment and disposal capacity in HWRP.[7] Approximately 2.66 mgd of sewage is generated in the City's existing sewer service area, a total of 1.17 mgd of which is conveyed to the HWRP via the City of Los Angeles Hyperion Outfall, with the remaining volume conveyed to other facilities of the Sanitation District of Los Angeles County.[8]

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2 *City of Los Angeles, LASAN, Treatment Process Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tp. Accessed August 2023.*

3 *City of Los Angeles, LASAN Hyperion Virtual Tour Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp. Accessed August 2023.*

4 *California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2017-0045, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean, effective April 1, 2017 through April 30, 2028.*

5 *City of Los Angeles, LASAN, Environmental Monitoring www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em. Accessed August 2023.*

6 *City of Los Angeles, LASAN, Hyperion Water Reclamation Plant Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp. Accessed August 2023.*

7 *City of El Segundo, Pacific Coast Commons Specific Plan, Draft Environmental Impact Report, February 2021, page 4.15-6.*

8 *City of El Segundo, Smoky Hollow Specific Plan Update DEIR, March 2018, page 19-25.*

3. Relevant Plans, Policies, and Ordinances

a) Federal

There are no relevant federal laws for wastewater collection and treatment facilities.

b) State

(1) California Green Building Code

The California Green Building Standards Code (CALGreen Code) is set forth in California Code of Regulations Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush. In addition, maximum flow rates for faucets are established at: 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

c) Regional and Local

(1) City of El Segundo General Plan

The policies outlined in the City of El Segundo General Plan Land Use Element are considered relevant to the Project, as described below:[9]

Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.

(2) City of El Segundo Municipal Code

Title 12 of the El Segundo Municipal Code regulates public sewer facilities with the purpose of preventing discharge from interfering with the operation of the system, to provide procedures with compliance with state and federal law, and to provide funds for the operation and maintenance of the City sewer system. Per Title 12 of the El Segundo Municipal Code, generally, liquid wastes originating within the City will be removed by the City sewer system, unless the wastes cause damage to structures, create nuisances such as odors, menace public health, impose unreasonable collection, treatment or disposal costs on the City, violate quantity and quality requirements prescribed by state and federal laws, interfere with wastewater treatment processes, violate applicable state and federal laws, or detrimentally affect the environment.

[9] *City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed August 2023.*

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate project impacts to utilities and service systems are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to utilities and service systems would occur if a project would:

Threshold (a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects; and***

Threshold (b): ***Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.***

b) Analysis of Project Impacts

Threshold (a): ***Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?***

(1) Construction

Future construction activities within the Specific Plan area would result in a temporary increase in wastewater generation as a result of construction activities at the Project Site. Wastewater generation would occur incrementally throughout construction future development as a result of construction workers on-site. Construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the adjacent sewer infrastructure; however, it is assumed that the waste removed from the portable restrooms would ultimately be emptied within the service boundaries of the HWRP, which is shown below under the analysis of operational impacts to have adequate capacity to treat the amount of wastewater projected to be produced by maximum buildout of the Specific Plan area. Given that the amount of wastewater that would be produced by construction of future development would be less than that produced by operation, which as discussed below can be adequately handled by existing wastewater facilities, the HWRP would have adequate capacity to treat the waste removed from the portable restrooms as well. Therefore, buildout of the Specific Plan area would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects and the impact would be less than significant and no mitigation would be required.

(2) Operation

Implementation of future development within the Specific Plan area would increase the average and peak daily wastewater flows from the Project area. Total sewage generation for the maximum buildout of the Specific Plan area has been calculated. The Specific Plan Update would allow the addition of up to 130,000 square feet of retail/restaurant uses, 200,000 square feet of general office uses, 24,000 square feet of medical office uses, and 300 multi-family residential units within the Specific Plan area. To be conservative and because the uses for each proposed commercial space have not yet been determined, it was assumed that all commercial spaces would consist of restaurants, which generates the highest flow compared to other commercial uses. As shown in **Table IV.N.2-2, Project Estimated Sewage Generation**, wastewater generation would be 221,600 gallons per day (gpd) or 0.22 mgd. It should be noted that the Project's wastewater generation estimate is conservative and does not factor in water conservation efforts that would result from the Project's mandatory compliance with the CALGreen Code.

Table IV.N.2-2
Project Estimated Sewage Generation

Land Use	Size	Generation Rate (gallons/1,000 sf/day) [1]	Total (gallons/day)
Multi-Family Residential	300 du	156 (gallons/du/day)	46,800
Retail and Restaurant	130,000 sf	1,000	130,000
Office	200,000 sf	200	40,000
Medical Office	24,000 sf	200	4,800
Total Wastewater Generation			**221,600**

Note: du = dwelling unit; sf = square feet
1 County Sanitation Districts of Los Angeles County, Table 1, Loadings For Each Class of Land Use.
Source: EcoTierra Consulting, Inc., August 2023.

(a) Wastewater Collection/Conveyance Facilities

(i) Project Area

The City's sanitary sewer lines are throughout the Specific Plan area. There are eight (8), ten (10), and twelve (12) inch diameter mains, primarily beneath Standard Street and Grand Avenue, within the Specific Plan area's public streets and alleys, except for the 300 through 400 blocks of Main Street, 100 to 200 blocks of Grand Avenue, and 100 through 200 blocks of Richmond Street. These blocks are serviced by mains located within the alleys. New sewer laterals would be proposed for all future development. It is anticipated that the new sewer laterals would connect to several of the existing gravity lines surrounding the Project area. Future sewer laterals would be designed to slope at a minimum of 2 percent and maintain a minimum scouring velocity of 2 feet per second. Points of connection would be based on the Public Works Wastewater Division's input and would require a Sewer Connection Permit from the City. Future development would be required to prepare a sewer study to analyze the impact of proposed development on the existing sewer system and to determine if the system has sufficient capacity to handle the anticipated additional sanitary loads.

Before the Public Works Wastewater Division can formally accept a set of plans and specifications for future development under the Specific Plan Update, future applicants must first determine if there is adequate sewer capacity available for future development by completing a sewer capacity study when a development proposes to connect to the sewer system. If it is determined that there is adequate sewer capacity available for a development, then the Public Works Wastewater Division would accept the plans and specifications for plan check upon the payment of plan check fees. Accordingly, based on existing conditions, expected sewer flows from the Specific Plan area, and applicable required regulatory compliance, the existing sewer mains that would serve the Project area would be able to accommodate the projected wastewater generated by buildout of the Specific Plan area.

(ii) Citywide

As previously stated, the City has a wastewater conveyance system capacity of 2.75 mgd and an average yearly flow of 2.66 mgd. The maximum wastewater flow that is anticipated for future development under the Specific Plan Update of 221,600 gpd (0.22 mgd) would represent 24.4 percent of the remaining 0.09 mgd of Citywide wastewater conveyance capacity. As such, future development under the Specific Plan Update would not cause the City to exceed the conveyance capacity of the City's wastewater system.

(b) Wastewater Treatment Facilities

Wastewater generated by the Project would be conveyed via the Public Works Wastewater Division's wastewater conveyance system within the Hyperion Sanitary Sewer System to the HWRP for treatment. The Hyperion Sanitary Sewer System has an existing design capacity of 550 mgd and currently treats approximately 314 mgd, while the HWRP has an existing design capacity of 450 mgd and currently treats approximately 275 mgd. Accordingly, the remaining available capacities within the Hyperion Sanitary Sewer System and at the HWRP are approximately 236 mgd and 175 mgd, respectively. The Project's maximum wastewater flow of 221,600 gpd (0.22 mgd) would represent approximately 0.09 percent of the current remaining capacities of the Hyperion Sanitary Sewer System and approximately 0.13 percent of the current remaining capacity of the HWRP.

As previously stated, the City has an agreement with the City of Los Angeles that permits an average flow of 2.75 mgd of wastewater treatment and disposal capacity in HWRP. The average yearly flow within the City was measured at 2.66 mgd from the City, with a total of 1.17 mgd conveyed to the HWRP with the remaining volume conveyed to other facilities of the Sanitation District of Los Angeles County.[10] Accordingly, the remaining allotted capacity at the HWRP is approximately 1.58 mgd. The maximum wastewater flow that is anticipated for future development under the Specific Plan Update of 221,600 gpd (0.22 mgd) would represent 18.8 percent of the remaining capacity at the HWRP that is allotted to the City.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will

[10] *City of El Segundo, Smoky Hollow Specific Plan Update DEIR, March 2018, page 19-25.*

ultimately determine the available future capacity of the Hyperion Service Area. Subsequent demands and new commitments on the service area are managed by Los Angeles Sanitation; therefore, additional demands on the Hyperion plant would be reviewed and monitored by Los Angeles Sanitation. However, based on the above, operation of the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects and the impact would be less than significant and no mitigation would be required.

Threshold (b): Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

(1) Construction

As discussed in **Threshold a)** above, during construction, a minimal amount of wastewater would be generated by the construction employees for future developments. Because the amount of wastewater that would be produced by construction would be less than that which would be produced by operation and because the Hyperion Sanitary Sewer System would have adequate capacity to treat the wastewater that would be produced at full buildout of the Specific Plan area, the Hyperion Sanitary Sewer System would also have adequate capacity to treat the wastewater that would be produced by construction. Accordingly, there would be adequate treatment capacity to serve the projected demand during construction. Therefore, the Project would result in a determination by the wastewater treatment provider that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments and impacts would be less than significant and no mitigation would be required.

(2) Operation

As discussed in **Threshold a)** above, future development would be required to prepare a sewer study to analyze the impact of proposed development on the existing sewer system and to determine if the system has sufficient capacity to handle the anticipated additional sanitary loads. In addition, as indicated previously, the maximum buildout of the Specific Plan area would represent nominal percentages of remaining capacities of the Hyperion Sanitary Sewer System and the HWRP. Therefore, there is also ample capacity within the Hyperion Sanitary Sewer System and the HWRP to treat the wastewater projected to be generated during operation. Accordingly, there would be adequate treatment capacity to serve the projected demand during operation. Therefore, the Project would not result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's demand in addition to the provider's existing commitments, and, as such, impacts would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

Cumulative development under the Project and related projects would increase the amount of wastewater that is being generated in the area. As detailed in **Table II-1, List of Related Projects,**

in **Section II, Environmental Setting**, of this EIR, there are 13 related projects in the City that would cumulatively increase the generation of wastewater as a result of construction and operation of residential, office, and various commercial land uses. **Table IV.N.2-3, Cumulative Wastewater Generation**, details the estimated wastewater that would be generated by operation of cumulative development within the City, including the Project.

Table IV.N.2-3
Cumulative Wastewater Generation

ID	Project	Size	Generation Rate (gal/1,000 sf/day) [1]	Total (gal/day)
1	**Housing Element**			
	Residential	1,846 du	156 (gal/du/day)	287,976
	Retail	46,770	325	15,200
2	**Pacific Coast Commons Specific Plan (EA 1248)**			
	Residential	263 du	156 (gal/du/day)	41,028
	Retail/Restaurant	11,252	1,000	11,252
3	**South Campus (Raytheon) Specific Plan**			
	Retail/Restaurant	126,310	1,000	126,310
	Office	1,547,407	200	309,481
	Industrial/Warehouse	259,840	25	6,496
	Nash Street Exchange Part A			
	Medical Office	43,000	200	8,600
	Restaurant	19,150	1,000	19,150
	Nash Street Exchange Part B			
	Restaurant	3,500	1,000	3,500
	Chargers Training Facility and Headquarters			
	Corporate Office	143,250	200	28,650
4	**Stick n Stein Mixed Use (EA 1325)**			
	Residential	50 du	156 (gal/du/day)	7,800
	Commercial Retail	14,000	325	4,550
5	**201-209 Richmond St. (EA 1299)**			
	Retail	3,307	325	1,075
	Office	9,450	200	1,890
	Residential	4 du	156 (gal/du/day)	624
6	**Beach Cities Media Campus Phase 1 and 2 Office Campus (EA 1339)**			
	Office	240,000	200	48,000
	Studio/Production Facilities	66,000	200	13,200
	Retail	7,000	325	2,275
7	**650-700 N PCH Office (EA 1289)**			
	Office	122,156	200	24,431
8	**1950-1960 E. Grand Ave. (EA 1291)**			
	Office	105,469	200	21,094
9	**Smoky Hollow Specific Plan (partial)**			
	Commercial	22,461	325	7,300
	R&D	404,584	200	80,917
	Office	1,042,103	200	208,421
	Standard Works Project North			
	Office	45,568	200	9,114
	Coffee Kiosk	766	1,000	766
	Standard Works Project South			
	Office	44,604	200	8,921
	212 Eucalyptus Dr. (EA 1254)			

Table IV.N.2-3
Cumulative Wastewater Generation

ID	Project	Size	Generation Rate (gal/1,000 sf/day) [1]	Total (gal/day)
	Office	14,119	200	2,824
	140 Sheldon St.			
	Office	800	200	160
	Caretaker Units Project			
	Residential	6 du	156 (gal/du/day)	936
10	**140 Oregon St. (EA 1233)**			
	Office Addition	57,675	200	11,535
11	**141 Eucalyptus Dr. (EA 1292)**			
	Office	8,882	200	1,776
12	**445 N. Douglas – Data Center Phase 2**			
	Data Center	155,664	200	31,133
13	**2200 Grand Parking Structure and Office**			
	Office	16,934 (net)	200	3,387
			Wastewater Generation (Project)	221,600
			Total Cumulative Wastewater Generation	**1,571,371**

gal = gallons; sf = square feet; du= dwelling unit
1 Generation rate source: County Sanitation Districts of Los Angeles County, Table 1, Loadings For Each Class of Land Use. "Shopping Center" rate used for retail and commercial land uses; "Restaurant" rate used for coffee kiosk and combined retail/restaurant land uses; "Office Building" rate used for medical office, R&D, studio/production facilities, and data center land uses.
Source (table): EcoTierra Consulting Inc., January 2024.

As shown in **Table IV.N.2-3**, cumulative development under the Project and related projects would generate approximately 1.57 mgd of wastewater. It should be noted that the calculations used the higher "Restaurant" generation rate of 1,000 gallons per 1,000-square-feet per day for any combined retail/restaurant land use reported under a related project when any retail land use under the combined square footage would generate wastewater at the much lower "Shopping Center" rate of 325 gallons per 1,000-square-feet per day. In addition, similar to the Project, related projects would be required to comply with applicable water conservation programs, including the CALGreen Code, which would reduce wastewater generation. Such reductions due to water conservation are not accounted for in the standard wastewater generation rates used to estimate the potential wastewater that would be generated by future development. Furthermore, due to the built-out nature of the City, the vast majority of the identified related projects would be redevelopment replacing existing uses that currently generate wastewater. Therefore, the calculations of cumulative wastewater generation are considered to be highly conservative.

As discussed above, the City the remaining capacity of the Citywide wastewater conveyance system is 0.09 mgd. Accordingly, the 1.57 mgd of wastewater that would be generated by cumulative development within the City would exceed the remaining capacity of Citywide conveyance infrastructure. However, similar to future development in the Specific Plan area, the capacity of receiving sewer lines that would serve development of related projects would be determined on a project-specific basis. As discussed above, future development within the Specific Plan area would conduct an analysis of existing and planned capacity and determine if adequate capacity exists to serve the development. Similarly, related projects would be required to coordinate with the Public Works Wastewater Division to determine adequate sewer capacity.

If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the future project and the Public Works Wastewater Division to construct the necessary improvements. Points of connection would be based on the Public Works Wastewater Division's input and would require a Sewer Connection Permit from the City. In the event that sewer upgrades are required due to cumulative projects, all construction work within the City public rights-of-way would be subject to local municipal code and applicable agency requirements, and would be subject to CEQA review accordingly. Therefore, a cumulative impact to sewer infrastructure would not occur.

As with wastewater generated by the Project, wastewater generated by the related projects would be conveyed via the existing wastewater conveyance systems of the Hyperion Sanitary Sewer System for treatment at the HWRP system. As previously stated, the existing design capacity of the Hyperion Sanitary Sewer System is approximately 550 mgd and the existing average daily flow for the system is approximately 314 mgd.[11] In addition, the HWRP has an existing design capacity of 450 mgd and currently treats approximately 275 mgd.[12] Therefore, the remaining capacity within the Hyperion Sanitary Sewer System is approximately 236 mgd while the remaining capacity at the HWRP is 175 mgd. In addition, the City has an agreement with the City of Los Angeles that permits an average flow of 2.75 mgd of wastewater treatment and disposal capacity in HWRP. The average yearly flow within the City's system was measured at 2.66 mgd, with 1.17 mgd conveyed to the HWRP. Accordingly, the remaining capacity of the HWRP allotted to the City is approximately 1.58 mgd.[13] Therefore, there is existing capacity to convey and treat the 1.57 mgd of cumulative wastewater within the Hyperion Sanitary Sewer System and at the HWRP, including the flow allocated to the City by the City of Los Angeles. The 1.57 mgd of cumulative wastewater generation would nearly meet the City's remaining allocated capacity of 1.58 mgd under the current agreement with the City of Los Angeles. However, because wastewater generated by related projects would primarily be redevelopment that would replace existing uses which currently generate wastewater and because, as with future development under the Project, related projects would also be subject to the water conservation requirements and standards, the "net' wastewater that would be generated by cumulative development is anticipated to be much lower and would not exceed the City's allocated treatment capacity at the HWRP under the current agreement with the City of Los Angeles.

As previously discussed, future development within the Specific Plan area would represent a negligible percentage of the City's total and remaining capacity both within the total conveyance system as well as within the HWRP. Based on the above, it is anticipated that wastewater generated by related projects would represent similarly negligible portions of existing and remaining conveyance and treatment capacities. Accordingly, as under the Project, development of related projects would not generate wastewater that would exceed the capacity of the City's conveyance facilities or the total or allotted treatment capacity of the HWRP. Therefore, Project

[11] *City of Los Angeles, LASAN, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan, April 2018, page 59.*

[12] *City of Los Angeles, LASAN, Hyperion Water Reclamation Plant Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp. Accessed August 22, 2022.*

[13] *City of El Segundo Smoky Hollow Specific Plan Update DEIR, March 2018.*

impacts with regard to wastewater would not be cumulatively considerable, and cumulative impacts would be less than significant. No mitigation would be required.

6. Mitigation Measures

Project-level and cumulative impacts with regard to wastewater services would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to wastewater services would be less than significant.

8. References

California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2017-0045, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean, effective April 1, 2017 through April 30, 2028.

City of Los Angeles, LASAN, "Environmental Monitoring" www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em.

City of Los Angeles, LASAN, "Hyperion Virtual Tour" Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp.

City of Los Angeles, LASAN, "Hyperion Water Reclamation Plant" Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp.

City of Los Angeles, LASAN, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan, April 2018.

City of Los Angeles, LASAN, "Treatment Process" Website, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tp.

City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362.

City of El Segundo, Pacific Coast Commons Specific Plan, Draft Environmental Impact Report, February 2021.

City of El Segundo, Smoky Hollow Specific Plan Update DEIR, March 2018.

IV. Environmental Impact Analysis

N. Utilities and Service Systems

3. Solid Waste

1. Introduction

This section provides an analysis of the El Segundo Downtown Specific Plan Update (Project) potential impacts on solid waste facilities, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Other sources consulted are listed in **Section IV.N.3.8, References**, below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR.

2. Existing Conditions

a) Solid Waste Collection and Transport

Within the City, solid waste management, including collection and disposal services and landfill operation, is administered by various public agencies and private companies. Single-family and duplex residents are provided waste and recycling collection services by EDCO. Trash and recycling services for businesses and multi-family properties (three or more units) is the responsibility of the property owner. Solid waste disposal is provided by a variety of private haulers. The type of service residents receive is the choice of the property owner, building manager, association, etc., which can choose from a list of 16 haulers permitted with the City to collect solid waste, organics, or recyclables.[1]

b) Landfills

Waste disposal sites (i.e., landfills) are operated by the County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction

[1] *City of El Segundo, Department of Public Works, Trash and Recycling, website: https://www.elsegundo.org/government/departments/public-works/trash-recycling. Accessed August 2023.*

and/or wasteshed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region).

(1) Class III Landfills

Non-hazardous solid waste generated within the City of El Segundo is transported to Los Angeles County landfills. In 2020, the most recent year for which reported data is available, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and out-of-county landfills was approximately 11 million tons (including an import amount of 178,374 tons). Collectively, the 10 Class III located within Los Angeles County have a maximum daily permitted capacity of 45,297 tons per day, an average daily disposal intake of 19,291 tons per day, and an estimated remaining permitted total capacity of 142.67 million tons.[2] **Table IV.N.3-1, Solid Waste Facilities**, presents the permit and operational details of the three closest landfills to the Project area. As shown in **Table IV.N.3-1**, the three closest landfills to the Project area have a combined permitted daily capacity of 7,140 tons per day, an average daily disposal intake of 2,486 tons per day, and a remaining permitted total capacity of 9.81 million tons.

Table IV.N.3-1
Solid Waste Facilities

Solid Waste Facility	Distance from Project Area	Remaining Capacity (million tons)	Maximum Permitted Daily Capacity (tons per Day)	Average Daily Disposal (tons per day)	Estimated Remaining Life (years) [1]
Scholl Canyon Landfill	30 miles northeast	3.41	3,400	1,453	8
Burbank Landfill Site No. 3	32 miles northeast	2.37	240	106	33
Calabasas Landfill	35 miles northwest	4.03	3,500	927	9
	Total	**9.81**	**7,140**	**2,486**	**--**

1 Based on 2020 average daily disposal, maximum permitted capacity as of December 31, 2020, and permit restrictions as of December 31, 2020.
Source: County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

(2) Inert Waste and Debris

Construction waste is typically disposed of at inert landfills, which are facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. As of 2020, the Azusa Land Reclamation Landfill, located approximately 50 miles northeast of the Project Site, is the only inert waste facility in the County operating under a full solid waste permit. The facility is permitted to accept up to 8,000 tons of inert waste, including asbestos-containing

[2] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

materials (ACMs), municipal solid waste, clean and contaminated (non-hazardous) soils, and tires, per day, and accepted a total of 321,830 tons of inert waste in 2020.[3] With an estimated remaining capacity of 64.64 million tons (51.71 million cubic yards) and an average of 1,032 tons of inert waste per day, the Azusa Land Reclamation Landfill has capacity to operate for another 201 years; however, the facility is only permitted to operate until 2045.[4]

There are nine additional inert debris facilities in Los Angeles County that operate under the notification tier (i.e., those that do not require a full solid waste permit or other authorization tier), which can collectively accept up to 27,130 tons (21,704 cubic yards) per day. In 2020, these facilities accepted a total of 3,423,466 tons (2,738,772 cubic yards) of inert waste, with an average daily disposal rate of 10,973 tons (8,778 cubic yards).[5]

(3) Transfer and Processing

A transfer station / processing facility is a facility which receives, handles, separates, converts, or otherwise processes solid waste and typically includes: transfer stations, material recovery facilities (MRFs), and construction, demolition, and inert (CDI) debris processing facilities. Transfer stations transfer solid waste directly from one container to another or from one vehicle to another for transport, or temporarily store solid waste prior to final disposal at landfills or transformation facilities. MRFs refer to intermediate processing facilities designed to remove recyclables and other valuable materials from the waste stream. A CDI debris processing facility is a site that receives any combination of construction and demolition debris and Type A[6] inert debris for the purposes of storage, handling, transferring, or processing. There are 43 permitted Large Volume Transfer/Processing and Direct Transfer Facilities, which are collectively permitted to receive up to 68,898 tons of waste per day, and numerous smaller volume facilities operating within the County.[7] In addition, there are 11 Large Volume Transfer/Processing Facilities that fall under the umbrella of Clean MRF, which refers to a facility that separates materials from co-mingled recyclables, typically collected from residential or commercial curbside programs. These 11 facilities are permitted to accept up to 11,889 tons of Clean MRF per day.[8]

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[3] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, page 27.*

[4] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, page 36.*

[5] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2, Table 5: Summary of Existing Inert Debris Disposal Sites in Los Angeles County (As of December 31, 2020).*

[6] *Type A inert debris includes, but is not limited to, concrete (including embedded fiberglass or steel reinforced bar); fully cured asphalt; crushed glass; fiberglass; asphalt or fiberglass roofing shingles; brick; slag; ceramics; plaster; and clay products.*

[7] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, page 36 and Appendix E-4, Transfer/Processing Facilities in Los Angeles County.*

[8] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-4, Transfer/Processing Facilities in Los Angeles County.*

(4) Composting/Chipping/Grinding and Anaerobic Digestion

A composting facility refers to a facility that processes organic materials such as green waste, manure, food waste, and other organics. A chipping and grinding facility is one that separates, grades, and resizes woody green waste, or used lumber to be sent to a composting facility, used at a landfill for cover, or sent to miscellaneous end markets, such as feedstock for biomass to energy plants. An anaerobic digestion facility refers to a facility that biologically decomposes organic matter with little or no oxygen in a fully enclosed structure to produce biogas, liquid fertilizer, and compost. The County has 19 operational Composting/Chipping and Grinding Facilities, which are permitted to collectively receive a total of 489 tons of material per day, and 3 anaerobic digestion facilities, which are permitted to collectively accept a total of 434 tons of material per day.[9]

3. Relevant Plans, Policies, and Ordinances

a) Federal

There are no relevant federal laws pertaining to solid waste or solid waste facilities.

b) State

(1) Assembly Bills 939 and 341: Solid Waste Reduction

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) was enacted as a result of a national crisis in landfill capacity, as well as a broad acceptance of the desired approach to solid waste management of reducing, reusing, and recycling. AB 939 mandated local jurisdictions to meet waste diversion goals of 25 percent by 1995 and 50 percent by 2000 and established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. AB 939 requires cities and counties to prepare, adopt, and submit to the California Department of Resources Recycling and Recovery (CalRecycle) a source reduction and recycling element to demonstrate how the jurisdiction will meet the diversion goals. Other elements included encouraging resource conservation and considering the effects of waste management operations. The diversion goals and program requirements are implemented through a disposal-based reporting system by local jurisdictions under California Integrated Waste Management Board (CIWMB) regulatory oversight. Since the adoption of AB 939, landfill capacity is no longer considered a statewide crisis. AB 939 has achieved substantial progress in waste diversion, program implementation, solid waste planning, and protection of public health, safety, and the environment from landfills operations and solid waste facilities.

[9] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-5, Composting, Chipping and Grinding, and Anaerobic Digestion Facilities in Los Angeles, County.*

AB 341, signed on February 10, 2011, directed that no less than 75 percent of solid waste generated in California be source reduced,[10] recycled, or composted by 2020, and required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. Responsibilities of local jurisdictions under AB 341 include implementation of an education, outreach, and monitoring program for commercial recycling by July 1, 2012. Land uses subject to the commercial recycling requirements include businesses generating four or more cubic yards of commercial solid waste per week and multifamily residential dwelling of five or more units.

(2) Senate Bill 1374: Construction and Demolition Waste Reduction

SB 1374 requires that annual reports submitted by local jurisdictions to CIWMB include a summary of the progress made in diversion of construction and demolition waste materials. In addition, SB 1374 requires the CIWMB to adopt a model ordinance suitable for adoption by any local agency that required 50 percent to 75 percent diversion of construction and demolition waste materials from landfills. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CIWMB's model by default.

(3) Assembly Bill 1327: California Solid Waste Reuse and Recycling Access Act of 1991

AB 1327, which was established in 1991, required CalRecycle to develop a model ordinance governing adequate areas for collection and loading of recyclable materials in development projects. Local agencies were then required to adopt the model ordinance, or an ordinance of their own, and prohibit the issuance of a building permit unless adequate areas for collection and loading of recyclables is provided.

(4) Assembly Bill 1826: Mandatory Commercial Organics Recycling

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses. Additionally, each jurisdiction is to identify a multitude of information, including barriers to siting organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling facilities. AB 1826 defines "organic waste" as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. It also defines a "business" as a commercial or public entity, including, but not limited to, a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units. AB 1826 also contains phased requirements for organic waste recycling applicable to businesses as follows: (1) as of April 1, 2016, businesses that generated 8 cubic yards or more

[10] *Source reduction refers to activities designed to reduce the volume, mass, or toxicity of products throughout their life cycle. It includes the design and manufacture, use, and disposal of products with minimum toxic content, minimum volume of material, and/or a longer useful life.*

of organic waste per week were required to arrange for recycling of organic waste; (2) commencing January 1, 2017, the threshold was reduced to businesses that generate 4 cubic yards or more of organic waste per week; (3) on and after January 1, 2019, businesses that generate four cubic yards or more of commercial solid waste (i.e., total of trash, recycling, and organics) are also required to arrange for organic waste recycling; and (4) a trigger adjustment to further increase the scope of affected businesses in 2020. Pursuant to this trigger adjustment, in September 2020, CalRecycle reduced the threshold to 2 cubic yards of solid waste per week generated by covered businesses.[11]

(5) Title 24, Building Standards Code, Part 11, California Green Building Standards Code

The purpose of the California Green Building Standards Code (CALGreen) is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met for a building to be approved. The voluntary measures can be adopted by local jurisdictions for greater efficiency. The most recent update to CALGreen, the 2022 CALGreen Code, went into effect January 1, 2023.

Per 2022 CALGreen standards, 65 percent of construction and demolition (C&D) waste from new construction must be diverted from landfills and either recycled or salvaged for reuse. Section 5.408, Construction Waste Reduction, Disposal and Recycling, of CALGreen outlines three methods of compliance for the C&D diversion requirement, with two options below being potentially applicable to the proposed Project. First, owners/builders can comply with the C&D diversion requirement by developing and submitting a construction waste management plan to the City that identifies the C&D waste materials to be diverted from disposal by recycling, reuse on the project, or salvage. Alternately, owners/builders may use a waste management company that can provide verifiable documentation that the percentage of C&D waste material diverted from the landfill meets CALGreen's 65 percent requirement.

c) Regional and Local

(1) County Integrated Waste Management Plan

Pursuant to AB 939, each County is required to prepare and administer a ColWMP, including preparation of an Annual Report. The ColWMP is to comprise of the various counties' and cities' solid waste reduction planning documents, plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element (CSE). The Summary Plan describes the steps

[11] *California Department of Resources Recycling and Recovery, Mandatory Commercial Organics Recycling, website: www.calrecycle.ca.gov/recycle/commercial/organics/. Accessed August 2023.*

to be taken by local agencies, acting independently and in concert, to achieve the mandated State diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The County's Department of Public Works is responsible for preparing and administering the Summary Plan and the CSE.

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the CoIWMP Annual Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. The most recent annual report, the CoIWMP 2020 Annual Report, published in October 2021, provides disposal analysis and facility capacities for 2020, as well as projections to the CoIWMP's horizon year of 2035. As stated within the CoIWMP 2020 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.[12] A variety of strategies, including an increase in waste reduction and diversion efforts, development of alternative technologies, utilization of the Waste-by-Rail system to mesquite Regional Landfill, and (if found to be environmentally sound and technically feasible) expansion of County Class III landfill capacity, would be implemented to ensure that the County would be able to accommodate the solid waste generated through the horizon year of 2035.[13]

(2) City of El Segundo General Plan

The policies outlined in the City of El Segundo General Plan Land Use Element are considered relevant to the Project, as described below:[14]

Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.

(3) Proposed Specific Plan

Standards and guidelines set forth in the Specific Plan Update's Development Standards that are relevant for the topic of solid waste include the following:

6.2. Loading/unloading, service areas, and trash and recycling enclosures shall not front onto Grand Avenue, Main Street, or Richmond Street.

6.7. Refuse collection service shall be contracted with an approved local service provider. Refuse collection areas shall be screened per ESMC Section 15-2-8 D.

6.8. On lots adjoining an alley, refuse collection storage areas shall be oriented to and accessed from the alley.

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[12] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, page 6.*

[13] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, page 6.*

[14] *City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362, accessed March 2023.*

F.4. All alleyway enhancements should include: trash and recycling receptacle consolidation and concealment.

C.1.2. To create a more organized and efficient use of sidewalk space, furnishing shall be grouped together rather than scattered. Trash and recycling cans shall be located near benches. A greater frequency of the number of furnishings should be in higher-use pedestrian traffic areas.

C.1.a.5. Trash and recycling receptacles should be places to provide convenient waste disposal in key locations such as entries, seating areas, bus stops, and along walkways throughout the Specific Plan area.

C.1.a.6. Trash receptacles should be used in conjunction with other furnishings and should be placed away and/or located downwind from seating areas where feasible.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate project impacts to utilities and service systems are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to utilities and service systems would occur if a project would:

Threshold (a): ***Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals; and***

Threshold (b): ***Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.***

b) Analysis of Project Impacts

Threshold (a): ***Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals?***

(1) Construction

Although the Project does not propose specific development or other construction activities, it would allow for future redevelopment consistent with the proposed land use designations, zoning, standards, and guidelines established in the Specific Plan Update. Specifically, the Project would allow increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units, as well as mobility enhancements and modifications to parking strategies that would involve construction and other physical changes.

Redevelopment activities associated with the proposed Project would result in the generation of C&D debris, such as concrete, asphalt, wood, drywall, metals, other miscellaneous and composite materials, and soils/fills; and general construction waste, such as scrap lumber, concrete, drywall, residual wastes, packing materials, and plastics. Much of these materials would be diverted from landfills and recycled and salvaged to the maximum extent feasible with a minimum diversion rate of 65 percent pursuant to CALGreen standards. Construction activities associated with the Specific Plan Update would be required to show compliance with regulatory diversion rates through preparation of a construction waste management plan or use of a C&D hauler with documented and verifiable diversion rates meeting CALGreen's 65 percent requirements. The remaining 35 percent of C&D debris and construction waste that is not required to be recycled would either be disposed of in a regional landfill or voluntarily recycled at a solid waste facility with available capacity. As described above in **Subsection IV.N.3.2, Existing Conditions**, the inert landfill in the county (Azusa Land Reclamation landfill) has a remaining capacity of 64.64 million tons (51.71 million cubic yards) and is permitted to operate until 2045. Nine additional inert debris facilities in Los Angeles County can collectively accept up to 27,130 tons (21,704 cubic yards) per day. Due to the temporary nature of construction and required compliance with the City's recycling mandates, the types and amounts of construction anticipated to occur under the Specific Plan Update would not be expected to generate waste in excess of standards. Additionally, based on the daily and total capacities and anticipated operational duration of existing facilities that accept inert waste in the county, construction that would occur under the Project would also not generate waste in excess of the capacity of local infrastructure. Through mandatory compliance with regulatory diversion rates, construction activities would not otherwise impair the attainment of solid waste reduction goals. Therefore, impacts during construction activities conducted consistent with the Specific Plan Update would be less than significant and no mitigation would be required.

(2) Operation

Once operational, future redevelopment within the Project area would produce solid waste on a regular basis as a result of operation and maintenance activities. Solid waste generated by development within the Project area would be of types and amounts typical for commercial, office, and residential land uses. Based on the default CalEEMod solid waste generation rates, the proposed Project would generate approximately 2.6 tons of solid waste per day (**Appendix C, CalEEMod Outputs**).[15] All solid waste-generating activities within the City, including within the Project area, would continue to be subject to the requirements set forth in AB 939. Therefore, it is estimated that a minimum of 50 percent of this solid waste would be diverted from landfills. Due to the types of waste that would be generated within the Project area and required compliance with diversion requirements, operation of redevelopment anticipated to occur under the Specific Plan Update would not be expected to generate waste in excess of standards.

[15] *Note that CalEEMod reports the estimated solid waste generation of the Project as 804 tons per year. In the Countywide Integrated Waste Management Plan 2020 Annual Report, the Los Angeles County, Department of Public Works uses an average daily disposal rate based on 312 days per year (6 days per week average). 804 tons per year / 312 days per year = 2.6 tons per day.*

As previously discussed in **Subsection IV.N.3.2, Existing Conditions**, there are three landfills within approximately 35 miles of the Project area: Scholl Canyon landfill; Burbank Landfill Site No. 3; and Calabasas landfill. Collectively, these nearby landfills have a permitted daily capacity of 7,140 tons per day and an average daily intake of 2,486 tons per day. As such, the amount of solid waste that could potentially be generated within the Project area would represent 0.04 percent of the daily permitted capacity and 0.06 percent of the remaining daily capacity after accounting for the existing average daily intake for the three closest landfills. Furthermore, all 10 existing Class III landfills within Los Angeles County have a collective maximum daily permitted capacity of 45,297 tons per day, an average daily disposal intake of 19,291 tons per day, and an estimated remaining permitted total capacity of 142.67 million tons. Additionally, as previously detailed, existing Large Volume Transfer/Processing and Direct Transfer Facilities within the county are collectively permitted to receive waste in excess of 68,898 tons per day and up to 11,889 tons of Clean MRF per day; and existing Composting/Chipping and Grinding Facilities and anaerobic digestion facilities are permitted to collectively receive a total of 923 tons of green waste material per day. Therefore, there would be adequate infrastructure capacity within the county to receive, transfer, process, and/or compost/chip/grind/digest the anticipated amount of solid waste, including recyclables and green waste, that would be generated under redevelopment associated with the Specific Plan Update, and the Project would not generate solid waste that would exceed the capacity of local infrastructure.

Compliance with regulatory standards and requirements with regard to solid waste would be mandatory for all redevelopment that could occur under the Specific Plan Update. As stated above, redevelopment would be subject to the requirements of AB 939 to divert a minimum of 50 percent of solid waste from landfills. Any businesses generating four or more cubic yards of commercial solid waste per week and multifamily residential dwelling of five or more units would be required to comply with the recycling requirements of AB 341 and those generating 2 or more cubic yards of solid waste per week would be required to comply with the organic waste recycling requirements of AB 1826.

Through mandatory compliance with regulatory diversion rates, operational activities associated with redevelopment that would occur within the Project area would not otherwise impair the attainment of solid waste reduction goals. Therefore, impacts during redevelopment consistent with the Specific Plan Update would be less than significant and no mitigation would be required.

Threshold (b): Would the Project not comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Statutes and regulations related to the management and reduction of solid waste include AB 939, AB 341, SB 1374, AB 1327, and AB 1826. The Specific Plan Update's compliance with these statutes and regulations is presented below.

(1) Consistency with AB 939

AB 939 requires the City to divert a minimum of 50 percent of solid waste generated within the City from landfills. Although AB 939 does not establish requirements for individual land uses,

redevelopment within the Project area would be required to comply with AB 341, AB 1826, ESMC Section 5-9-4, and the CALGreen code. Pursuant to AB 341 and AB 1826, redevelopment that would occur under the Specific Plan Update within the Project area would be required to recycle traditional recyclable and organic materials, respectively. ESMC Section 5-9-4 further requires commercial businesses and multi-family residences to provide containers for the collection of source-separated organic waste and source-separated recyclable materials in all indoor and outdoor areas where disposal containers are provided for customers to deposit materials generated by that business. In addition, all construction activities associated with redevelopment under the Specific Plan Update would be required to comply with the CALGreen code requirement to divert 65 percent of C&D waste. Through adherence to mandatory state and local statutes and regulations, the Project would not conflict with the City's ability to comply with the diversion requirements of AB 939.

(2) Consistency with AB 341

AB 341 requires the state to divert a minimum of 75 percent of solid waste generated within the state from landfills and requires the City to implement a commercial recycling program. As discussed above, AB 341 requires businesses to recycle. The types of redevelopment anticipated to occur under the Specific Plan Update are of a size and type that would be subject to the requirements of AB 341 and, as such, redevelopment within the Project area would be required to recycle. Additionally, redevelopment would be required to recycle organic waste pursuant to AB 1826 and to provide on-site collection of source-separated recyclables and organic waste pursuant to ESMC 5-9-4. Furthermore, construction activities associated with redevelopment of the Project area would also divert a minimum of 65 percent of solid waste generated during construction pursuant to the CALGreen code. Through adherence to mandatory state and local statutes and regulations, the Project would not conflict with the City's ability to implement a commercial recycling program or the state's ability to comply with the diversion requirements of AB 341.

(3) SB 1374

SB 1374 requires the CIWMB to adopt a model ordinance for requiring diversion of C&D waste that is adoptable by local jurisdictions. Although SB 1374 does not require local jurisdictions to adopt the model ordinance, it requires local jurisdictions, including the City, to detail progress made within their jurisdictions with regard to diversion of C&D waste in annual reports to the CIWMB. Although there are no specific requirements or quantifiable diversion targets applicable to individual land uses, construction activities that would occur as part of redevelopment within the Specific Plan area would be required to divert 65 percent of C&D waste pursuant to the requirements of the CALGreen code and such diversion would be included in the City's annual reports to the CIWMB. Therefore, the Specific Plan Update would not conflict with SB 1374.

(4) AB 1327

AB 1327 requires the City to adopt CalRecycle's model ordinance governing adequate areas for collection and loading of recyclable materials in development projects or adopt an ordinance of

their own, and to prohibit the issuance of a building permit for development projects unless adequate areas for collection and loading of recyclables is provided. The City's requirements governing the provision of recyclable collection and loading space is governed by ESMC Title 5, Chapter 2, Solid Waste Management, and Title 5, Chapter 9, Mandatory Organic Waste Disposal Reduction. Pursuant to the ESMC requirements, redevelopment within the Project area would be required to provide adequate on-site areas for the collection and separation of recyclable material and organic waste. Accordingly, the Project would not conflict with the City's ability to meet the space allocation requirements of AB 1327.

(5) AB 1826

AB 1826 requires the City to implement an organic waste recycling program for businesses. In addition, AB 1826 requires businesses to recycle organic waste. The types of redevelopment anticipated to occur under the Specific Plan Update are of a size and type that would be subject to the requirements of AB 1826 and, as such, redevelopment within the Project area would be required to recycle organic waste. Additionally, redevelopment would be required to provide on-site collection of source-separated recyclables and organic waste pursuant to ESMC 5-9-4. Accordingly, the Project would not conflict with AB 1826.

(6) Conclusion

As detailed above, the proposed Project would be required to comply with all applicable local and state regulations related to solid waste. Specifically, construction activities that would occur under the Specific Plan Update would be required to comply with the requirements of the CALGreen code to divert 65 percent of C&D waste. During operation, the types of redevelopment projects that are anticipated to occur under the Specific Plan Update are of a type and size that would be subject to the recyclable diversion requirements of AB 341 and the organic waste diversion requirements of AB 1826. Redevelopment would also be subject to the space allocation requirements established in ESMC Title 5, Chapters 2 and 5. As such, the Specific Plan Update would not conflict with or inhibit the City's or state's abilities to comply with AB 939, AB 939, AB 341, SB 1374, AB 1327, or AB 1826.

In addition, because the waste generation anticipated to occur within the Project area under the Specific Plan Update would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, implementation of the Specific Plan Update would not otherwise impact the attainment of solid waste reduction goals. Based on the above, the Specific Plan Update would comply with federal, state, and local management and reduction statutes and regulations related to solid waste and impacts would be less than significant. No mitigation would be required.

5. Cumulative Impact Analysis

As defined in the State CEQA Guidelines Section 15130, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, present, and probable future projects within the cumulative impact area for solid waste. As detailed in **Table II-**

1, List of Related Projects, in **Section II, Environmental Setting**, of this EIR, there are 13 related projects in the City that would cumulatively increase the generation of solid waste as a result of construction and operation of residential, office, and various commercial land uses. The cumulative study area used to assess potential cumulative impacts to solid waste is the County of Los Angeles because the landfills open to the City of El Segundo serve the entire County. In 2019, the County disposed of approximately 11.1 million tons of solid waste, or 35,577 tons per day, with the City of El Segundo disposing of approximately 46,016 tons, or 147 tons per day.[16,17]

Cumulative impacts related to solid waste would result when projects collectively increase the generation of solid waste in excess of state or local standards, in excess of the capacity of local infrastructure, or in such a manner that the attainment of solid waste reduction goals is impaired or that does not comply with federal, state, and local management and reduction statutes and regulations. Increases in land uses result in increases in the amount of solid waste generated within a jurisdiction. **Table IV.N.3-2, Cumulative Solid Waste Generation**, details the estimated solid waste that would be generated by operation of cumulative development within the City, including from the Project. As shown in **Table IV.N.3-2**, cumulative development within the City would generate approximately 95.6 tons of solid waste per day. It should be noted that due to the built-out nature of the City, cumulative generation of solid waste would likely occur from redevelopment that is replacing existing land uses that already generate solid waste. Such existing waste is already adequately collected and disposed of in City-serving landfills and the replacement of these existing solid waste streams by redevelopment would result in a lower "net" generation for new land uses that would occur within the cumulative study area. Therefore, this estimated cumulative solid waste generation is considered to be highly conservative.

Table IV.N.3-2
Cumulative Solid Waste Generation

Source [1]	Generation Unit [1]	Generation Rate [2]	Solid Waste Generated (pounds/day)	Solid Waste Generated (tons per day)
Residential (Related Projects)	2,169 dwelling units	12.23 pounds/unit/day	26,527	13.3
Non-Residential (Related Projects)	15,131 employees	10.53 pounds/employee/day	159,329	79.7
			Solid Waste Generation (Project)	2.6
			Total Cumulative Solid Waste Generation	**95.6**

*1 Refer to **Table II-1, List of Related Projects,** in **Section II, Environmental Setting**, of this EIR for details of Related Project sources and generation units.*
2 Source: City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, page M.3-2.
Source (table): EcoTierra Consulting, Inc., January 2024.

[16] *In the Countywide Integrated Waste Management Plan 2020 Annual Report, the Los Angeles County, Department of Public Works uses an average daily disposal rate based on 312 days per year (6 days per week average). 11.1 million tons per year / 312 days per year = 35,577 tons per day; 46,016 tons per year / 312 days per year = 147 tons per day.*

[17] *California Department of Resources Recycling and Recovery, Disposal Reporting, Single-Year Countywide Origin Detail, website: https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Origin/CountywideDetail, accessed October 12, 2023.*

Based on the collective permitted daily capacity of 7,140 tons per day and an average daily intake of 2,486 tons per day for the three closest landfills to the City, there would be adequate remaining capacity to accept the 95.6 tons per day of cumulative solid waste. Additionally, based on the collective maximum daily permitted capacity of 45,297 tons per day, an average daily disposal intake of 19,291 tons per day, and an estimated remaining permitted total capacity of 142.67 million tons for all 10 Class III landfills serving the County, there would be adequate capacity to accept the cumulative solid waste should the three closest landfills be temporarily or permanently unable to accept waste collected within the City, including from the cumulative development areas. Furthermore, through annual updates to the CoIWMP, the county forecasts anticipated disposal needs and current capacities. The CoIWMP 2020 Annual Report concludes that there is enough capacity within permitted solid waste facilities to serve the disposal needs of the county through the 15-year planning period of 2020 through 2035.[18] The county will continually address landfill capacity through the preparation of Annual Reports, which provide sufficient lead time (15 years) to address potential future shortfalls in landfill capacity.

As with the Project, Citywide cumulative redevelopment that would occur under the 13 identified related projects would be required to comply with all applicable local and state regulations related to solid waste including the diversion requirements of the CALGreen code, AB 341, and AB 1826. Redevelopment would also be subject to the space allocation requirements established in ESMC Title 5, Chapters 2 and 5. As such, as with the Project, cumulative development would not conflict with or inhibit the City's or state's abilities to comply with AB 939, AB 939, AB 341, SB 1374, AB 1327, or AB 1826.

Based on the above, cumulative impacts related to solid waste would be less than significant and the Project's contribution to the impact would not be cumulatively considerable. No mitigation would be required.

6. Mitigation Measures

Project-level and cumulative impacts with regard to solid waste would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to solid waste would be less than significant.

8. References

California Department of Resources Recycling and Recovery, Disposal Reporting, Single-Year Countywide Origin Detail, website: https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Origin/CountywideDetail.

[18] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, page 6.*

California Department of Resources Recycling and Recovery, Mandatory Commercial Organics Recycling, website: www.calrecycle.ca.gov/recycle/commercial/organics/.

City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element. Adopted December 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362.

City of El Segundo, Department of Public Works, Trash and Recycling, website: https://www.elsegundo.org/government/departments/public-works/trash-recycling.

City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021.

IV. Environmental Impact Analysis

N. Utilities and Service Systems

4. Electric Power, Natural Gas, and Telecommunications Infrastructure

1. Introduction

This section describes the potential impacts upon electric power, natural gas, and telecommunications infrastructure of the El Segundo Downtown Specific Plan Update (Project), and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. This section focuses on the existing infrastructure serving the Project area and the potential for environmental impact to occur as a result of any physical improvements that may be necessary to accommodate the proposed Project. Potential impacts associated with energy demand and energy conservation policies are discussed in **Section IV.D, Energy**, of this Draft EIR. Other sources consulted are listed in **Section IV.N.4.8, References,** below.

Comments received in response to the Notice of Preparation (NOP) are summarized in **Table I-1, Summary of NOP Comments**, included in **Section I, Introduction**, of this Draft Environmental Impact Report (EIR). A copy of the NOP is included in **Appendix A.1** and the comment letters received in response to the NOP are included in **Appendix A.3** of this Draft EIR

2. Existing Conditions

a) Electricity

(1) Electricity Supplies

Electrical power is provided to the Project area by Southern California Edison (SCE). SCE delivers electricity to approximately 15 million people in 180 cities in 15 counties.[1] In 2021, SCE delivered approximately 57,096 gigawatt-hours (GWh) of electricity to end users; the commercial sector accounted for 52 percent of this demand (29,968 GWh), while the residential sector accounted

[1] *Southern California Edison, About Us: Who We Are, available at https://www.sce.com/about-us/who-we-are. Accessed September 7, 2023.*

for 40 percent (22,875 GWh) and the industrial sector accounted for 7 percent (4,253 GWh).[2] Of the total electricity delivered to SCE's customers in 2021, 31.4 percent was generated by eligible renewables (e.g., wind, solar, biomass/biowaste, small hydroelectric, and geothermal) and 11.5 percent was derived from other carbon-free sources (e.g., large hydroelectric and nuclear).[3] SCE also offers customers two "Green Rate" options to fund solar energy sources with either 50 percent or 100 percent of their electrical usage.

(2) Electric System Infrastructure

Electricity generated directly by SCE accounts for approximately 20 percent of the electricity it delivers to customers and is derived from the Palo Verde nuclear plant in Arizona, natural gas plants, hydroelectric plants, battery energy storage, solar rooftop installations, and a small diesel plant serving Catalina Island. The power supplied to SCE customers is distributed through a network of approximately 12,635 miles of transmission lines, 91,375 miles of distribution lines, 720,800 distribution transformers, and 2,959 substation transformers.[4] The Downtown area is urbanized and fully developed and land uses are supplied with electricity through existing distribution lines and transformers, electric poles, and meters throughout the Project area.

b) Natural Gas

(1) Natural Gas Supplies

The Southern California Gas Company (SoCalGas) provides natural gas resources to the City and most of Southern and Central California from the United States/Mexico border to the City of Visalia, California. SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[5] The availability of natural gas is based upon present conditions of gas supply and regulatory policies as the SoCalGas is under the jurisdiction of the California Public Utilities Commission (CPUC) and other federal regulatory agencies. Underground storage plays a vital role in balancing natural gas supply and demand and systemwide reliability, and is used to meet peak daily and seasonal demand, hedge against price volatility in commodity markets, and address emergency situations, including extreme weather and wildfires. Total gas delivered to SoCalGas' end users in 2021 was 2.44 billion cf; core residential land uses accounted for 25.4 percent (621 million cf) of this demand; core commercial land uses accounted for 8.6 percent (211 million cf); core industrial land uses accounted for 2.3 percent (55 million cf); and natural gas

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2 *U.S. Energy Information Administration, State Electricity Profiles, California, Table 3: Top Five Retailers of Electricity, with End Use Sectors, 2021, California, derived from Form EIA-861, Annual Electric Power Industry Report, available for download at https://www.eia.gov/electricity/state/california/state_tables.php. Accessed September 7, 2023.*

3 *Southern California Edison, 2021 Power Content Label, available at https://www.sce.com/sites/default/files/custom-files/Web%20files/2021%20Power%20Content%20Label.pdf. Accessed September 7, 2023.*

4 *Southern California Edison, About Us: Who We Are, available at https://www.sce.com/about-us/who-we-are. Accessed September 7, 2023.*

5 *California Gas and Electric Utilities, 2022 California Gas Report, page 135.*

vehicles accounted for 1.6 percent (40 million cf). The remaining demand was associated with noncore end uses (e.g., large commercial and industrial land uses, electric generation, etc.), which accounted for 45.9 percent (1.12 billion cf) of gas delivered by SoCalGas in 2021.[6]

As a result of modest economic growth and the forecasted energy efficiency and fuel substitution created by revised Title 24 Codes and Standards and renewable energy goals that impact gas-fired electricity, SoCalGas projects total gas demand to decline at an annual rate of 1.5 percent from 2022 to 2035. Demand associated with all individual market sectors comprising total gas demand (e.g., residential, core commercial, core industrial, etc.) are expected to decline over this period with the exception of the natural gas vehicles market, which is expected to grow 2.1 percent over the forecast horizon as a result of federal, state, and local incentives and regulations encouraging the purchase and operation of alternative fuel vehicles and the increased use of renewable natural gas (i.e., biogas).[7] In addition, SoCalGas makes available to its customers energy efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption.

(2) Natural Gas System Infrastructure

Natural gas is supplied to the Southern California region through a system of interstate pipelines. SoCalGas is the principal distributor of natural gas in Southern California with a distribution network composed of approximately 51,070 miles of gas mains across an approximate 20,000-square-mile service territory. Current capacities in the interstate pipeline system can provide approximately 3,225 million cubic feet (cf) of gas per day; gas supply available to SoCalGas from California sources is approximately 210 million cf per day comprised of 60 million cf from Line 85 Zone and 150 million cf from the Coastal Zone; for a total capacity available of 3,435 million cf per day.[8] SoCalGas owns and operates four natural gas storage facilities with a combined theoretical inventory of over 130 billion cf.[9]

SoCalGas provides natural gas resources to the City through existing gas mains located under the streets and public rights-of-way. Land uses within the Downtown area receive natural gas through existing gas mains, onsite distribution lines, and meters. Natural gas services are provided in accordance with SoCalGas's policies and extension rules on file with the CPUC at the time contractual agreements are made.

c) Telecommunications

A wide array of products and telecommunication services for residential and commercial uses within the City are available, including internet services, wireless services, television technology utilizing digital fiber optic technology, and satellite technology. AT&T and Spectrum Communications provide telecommunications, cable, and internet services within the Specific

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6 *California Gas and Electric Utilities, 2022 California Gas Report, Table 31: Annual Gas Supply and Sendout, Recorded Years 2017 to 2021, page 184.*

7 *California Gas and Electric Utilities, 2022 California Gas Report, pages 115 to 132.*

8 *California Gas and Electric Utilities, 2022 California Gas Report, page 185.*

9 *California Gas and Electric Utilities, 2022 California Gas Report, page 144.*

Plan Update area. Communication systems located throughout the Specific Plan Update area include underground fiber optic cable, telephone transmission lines (overhead and underground), and cellular towers owned or leased by telecommunications service providers. A variety of telecommunication facilities exist along roadways and other areas around the City. The majority of landline telephone facilities are located in county- or city-owned rights-of-way and on private easements. Telecommunications lines are either copper wire or fiber optic cable and are routed overhead on utility poles and underground. In addition to landline service, communication facilities have been constructed throughout the Specific Plan Update area for cellular telephone service. Cellular service is available, to varying degrees, throughout Downtown.

Telecommunication companies are regulated by California Public Utilities Commission (CPUC). All cellular towers and equipment are managed by private telecommunications service providers under the jurisdiction of the Federal Communications Commission (FCC).

3. Relevant Plans, Policies, and Ordinances

a) Federal

(1) United States Department of Energy (Energy Policy Act of 2005)

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves, and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority.

b) State

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals, but have different roles and responsibilities in managing the state's energy needs. The majority of state regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to **Section IV.D. Energy**, of this Draft EIR. There are, however, regulations pertaining to infrastructure. These are discussed further below.

(1) California Independent System Operator

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

(2) California Public Utilities Commission

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUCs jurisdiction. The Digital Infrastructure and Video Competition Act of 2006 (DIVCA) established the CPUC as the sole cable/video TV franchising authority in the State of California. DIVCA took effect January 1, 2007.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the state Senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities.

(3) California Energy Commission

The CEC is a planning agency which provides guidance on setting the state's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources, and permitting thermal power plants 50 megawatts and larger. The CEC also has regulatory specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured.

(4) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The latest iteration of the plan is the 2023 Integrated Energy Policy Report (2023 IEPR).[10] The focus of the 2023 IEPR is to identify barriers and solutions to accelerate the connection (including interconnection, energization, and associated system upgrades) of clean energy technologies with the electric grid. The report considers both transmission and distribution systems and includes a new 15-year electricity and gas demand forecast.

(5) Senate Bill 649

Senate Bill 649 (SB 649) requires small cellular installations be on vertical infrastructure and on property outside of public rights-of-way. The installation is required to comply with all applicable federal, state, and local health and safety regulations. Additionally, cellular equipment that is no longer in use is required to be removed at no cost to the City.

c) Regional and Local

(1) City of El Segundo General Plan

The policies outlined in the City of El Segundo General Plan Land Use Element and Conservation Element are considered relevant to the Project, as described below:[11]

Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.

Policy LU7-2.3: All new development shall place utilities underground.

Policy CN2-7: Require new construction and development to incorporate the principles and practices of sound landscape design and management, particularly those conserving water and energy.

[10] *California Energy Commission, 2023 Integrated Energy Policy Report, available at https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2023-integrated-energy-policy-report. Accessed September 13, 2023.*

[11] *City of El Segundo, City of El Segundo General Plan, Chapter 7, Conservation Element, adopted December 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=370. Accessed March 2023; and City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element, adopted December 1992, website: https://www.elsegundo.org/Home/ShowDocument?id=362. Accessed March 2023.*

Policy CN2-8: Encourage the retrofitting of existing landscapes to incorporate the principles and practices of sound landscape design and management, particularly those conserving water and energy.

(2) Proposed Specific Plan

Standards and guidelines set forth in the Specific Plan Update's Development Standards that are relevant for the topic of energy and telecommunications infrastructure are contained within the Public Realm – Placemaking and Beautification Chapter and primarily relate to pedestrian-scale lighting. These include the following:

- Energy-efficient lighting (lighting from renewable sources and energy-saving devices, such as light sensors) is required. Where feasible, use warm white lighting source types.
- Electrical service for seasonal/event lighting in all streetlights and at street trees shall be provided and all public plazas and at key intersections along Main Street and Grand Avenue.

4. Environmental Impacts

a) Thresholds of Significance

The significance criteria used to evaluate project impacts to utilities and service systems are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the *State CEQA Guidelines*, a significant impact related to utilities and service systems would occur if a project would:

Threshold (a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.***

b) Analysis of Project Impacts

Threshold (a): ***Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?***

As detailed in **Section IV.D, Energy**, the estimated electrical demand associated with potential build out under the Specific Plan Update would represent an insignificant percentage of SCE's projected and planned for annual sales. Existing transmission and distribution are adequate to meet current and future demands of land uses within Downtown.[12] SCE routinely plans capacity additions and changes at existing and new facilities as needed to supply area load. Future

[12] *City of El Segundo, Downtown Specific Plan Update, May 2023, page 5-6.*

development's electrical consumption would be part of the total load growth forecast for SCE's service area and would be accounted for in the planned growth of their power system.

Based on the small fraction of total natural gas consumption for the region that future development under the Specific Plan Update would represent (see **Section IV.D, Energy**) and the continued sufficient supply of natural gas through SoCalGas' ongoing long-range planning efforts, existing and planned natural gas supplies and regional distribution pipeline infrastructure would be sufficient to meet the demand for natural gas that would result from future development under the Specific Plan Update. SoCalGas has confirmed that there are facilities in the area and service would be provided in accordance with SoCalGas' policies and extension rules on file with the CPUC at the time contractual arrangements are made on a project-by-project basis.[13]

Furthermore, with regard to electricity and natural gas, future development projects would be subject to statewide mandatory energy requirements as outlined in CCR Title 24, Part 6. The CCR Title 24, Part 11, contains additional energy measures that are applicable to residential and non-residential projects under CALGreen. Compliance with modern efficiency standards would likely mean that future development would require less electricity and natural gas than other buildings in the surrounding area. For these reasons, future development that could occur under the Specific Plan Update is not expected to require substantial amounts of energy such that new or expanded electrical or natural gas infrastructure related to supply generation, storage, or regional distribution would be required.

Existing telecommunications facilities and infrastructure belonging to AT&T and Spectrum Communications currently exists in the vicinity of the Specific Plan Update area. Telecommunication services are provided by private companies, the selection of which is at the discretion of project applicants and/or their successors on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review.

Although new supplies and/or regional distribution and transmission infrastructure upgrades would not be required to support future development within the Specific Plan Update area, local upgrades, including onsite distribution and minor offsite connections would be required for future redevelopment projects. Any required upgrades are anticipated to be limited to lateral connections to development sites and not any centralized facilities. Upgrades would be coordinated with appropriate service providers to minimize disruptions to service and would be completed by either trenchless technology or open trenching to the depth of the underground utilities. Impacts from such construction activities are part of typical site development and would not be substantial based on their temporary and localized nature both onsite and within existing rights-of-way or public easements that have been previously disturbed. Potential environmental impacts associated with trenching for utilities, including areas of temporary earth disturbance and the operation of construction equipment, are assessed throughout this Draft EIR. Additionally, future development that would be accommodated by the Specific Plan Update would be required to comply with all regulatory requirements and mitigation measures outlined within this draft EIR for the purposes of mitigating impacts associated with construction activities, including utility

[13] *City of El Segundo, Downtown Specific Plan Update, December 2023, page 5-6.*

installation, and the use of heavy machinery. No adverse physical effects beyond those already disclosed in this Draft EIR would occur as a result of implementation of the Project's proposed utility system connections.

Based on the above, the relocation or construction of offsite generation, storage, or regional distribution infrastructure would not be required and the construction of new onsite dry utility facilities and connection to existing local distribution infrastructure would not result in significant environmental effects. Accordingly, impacts would be less than significant and no mitigation would be required.

5. Cumulative Impact Analysis

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. As detailed in **Table II-1, List of Related Projects,** in **Section II, Environmental Setting**, of this EIR, there are 13 related projects in the City that would cumulatively increase the demand for electricity, natural gas, and telecommunications infrastructure capacity.

As detailed in the cumulative analysis presented in **Section IV.D, Energy**, of this EIR, the projected electrical and natural gas demands of cumulative development within SCE's and SoCalGas' service areas, including within the City, has been considered and accounted for in long-range planning efforts; and additional sources of electrical or natural gas power would not be required. As such, infrastructure associated with generation and regional transmission beyond those already anticipated and planned for by SCE and SoCalGas would not be required as a result of cumulative development within the City.

Locally, as with future development under the Project, providers of both electrical and natural gas energy and telecommunications services would coordinate with the applicants of related projects to provide any necessary infrastructure improvements and connections specific to each development project. The City of El Segundo, including the Specific Plan Update area, is built-out and upgrades in electrical power, natural gas, and telecommunication capabilities are anticipated primarily due to development in the form of the revitalization of outdated or underserved areas, and redevelopment of specific properties that will increase density and require more sophisticated technology, such as redevelopment associated with the Project, related projects, and future growth. However, such upgrades would generally be confined to the lateral connections to the individual project sites and not any centralized facilities. Upgrades to centralized power, natural gas, and telecommunication facilities would be determined by each of the power, gas, and telecommunications providers, as build-out continues within the region. Individual projects would be required to provide for specific project needs. As a result, cumulative impacts associated with upgrades of electric, natural gas, and telecommunication facilities would not be significant. As such, impacts to electric power, natural gas, and telecommunication services would not be cumulatively considerable.

6. Mitigation Measures

Project-level and cumulative impacts with regard to dry utilities would be less than significant. Therefore, no mitigation measures are required.

7. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to dry utilities would be less than significant.

8. References

California Energy Commission, 2018 Integrated Energy Policy Report Updated, Volume II, February 2019.

California Energy Commission, California Energy Demand 2022-2035 Planning Forecast – LSE and BA Planning Forecast Tables, Corrected March 30, 2023, Form 1.1c: Electricity Deliveries to End Users by Agency (GWh).

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City of El Segundo, City of El Segundo General Plan, Chapter 3, Land Use Element, adopted December 1992.

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Southern California Edison, About Us: Who We Are.

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V. Other CEQA Considerations

This chapter of the Environmental Impact Report (EIR) for the El Segundo Downtown Specific Plan Update (Project) has been prepared in furtherance of the content requirements set forth in the *California Environmental Quality Act (CEQA) Guidelines Section* 15126.2, Section 15126.4(a)(1)(d), and Section 15128. As such, this chapter discusses the following:

- Significant Environmental Effects Which Cannot be Avoided (Section V.1)
- Significant Irreversible Environmental Changes (Section V.2)
- Growth Inducing Impacts (Section V.3)
- Significant Effects of Mitigation Measures (Section V.4)
- Effects Not Found to be Significant (Section V.5)

1. Significant Environmental Effects Which Cannot be Avoided

Section 15126.2(c) of the State CEQA Guidelines requires than an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(c) states the following:

> *Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented. Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

Implementation of the mitigation measures identified in Chapter IV, Environmental Analysis, of this Draft EIR would reduce all potentially significant impacts to below a level of significance. Therefore, there would be no significant environmental effects which cannot be avoided associated with implementation of the Specific Plan Update.

2. Significant Irreversible Environmental Changes

Section 15126.2(d) of the *State CEQA Guidelines* require an EIR to address any significant irreversible environmental changes that would result from a proposed project should it be implemented. Specifically, Section 15126.2(d) states the following:

> *Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a*

> *large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

As such, a project would generally result in significant irreversible environmental changes if:

- The project would involve a large commitment of non-renewable resources;
- The project would commit future generation of people to similar uses;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involved the wasteful or inefficient use of energy).

Determining whether a proposed project could result in significant and irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

a) Large Commitment of Non-Renewable Resources

A non-renewable resource is a natural resource that cannot be readily replaced by natural means at a pace quick enough to keep up with consumption. Examples of non-renewable resources that would be consumed by future development within the Specific Plan Update include building materials (lumber, steel, etc.) and petroleum fuels during construction activities; as well as water and sources of energy (petroleum, natural gas, electricity) required for development operations.

(1) Construction

Future development would be constructed with durable materials with a significant lifespan, such as cast in place concrete and precast concrete, which would improve building longevity. As such, even though construction would result in the commitment of building materials, the materials are not expected to require replacement during the Project's estimated operational lifespan. Furthermore, per California Green Building Standards Code (CALGreen), 65 percent of all demolition and construction materials must be recycled. This regulation would ensure that portions of the existing materials on site are reused. Once future development is demolished, this regulation would also ensure that a majority of the materials used are recycled.

In addition, as discussed in greater detail in **Section IV.D, Energy**, of this Draft EIR, consumption of transportation fuel during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and the contractor would be required to comply with the California Air Resource Board (CARB)'s In-

Use Off-Road Diesel Fueled Fleets Regulation that restricts the idling of heavy-duty diesel motor vehicles and governs the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, per applicable regulatory requirements, the Project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct the Project. Furthermore, construction schedules and processes are already designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it.

Based on the above, the use of non-renewable resources during construction of future projects developed pursuant to the Specific Plan Update would not represent a large commitment of such resources.

(2) Operation

While existing uses within the Downtown area generate some demand for water, electricity, natural gas, and petroleum fuels (gasoline and diesel), the proposed Project would increase this demand due to intensification of the land uses that would be allowed under the Specific Plan Update. As discussed in greater detail in **Section IV.N.1, Utilities—Water**, and **Section IV.D, Energy**, of this Draft EIR, the projected demand for such resources would represent negligible percentages of available supplies and would not exceed applicable provider capabilities. Furthermore, future development that could occur pursuant to the Specific Plan Update would be subject to the more-stringent regulations of the current CALGreen code than the existing land uses. CALGreen requires implementation of water and energy efficient fixtures and building materials into the design of new construction projects. Additionally, the 2022 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance. The standards are updated every three years and each iteration is more energy efficient than the previous standards.

In addition to the above considerations, state and local laws and regulations would further reduce the Project's use of non-renewable resources over time. Specifically, electricity consumed at the Project Site would be increasingly sourced from renewable energy, pursuant to Senate Bill 100. Senate Bill 100, which passed in 2018, states that 44 percent of the total electricity sold to retail customers in California per year must be secured from qualifying renewable energy sources by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. SB 100 also sets forth a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of the retail sales of electricity to California and requires that achieving 100 percent zero-carbon electricity does not increase carbon emissions elsewhere in the western grid or is not fulfilled through resource shuffling. As such, the Project's consumption of non-renewable energy is anticipated to significantly decrease over time, as Senate Bill 100 is implemented statewide and overall non-renewable energy consumption decreases.

Similarly, over the lifetime of future development, the fuel efficiency of vehicles is expected to increase as a result of numerous regulations in place that require and encourage increased fuel efficiency, such as efforts to accelerate the number of plug-in hybrids and zero-emissions vehicles in California, and increasingly stringent emissions standards. As a result, the amount of petroleum consumed as a result of vehicular trips to and from the Downtown area during operation of future development would be expected to correspondingly decrease over time due to improvements in the fuel economies of the fleet of vehicles used to access the area. Furthermore, both the state and the City have policies in place to support decreased use of personal vehicles, to be replaced with alternative modes such as transit, walking, and biking policies which are supported by the Specific Plan Update's multimodal mobility planning principles and pedestrian network improvements. As such planning principles and improvements are carried out, the number of vehicles traveling to and from the site may decrease over time.

In conclusion, although operation of redevelopment that would occur pursuant to the Specific Plan Update would require the consumption of non-renewable resources at a higher amount than under existing conditions, the consumption of such resources would be at a more efficient rate and would be expected to decrease over time as more stringent regulations and policies are issued. As such, redevelopment would be expected to result in a lower per-capita demand for resources as compared to existing conditions. Redevelopment would not include new land uses that require a long-term commitment of large amounts of resources (e.g., power plants, etc.).

Land uses within urban centers, such as the Downtown area, tend to be redeveloped over time, especially when the property is underutilized and could be put to a more efficient use that better addresses the needs of the community. The redevelopment of underutilized sites would result in changes to the current land uses in a manner that is consistent with the City's General Plan goals and policies (see **Section IV.H, Land Use and Planning**) and with the City's Climate Action Plan (see **Section IV.F, Greenhouse Gas Emissions**). Such development is commonplace and encouraged in areas near urban centers and transit nodes and would not result in a large commitment of non-renewable resources such that removal or non-use thereafter would be unlikely.

b) Commitment of Future Uses

The Downtown area is an urban environment fully-developed with existing commercial, residential, and office land uses. While the Specific Plan Update would amend the land use designations and zoning on parcels within the Specific Plan Update area, the amendments would merely allow for increases in land uses that currently existing within the Project area (retail/restaurant, office, medical office, and residential). No new land uses that are not allowed under existing land use designations and zoning would be permitted following implementation of the Specific Plan Update.

Redevelopment of existing uses would be an increase over the existing condition; however, because the proposed Specific Plan Update would allow redevelopment within a fully developed and urbanized portion of the City, it would not commit future generations to new urban land uses. As detailed in **Section IV.H, Land Use and Planning**, of this Draft EIR, proposed Specific Plan

Update was prepared to provide the essential relationship between the policies of the El Segundo General Plan and actual development of the Specific Plan area. By functioning as a regulatory document, the Specific Plan Update would provide a means of implementing the City of El Segundo's General Plan. Increasing the density of co-located commercial, office, and residential land uses within urban centers and near transit nodes is commonplace and encouraged, and would not result in primary and secondary impacts that would generally commit future generations of people to similar uses.

c) Irreversible Damage from Environmental Accidents

The Specific Plan Update does not propose any specific development. However, potential future development that could occur within the Downtown area pursuant to the Specific Plan Update could result in environmental accidents. Specifically, construction and operation of future development could release hazardous materials into the environment, thereby causing damage to soil and groundwater or people exposed to such contaminated soil and groundwater.

(1) Construction

Implementation of the Project would introduce new retail and restaurant uses, office uses, medical office uses, and residential units. Construction of future projects in the Specific Plan area could involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. In addition, the soils in the Specific Plan area may contain contamination. Construction activities involving disturbance of contaminated soils could potentially create a significant hazard for construction workers and adjacent properties through upset or accident conditions. Redevelopment, renovation, and demolition of structures built before 1978 (for LBPs) and 1989 (for ACMs) could potentially release asbestos or lead into the atmosphere. However, compliance with federal, State, and local regulations, would reduce this impact to a less than significant level. Based on the above, construction of future development proposed pursuant to the Specific Plan Update are not anticipated to result in irreversible damage due to environmental accidents.

(2) Operation

Operation of the Project would include retail and restaurant uses, office uses, medical office uses, and residential units. Such uses would include the use and storage of common hazardous materials similarly used in Project area residences and businesses today, with similar risk of upset or accident conditions that would create health or safety risks. Compliance with warning labels and storage recommendations from individual manufacturers would ensure people in the Project area would not be exposed to unusual or significant risks from hazardous materials. Furthermore, businesses that use, store, or transport large quantities of hazardous materials are required to comply with health and safety, and environmental protection laws and regulations previously described, which require businesses handling or storing certain amounts of hazardous materials to prepare a hazardous materials business plan. The hazardous materials plan must include a Safety Data Sheet (SDS) for each hazardous material used or stored. To accomplish this, and to otherwise provide a safe and healthy environment, businesses that use hazardous materials must

implement health and safety policies and procedures. In addition, future development in the Project area would be required to conform with applicable environmental review processes and environmental regulations related to hazardous materials storage, use and transport.

As discussed in **Section IV.G, Hazards and Hazardous Materials**, of this Draft EIR, DTSC's EnviroStor Database and the GeoTracker Database were searched on August 30, 2023 for listed occurrences on properties within the Specific Plan area. DTSC's EnviroStor Database identified 12 "Active" sites in the Project area. GeoTracker Database identified two "Open" cleanup sites in the Project area and five cases that were completed and closed. Additionally, the El Segundo Chevron Refinery is immediately to the south, across El Segundo Boulevard.

Existing sites on the DTSC's EnviroStor Database list within the Specific Plan Update area would not be directly affected by implementation of the Specific Plan Update since the Plan does not directly involve development activity. Plan regulations could lead to the redevelopment of a site on the DTSC's EnviroStor Database list. However, any project that involved these properties would require additional CEQA review and would be evaluated for the impact to the environment from known contamination, based on the nature of the proposed project. Any future activities at DTSC's EnviroStor Database list sites within Specific Plan Update will be subject to site-specific mitigation protocols administered by DTSC and other jurisdictional agencies in conformance with federal, State, regional, and local regulations.

The Specific Plan area is located within the El Segundo oil field, which is an active oil drilling field.[1] There is one plugged oil and gas well located within the Specific Plan area, near the intersection of Main Street and El Segundo Boulevard. Two active oil and gas wells are located approximately 0.5 miles west of the Specific Plan area. Therefore, there is the potential for unidentified soil, soil vapor, and/or groundwater contamination to be present on the Project Site. Thus, construction activity that disturbs soil or groundwater could have the potential to result in the release of hazardous materials, which could adversely affect construction workers and/or neighboring properties. In addition, operation of redeveloped properties with known impacts remaining onsite have the potential to adversely affect onsite occupants. To address such possible concerns, it is common for a Phase I Environmental Site Assessment (ESA) to be conducted prior to excavation and construction activity. The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs) associated with soil and groundwater contamination. Based on the results of the Phase I ESA, a Phase II ESA (subsurface investigation) may be warranted to determine whether any identified RECs involve contamination exceeding regulatory action levels. If contamination exceeding action levels is identified, additional subsurface investigations and/or remediation with regulatory oversight from an appropriate agency may be warranted.

The process described above would normally identify, and as necessary, assess and remediate soil, soil vapor, and/or groundwater contamination. Remediation of contamination exceeding regulatory action levels would address potential impacts during ground disturbance and improve conditions in the long term. However, because there is not a specific legal requirement for a Phase I ESA for all excavation or construction, there is the potential for soil, soil vapor, and/or

[1] *California Department of Conservation, Well Finder, website: https://maps.conservation.ca.gov/doggr/wellfinder/. Accessed March 2023.*

groundwater contamination to go undetected. Thus, future grading and construction would have the potential to result in exposure of Project area construction workers and occupants of neighboring properties, and onsite occupants during operation to releases of hazardous materials. With the incorporation of **Mitigation Measure (MM) HAZ-1**, construction and operation impacts relating to sites on DTSC's list, and unidentified hazardous materials would be reduced to a level of less than significant

Based on the above, operation of future development proposed pursuant to the Specific Plan Update are not anticipated to result in irreversible damage due to environmental accidents.

d) Unjustified Consumption of Resources

While the Specific Plan Update would allow for redevelopment that would result in increased resource consumption during construction and operation, it would also result in some benefits related to long-term resource consumption in the region. As demonstrated in **Section IV.J, Population and Housing**, of this Draft EIR, growth in population, housing, and employment is expected to occur in the City, in Los Angeles County, and throughout the southern California region into the foreseeable future. Redevelopment under the Specific Plan Update would generate growth that falls within regional growth projections and would locate this growth on infill sites within walking distance of a wide range of services, employment opportunities, commercial uses, and existing residential land uses. Such increased density within urban cores in proximity to services and transit is consistent with state, regional, and City goals and policies to reduce urban sprawl. Additionally, the Project would provide additional housing in an employment-rich urban center, thereby facilitating a more balanced jobs-housing profile.

The proposed Project would help accommodate growth within existing developed areas, as opposed to accommodating growth through development in previously undeveloped areas. The latter development pattern generally results in permanent loss of naturalized lands and open space, as well as increased fossil fuel consumption attributable to longer commuting distances and lack of transit options. While the Project would result in some irretrievable commitment of non-renewable resources, it would also help accommodate growth in a manner that would reduce irreversible environmental changes in the region. Additionally, the irretrievable commitment of resources attributable to the Project would not be considered unusual when compared to typical urban infill development of the same size and scope. As detailed in **Section IV.D, Energy**, and **Section IV.N.3, Utilities—Solid Waste**, of this Draft EIR, due to the stringent regulations and controls related to the consumption and use of energy; including mandatory recycling of construction and demolition materials, mandatory recycling of recyclables and green waste during operation, installation of energy efficient fixtures designed to reduce the consumption of water, electricity, and natural gas, and fuel efficiency vehicle standards; the consumption of energy resources by redevelopment within the Downtown area would not be considered wasteful or inefficient. For these reasons, the consumption of resources attributable to redevelopment that could occur under the Specific Plan Update would not be considered unjustified.

3. Growth-Inducing Impacts

The *State CEQA Guidelines* require that an EIR evaluate the growth-inducing impacts of a proposed action. Specifically, *CEQA Guidelines* Section 15126.2[d] state:

> *Discuss the way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

A project can have direct and/or indirect growth-inducement potential. New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. A project could indirectly induce growth by reducing or removing barriers to growth or by creating a condition that attracts additional population or new economic activity.

The Specific Plan Update does not propose any specific development and would, accordingly, have no direct growth-inducing impacts. However, the Project would change the land use designations and zoning of eight parcels, which would allow for increases of up to 130,000 square-feet of retail and restaurant uses, 200,000 square-feet of office uses, 24,000 square-feet of medical office uses, and 300 residential units. The Project's allowance of increased development would be an indirect form of growth. However, under CEQA, growth is not considered necessarily detrimental or beneficial. As detailed in **Section IV.J, Population and Housing**, of this Draft EIR, the additional employment and housing that could occur under the Specific Plan Update would be within SCAG's long-term planning projections for the City and the Specific Plan Update includes provisions for new infrastructure, transportation and mobility, public facilities, and comprehensive long-term planning to ensure that the additional population growth that could occur within the Downtown area would be accommodated. In addition, the allowance of additional housing units would be growth-accommodating rather than growth-inducing, and given that the City's vacancy rate (4.4 percent for 2023) is lower than Los Angeles (5.2 percent for 2023),[2] the additional housing units could help meet the City's share of the region's housing needs.

Furthermore, Downtown El Segundo is an urbanized community with road, water, sewer, storm drain, and other infrastructure in place. Development pursuant to the Specific Plan Update would

[2] *California Department of Finance, Demographics Research Unit, Report E-5, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2021-2023 with 2020 Benchmark, May 1, 2023.*

occur within the boundaries of Downtown El Segundo and would not require and does not propose the extension of roads or other infrastructure, utilities, or public services into previously-undeveloped areas. The Specific Plan Update would encourage development around existing infrastructure to ensure that infrastructure is used efficiently and in a manner that reduces the environmental impacts of development. As detailed in the analysis of the Project's impacts with regard to public services and utilities and service systems (see **Sections IV.K.1** through **IV.K.5** and **Sections IV.N.1** through **IV.N.4**, respectively), implementation of the Specific Plan Update would not require expansion of existing or construction of new regional infrastructure. In addition, given the developed nature of the surrounding area, any required upgrades or expansion of local infrastructure would support development consistent with the Specific Plan Update and would not accommodate or induce growth beyond what is proposed.

Because potential growth under the Specific Plan Update would involve high density, mixed-use infill development in a transit accessible area, as shown in **Section IV.L, Transportation**, of this Draft EIR, implementation of the Project would result in a lower per capita VMT and lower total VMT than baseline 2023 conditions for the Project Area and the City. Mixed-use, infill development is also generally understood to result in lower per capita consumption of energy resources as older, less-efficient, and less-sustainable features, fixtures, equipment, and design/materials are replaced with those that are designed for efficiency and sustainability consistent with increasingly stringent building and energy code requirements and regulations. Further, concentrating development in the urbanized Downtown area would generally avoid impacts to visual, agricultural, biological, and mineral resources due to the lack of such resources within the Project area.

Overall, the Project would be consistent with local and regional policies to reduce urban sprawl, efficiently use existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. Ultimately, the Project would not induce growth beyond what is anticipated to result from the Project itself which, as presented throughout **Chapter IV** of this Draft EIR, would not result in significant environmental impacts. Therefore, the Specific Plan Update's growth-inducing impacts would be less than significant.

4. Significant Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the *State CEQA Guidelines* states that "…*if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but, in less detail, than the significant effects of the project as proposed*." With regard to this section of the *State CEQA Guidelines*, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

a) Cultural Resources

Mitigation Measure **MM CUL-1** would require applicants of future projects proposed on properties identified in the Historic Report (**Appendix D.1**) as potential individual resources or as contributing to a potential historic district to prepare Historical Resources Assessment Reports (HRAR) if additional documentation of potential impacts on historic resources and mitigation measures is required by the City for future development under the Specific Plan Update. The HRAR would include evaluation of future project sites and preparation of a Memorandum presenting the findings and conclusions of the evaluation. Mitigation measure **CUL-2** would require applicants of development projects proposed for the Specific Plan area to prepare and implement a Worker Environmental Awareness Program (WEAP). All construction personnel will be appropriately informed of required responses to unanticipated cultural resources, should these be encountered. Additionally, **MM CUL-3** requires that all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find. These mitigation measures represent procedural actions and have been designed to prevent environmental impacts. Accordingly, implementation of **MM CUL-1** and **MM CUL-2** would not result in adverse secondary impacts.

b) Geology and Soils

Mitigation Measure **MM GEO-1** would require applicants of development projects proposed for the Specific Plan area to retain a qualified paleontologist meeting Society of Vertebrate Paleontology (SVP) Standards to prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for their projects. In accordance with **MM GEO-1**, the PRIMP would be consistent with the Society of Vertebrate Paleontology guidelines and would outline the requirements for training and monitoring that must be implemented, as well as the procedures in the event that paleontological resources are encountered. Mitigation Measure **MM GEO-1** would ensure that any potential impacts related to paleontological resources would be reduced to a less than significant level. This mitigation measure represents a procedural action and has been designed to prevent environmental impacts. Accordingly, implementation of **MM GEO-1** would not result in adverse secondary impacts.

c) Hazards and Hazardous Materials

Mitigation Measure **MM HAZ-1** would require a Phase I Environmental Site Assessment (ESA) to be conducted prior to excavation and construction activity. The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs) associated with soil and groundwater contamination. Based on the results of the Phase I ESA, a Phase II ESA (subsurface investigation) may be warranted to determine whether any identified RECs involve contamination exceeding regulatory action levels. If contamination exceeding action levels is identified, additional subsurface investigations and/or remediation with regulatory oversight from an appropriate agency may be warranted. Depending on the level and type of contamination, the oversight agency could be the City, County of Los Angeles, RWQCB, DTSC, or USEPA. Remedial actions would typically involve removal and proper disposal, capping, or treatment of

contaminated soil or groundwater, construction of vapor barriers, or other engineering controls. Accordingly, implementation of **MM HAZ-1** would not result in adverse secondary impacts.

d) Public Services-Fire Protection

Mitigation Measure **MM PS-1** would require emergency access be maintained within the Specific Plan area during construction through marked emergency access points approved by the ESFD, if there are partial closures to streets within the Specific Plan area, flagmen would be used to facilitate the traffic flow until construction is complete; and future construction within the Specific Plan area would be required to prepare a Construction Management Plan that would address traffic and access control during construction. Accordingly, implementation of **MM PS-1** would not result in adverse secondary impacts.

e) Public Services-Police Protection

Mitigation Measure **MM PS-1** would require emergency access be maintained within the Specific Plan area during construction through marked emergency access points approved by the ESFD, if there are partial closures to streets within the Specific Plan area, flagmen would be used to facilitate the traffic flow until construction is complete; and future construction within the Specific Plan area would be required to prepare a Construction Management Plan that would address traffic and access control during construction. Accordingly, implementation of **MM PS-1** would not result in adverse secondary impacts.

f) Tribal Cultural Resources

Mitigation Measure **MM TCR-1** would require applicants of development projects proposed for the Specific Plan area to retain a qualified Native American Monitor from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading and excavation activities for their projects. **MM TCR-1** outlines the appropriate protections, documentation, and treatment of tribal cultural resources in the event of their discovery during development under the Specific Plan Update. This mitigation measure represents a procedural action and has been designed to prevent environmental impacts. Accordingly, implementation of **MM TCR-1** would not result in adverse secondary impacts.

5. Effects Not Found to be Significant

Section 15128 of the *State CEQA Guidelines* states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR.

An Initial Study was prepared for the Project and is included in **Appendix A.2** of the Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or not analyzed further in this Draft EIR. The City of El Segundo determined through the Initial Study that the Project would not have the potential to cause significant impacts to aesthetics (scenic vistas and damage of scenic resources);

agriculture and forestry; biological resources; geology and soils (rupture of an earthquake fault line, seismic ground shaking, seismic ground failure, landslides, erosion/loss of topsoil, unstable soil, expansive soil, and septic tanks); hazards and hazardous materials (routine transport and wildland fires); hydrology and water quality; land use and planning (community division); mineral resources; noise (airport/airstrip); transportation/traffic (design features and emergency access); and wildfire. For further discussion of these issues and more detailed evaluation of potential impacts, refer to the Project's Initial Study, provided in **Appendix A.2** of this Draft EIR.

a) Aesthetics

The Project would not have a substantial adverse effect on a scenic vista.

The Specific Plan Update in and of itself does not propose or authorize any projects or development plan. In general, the purpose of the Specific Plan is to provide the opportunity to implement the vision of the community for the Downtown, while enhancing the quality small town environment for the residents.

Future development would be required to adhere to all city design guidelines and standards including the Zoning Ordinance, General Plan policies, and the Downtown Specific Plan development guidelines for a particular area. The Specific Plan Update proposes amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels from Downtown Commercial to Downtown Specific Plan. The Specific Plan Update would also amend the City's zoning map to change the zoning on eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP).

No projects are proposed in Open Space designated areas. All future projects would be developed on sites that are designated as Downtown Specific Plan (DSP), which would allow residential, office, medical office, retail and restaurant uses. No areas currently designated as open space would be converted to urban uses and no development would be permitted to encroach on open space.

All future projects would be treated as individual projects and may be subject to specific environmental analysis. Nevertheless, there are no policies in the Specific Plan Update which either permit or promote development in areas that aren't currently developed with existing uses. There are no policies or programs in the Specific Plan Update that would directly affect scenic vistas nor any that would degrade the visual character of the City. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

There are no state scenic highways in the vicinity of El Segundo, including the Specific Plan area. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

b) Agriculture and Forestry Resources

The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

The Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

The Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

The Project would not result in the loss of forest land or conversion of forest land to non-forest use.

The Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The Specific Plan Update does not propose or authorize any development. The Specific Plan Update would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No land within the City of El Segundo, including the Specific Plan area, is subject to the Williamson Act contract. As mentioned above, the City of El Segundo, including the Specific Plan area, does not have any land that is designated or zoned for forest use or timber production. Additionally, there are no nearby agricultural sites that would be affected by development within El Segundo, including the Specific Plan area. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

c) Biological Resources

The Project would not 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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

The Project would not 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.

The Project would not 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.

The Specific Plan area is located in urbanized area that have been developed previously. Inasmuch as the Specific Plan Update could indirectly result in commercial and residential development and improvement, the project could result in increased density in residential, commercial, and mixed-use areas of the City. However, the City is largely built-out and the City's General Plan Land Use Element and zoning code focuses growth into urbanized portions of the City.

No development is proposed on or near the areas mapped as wetlands. Because the areas where potential development may occur have already been disturbed through urban development, no significant changes are anticipated in the diversity or number of species of plants or animals, or in the deterioration of existing wildlife habitat. No riparian habitat, wetlands, wildlife corridors or nurseries would be impacted.

Existing applicable federal, state, and/or local policies would prevent development in areas that support sensitive or special status species, federally protected wetlands, or migration corridors.

Accordingly, adoption of the Specific Plan Update would have a less than significant impact on biological resources, including candidate, sensitive, or special-status species; riparian habitat or other sensitive natural community; federally protected wetlands a (including, but not limited to marsh, vernal pool, coastal, etc.); or native resident or migratory fish or wildlife species, corridors, or nurseries. No mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

The City does not have a tree preservation ordinance for trees on private property. In the event future development requires the removal of trees on City property, as part of the approval process the developer would be required to comply with City policies related to tree removal and replacement. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

The City does not have a Habitat Conservation Plan nor Natural Community Conservation Plan. The Specific Plan area is located within a fully developed, urban setting surrounded by office, commercial, and residential land uses void of native plant or animal life and limited cover and foraging habitat and the Specific Plan Update would not significantly impact biological resources. There are no Habitat Conservation Plans or Natural Community Conservation Plans applicable to these areas. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

d) Geology and Soils

The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault.

The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: seismic ground shaking.

Indirect impacts could occur through potential future development. Objectives of the Specific Plan Update would encourage and facilitate the redevelopment of underutilized sites within the Downtown area, including along primary transit corridors, but it does not propose specific development projects. As all areas of the City are essentially built-out, all future development would be infill and/or replacement of existing uses.

As southern California is seismically active, potential impacts associated with seismic hazards, including rupture of a fault, strong seismic shaking and seismic-related ground failure currently exist. Earthquakes that could affect the City, including the Specific Plan area, would most likely originate from the Newport-Inglewood, Charnock, Santa Monica, Sierra Madre, Palos Verdes, Verdugo, San Fernando, and San Andreas Faults. These faults are close enough in proximity or expected to generate strong enough shaking that could affect the City. As future development would only occur on sites currently or previously developed, impacts resulting from potential construction would be the same as under current conditions.

The General Plan addresses geology and soils in the Safety Element, and the City has adopted the California Building Code that includes provisions for construction in seismically active areas, and on different types of soils. The level of seismicity in El Segundo, both as to maximum credible earthquake intensity and likely earthquake occurrences, is approximately the same as for the Los Angeles Basin. Adherence to regulatory codes, such as Uniform Building Code (UBC) and California Building Code (CBC), would ensure that all new development would be built to adequately withstand strong seismic ground shaking through proper engineering and design. Depending on location and scope, applicants may be required to prepare geologic reports to address potential geologic impacts associated with the development of the site. The City ensures compliance with development requirements at the time of building permits are issued.

Neither adoption of the Specific Plan Update nor any future development within the urban/developed core would result in potential impacts associated with seismic hazards that don't currently exist. Therefore, impacts related to geology and soil, such as faulting, groundshaking, and soil instability would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: seismic ground failure, including liquefaction.

Strong seismic ground shaking could result in liquefaction of poorly consolidated and saturated soils. Liquefaction occurs when water-saturated sediments are subjected to extended periods of

shaking. The Safety Element of the El Segundo General Plan states that some areas of the City are located on sand dune formations with high groundwater tables. As previously discussed, these soils are located 0.80 miles west of the Specific Plan area.[3] Regardless, adherence to regulatory codes, such as UBC and CBC, would ensure new structures be built to adequately withstand liquefaction or ground failure associated with strong seismic ground shaking through proper engineering and design. This would limit the potential impact to less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: landslides.

The Specific Plan area is relatively flat, therefore, all future potential development sites are all located in areas that are predominately flat. Therefore, the potential for seismically-induced landslides to occur is low. Though landslides in the urban area are unlikely, future development in the City would be required to adhere to all applicable UBC and CBC standards. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not result in substantial soil erosion or the loss of topsoil.

Soil erosion or loss of topsoil would generally not occur as the Specific Plan area is primarily built out. No changes to policies resulting in increased erosion would occur. Continued adherence to the standards of the existing CBC and compliance with the National Pollutant Discharge Elimination System (NPDES) permit and Storm Water Pollution Prevention Plan (SWPPP) requirements, as well as implementation of best management practices, would limit impacts related to soil erosion. Additionally, all future development would be required to implement Best Management Practices (BMPs) for construction activities as specified by the California Storm Water Best Management Practices Handbook and/or the City's Storm Water BMP Manual. The BMPs include measures guiding the management and operation of construction sites to control and minimize the volume of surface runoff. These measures address procedures for controlling erosion and sedimentation and managing all aspects of the construction process. All future development projects must comply with all City, state, and federal standards pertaining to stormwater run-off and erosion. As such, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

The Project would not 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.

[3] *California Department of Conservation, Earthquake Zones of Required Investigation Map: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed December 2022.*

The project is a revision to the existing El Segundo Downtown Specific Plan. New developments would be located on sites that have already been developed. It is unlikely that a new structure on a previously or currently occupied site designated for urban use would experience unstable conditions that were not previously encountered. Future risks would be similar those that currently exist. Additionally, proper engineering and adherence to required building standards, such as the UBC and CBC should ensure that impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The Specific Plan area is entirely located within the urbanized area of the City. The City, which includes the Specific Plan area, is served by existing sewer infrastructure. No septic tanks would be required. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

e) Hazards and Hazardous Materials

The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Potential future projects would be comprised of residential, office, medical office, retail and restaurant uses on sites that are currently developed. The proposed DSP Update would potentially increase the density of these types of uses; however, the occasional use or disposal of hazardous materials generally associated with these types of uses include unused paint, aerosol cans, cleaning agents (solvents), landscaping-related chemicals, and other common cleaning products and household substances. These materials are generally disposed of at non-hazardous Class II and III landfills (along with municipal solid waste). With compliance with the required procedures and guidelines during construction and throughout operation, impacts to the public and the environment associated with future development due to the routine transport, use, and disposal of hazardous materials would be less than significant. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

According to CALFire, the City, which includes the Specific Plan area, is not located in a Very High Fire Hazard Severity Zone.[4] Future development within the Specific Plan area would not be subject to any more risk than other development in the City not located within a Very High Fire

[4] *Cal Fire, State Responsibility Area Viewer, website: https://calfireforestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed: December 2022.*

Hazard Severity Zone. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

f) Hydrology and Water Quality

The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Construction would require earthwork activities including excavation of on-site soils and site grading. During earthwork activities, exposed and stockpiled soils on the construction site could be subject to minor erosion and conveyed via stormwater runoff to municipal storm drains and into the Pacific Ocean.

However, any project construction would occur in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Order No. 99-08)-DWQ) and the El Segundo Municipal Code Chapter 5-4. The El Segundo Municipal Code Chapter 5-4 specifies Best Management Practices (BMPs) that must be used during construction to prevent or reduce pollutant loading from stormwater or non-stormwater discharges to receiving waters. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

With compliance with regulatory requirements, pollutant levels in urban runoff during construction would be minimized. Therefore, project construction impacts related to the violation of water quality standards or waste discharge requirements would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

The City, which includes the Specific Plan area, is located within the West Coast Groundwater Basin. The project could result in construction earthwork and groundwater may encountered during excavation in the DSP area. It is also possible that dewatering systems would be necessary for projects resulting from the DSP Update. The DSP area is primarily developed with existing urban uses and future development in the DSP area would be infill development and would not likely result in large excavation areas or large amounts of dewatering. Additionally, future development would not change large areas that are currently undeveloped and available for rainwater infiltration. Therefore, construction and operation of any potential development would have a minimal impact on groundwater in the area and would not substantially decrease groundwater supplies through substantial increases in impervious surfaces.

The proposed project would generate a water demand. The City no longer withdraws from the West Coast Groundwater Basin as a groundwater source as it receives its water from the West Basin Municipal Water District. West Basin purchases imported water from the Metropolitan Water

District of Southern California and wholesales the imported water to cities and private companies in southwest Los Angeles County, including the City of El Segundo. Therefore, the project would not have the potential in decrease groundwater supplies from increase in demand. Therefore, project impacts related to groundwater supplies and recharge would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not result in substantial erosion or siltation on- or off-site.

The Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

The Project would not 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.

The Project would not impede or redirect flood flows.

There are no streams or rivers in the DSP area. The project could result in construction earthwork and grading that would expose soils. However, any project construction would occur in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Order No. 99-08)-DWQ) and the El Segundo Municipal Code Chapter 5-4. The El Segundo Municipal Code Chapter 5-4 specifies Best Management Practices (BMPs) that must be used during construction to prevent or reduce pollutant loading from stormwater or non-stormwater discharges to receiving waters. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. During operation, development in the DSP area would be required to control pollutants, pollutant loads, and runoff volume by: 1) minimizing the impervious surface area and 2) controlling runoff through infiltration, bioretention, and/or rainfall harvest and use. Compliance with existing regulations such as the National Pollutant Discharge Elimination System and the El Segundo Municipal Code Chapter 5-4, future development in the Specific Plan area would not significantly impact water quality, drainage patterns and runoff, or groundwater quality. The only area of the City located in a flood zone is the 0.8-mile frontage along the Pacific Ocean, which is considered a Special Flood Hazard Area. The Specific Plan area is located approximately 1.0 mile east of the Pacific Ocean.

Therefore, project impacts related to erosion, siltation, increase in run-off, or impeding or redirecting flood flows would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project is not in a flood hazard, tsunami, or seiche zone, with risk release or pollutants due to project inundation.

The City, which includes the Specific Plan area, is located adjacent to the Pacific Ocean, which could create tsunami. The Specific Plan area is located approximately 1.0 mile east of the Pacific Ocean. The tsunami hazard area does not extend into any part of the City that is developed.

Development resulting from the Specific Plan Update would occur on previously developed sites in the City.

The City, which includes the Specific Plan area, does not contain large bodies of water that would be subject to seiche. Accordingly, impacts related to the risk from tsunami or seiche would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As discussed above, the City would require implementation of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Order No. 99-08)-DWQ) and the El Segundo Municipal Code Chapter 5-4 for any project activities. Therefore, project construction and operation would not conflict with implementation of any water quality control plan. As discussed under b), construction and operation of the project would not substantially deplete groundwater supplies or interfere with groundwater recharge and would therefore not conflict with implementation of any groundwater management plan. Therefore, project impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

g) Land Use and Planning

The Project would not physically divide an established community.

Objectives of the Specific Plan Update would encourage and facilitate the redevelopment of underutilized sites within the Downtown area, including along primary transit corridors. Future development would be primarily infill both through redevelopment of an existing site or the development of higher density mixed use projects. As such, adoption of the Specific Plan Update would not physically divide an established community. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

h) Mineral Resources

The Project would not 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.

The Project would not 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 portion of the City, which includes the Specific Plan area, is delineated as a mineral resource or mineral resource recovery site in the City's General Plan. There are no active mines or mineral resource extraction occurring in the City and all of the Downtown area is currently developed with land uses that are not related to mining or mineral extraction. Therefore, no impacts would occur,

and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

i) Noise

The Project would not 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.

The Specific Plan area is located less than 3,000 feet south of LAX (approximately 0.55-mile), but only a small portion of the Specific Plan area is located within the LAX Airport Influence Area, or "AIA" (specifically, three parcels south of Mariposa Avenue along Main Street),[5] and the Specific Plan area is located outside the airport's 65-dBA CNEL noise contours.[6] State planning standards consider all land uses with noise levels from airport operations less than 65 dBA CNEL to be compatible with aircraft operations.

The project is a revision to the existing El Segundo Downtown Specific Plan. As all areas of the Specific Plan area are essentially built-out, all future development would be infill and/or replacement of existing uses. As future development would only occur on sites currently or previously developed, impacts resulting from construction of new development would be similar as under current conditions. Furthermore, the Los Angeles County Airport Land Use Commission has reviewed the proposed Specific Plan Update for potential conflicts with the applicable airport land use plan, including exposure to aircraft noise, and confirmed that the Specific Plan area, including the three parcels located within the AIA for LAX, are located "well south of the existing 65 CNEL noise contours" and determined that the "proposed changes in the Specific Plan Update are of a nature that do not warrant impacts of concern to ALUC."[7] In addition, development under the Specific Plan does not propose construction of new or relocation or expansion of existing airport facilities that would create new or alter existing airport noise contours. Therefore, the Project would not expose people residing or working in the project area to excessive noise levels associated with airports, and this impact would be less than significant; no mitigation measures are required.

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5 *County of Los Angeles, Airport Influence Area for Airports in Los Angeles County, last updated August 3, 2023, available at https://data.lacounty.gov/datasets/lacounty::airport-influence-area-1/explore?location=33.922920%2C-118.415184%2C16.00, accessed September 15, 2023.*

6 *Los Angeles World Airports, Quarterly Noise Reports, https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/California-state-airport-noise-standards-quarterly-reports-and-contour-maps, accessed September 5, 2023.*

7 *Los Angeles County, Airport Land Use Commission, Personal Communication Letter, Subject: Downtown Specific Plan Update, City of El Segundo, signed Bruce Durbin, Supervising Regional Planner, Ordinance Studies/ALUC Section, dated September 26, 2023.*

j) Transportation

The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

The Specific Plan Update does not include any specific development of land. Any new development proposed under the Specific Plan Update would require that access locations be designed to City standards and to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Street trees and other potential impediments to adequate driver and pedestrian visibility would be required to be minimal and the City would require that pedestrian entrances separated from vehicular driveways provide access from the adjacent streets. As a result, the Specific Plan Update would not substantially increase hazards or conflicts due to a geometric design feature, or result in inadequate emergency access. Therefore, implementation of the Specific Plan Update would have a less than significant impact, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

The Project would not result in in adequate emergency access.

Projects proposed pursuant to the Specific Plan Update would be reviewed to ensure that new development would be subject to provisions within the City's Fire Code regarding emergency access. Likewise, any new development would be subject to the City Fire Code requirements and Fire Department conditions of approval.

Construction activities have the potential to temporarily impact traffic and vehicle speeds on adjacent roadways; however, these impacts would be temporary and emergency access to roadways, would not be blocked by project construction. Furthermore, project applicants would coordinate with the City to ensure appropriate construction staging areas and adequate emergency vehicle access to project sites and adjacent roadways are maintained throughout construction periods.

The Specific Plan Update could include construction of new buildings consisting of residential, office, medical office, retail and restaurant uses. As required by the El Segundo Fire Department, future projects would be designed to accommodate emergency access, including police and fire access. Additionally, applicants would submit a Fire/Life Safety Plan that includes emergency site access during project construction, permanent Fire Department access during operation, the locations of fire hydrants and sprinkler systems, and fire alarm system specifications prior to issuance of building permits for a project. Therefore, the Specific Plan Update would not result in inadequate emergency access during project construction and operation and impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

k) Wildfire

The Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

According to CALFire, the City, which includes the Specific Plan area, is not located in a Very High Fire Hazard Severity Zone.[8] The closest State-designated fire hazard zone is at the Ballona Wetlands, more than 6.5 miles north from the Specific Plan area and open space areas around the Inglewood Oil Fields and Kenneth Hahn State Recreation Area, more than nine miles north from the Specific Plan area.

Future development within the Specific Plan area would not be subject to any more risk than other development in the City not located within a Very High Fire Hazard Severity Zone. Furthermore, future development would be required to comply with applicable codes, regulations, and standard measures for fire protection. Developers would be required to provide proof of compliance with applicable building and fire code requirements, as well as El Segundo Fire Department Plan Check requirements. These requirements include, but are not limited to, items such as types of roofing materials, building construction, fire hydrant flows, hydrant spacing, access and design, fire sprinkler systems, and other hazard reduction programs such as the Fire/Life Safety Plan, as set forth by the El Segundo Fire Department and the Uniform Fire Code. Therefore, there would be no impact related to wildfire and emergency response or evacuation plans, exposure to pollutant concentrations, exacerbated fire risk, or flooding or landslides as a result of post-fire slope instability, and no mitigation measures are required. No further evaluation of this topic is required in the Programmatic EIR.

6. References

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[8] *Cal Fire, State Responsibility Area Viewer, website: https://calfireforestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed: December 2022.*

VI. Alternatives To The Proposed Project

This section describes and evaluates alternatives to the El Segundo Downtown Specific Plan (Specific Plan or Project). This section implements the requirements set forth in the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), and identifies the Environmentally Superior Project Alternative, as required by *State CEQA Guidelines* Section 15126.6(e)(2).

1. Introduction

CEQA requires that Environmental Impact Reports (EIRs) "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (14 CCR 15126.6[a]). The *State CEQA Guidelines* direct that the selection of alternatives be governed by "a rule of reason" (14 CCR 15126.6[a] and [f]). As defined by the CEQA Guidelines (14 CCR 15126.6[f]):

> The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project.

As presented in prior sections of this Draft EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures. Consistent with CEQA, the analysis presented in this section considers a reasonable range of alternatives to the Project and evaluates their comparative environmental impacts. The selection of alternatives and their discussion must "foster informed decision making and public participation".[1] Therefore, this section identifies potential alternatives to the Project and evaluates them, as required by CEQA.

The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact "feasible." The final decision regarding the feasibility of alternatives lies with the decision maker(s) for a given project, who must make the necessary findings addressing the potential feasibility of an alternative, including whether it meets most of the basic project objectives (further described in **Section VI.2, Project Objectives**) or reduces the severity of significant environmental effects pursuant to CEQA.[2]

This Draft EIR includes the analysis of three alternatives to the Project:

[1] *14 CCR 15126.6[a].*
[2] *California Public Resources Code, Section 21081; see also 14 CCR 15091.*

- Alternative A – No Project
- Alternative B – Reduced Specific Plan Development
- Alternative C- Adopted El Segundo Specific Plan Boundary

These alternatives were included for analysis because of their potential to avoid or substantially lessen the Project's significant impacts. **Table VI-2, Comparison of Project and Alternatives Impacts**, at the end of this Introduction subsection, shows the differences between the various components of the alternatives.

2. Project Objectives

State CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives for the Project. The objectives assist the City in developing a reasonable range of alternatives to be evaluated in the EIR. The Project objectives also aid decision makers in preparing Findings of Fact and a Statement of Overriding Considerations, if necessary. The statement of objectives also is to include the underlying purpose of a project and may discuss a project's benefits. The Project's specific objectives are as follows:

(1) To provide an Update to the Adopted Downtown Specific Plan that will guide the future development of the Specific Plan area and provides land use and development standards, identifies improvements in the public realm, and provides a plan for infrastructure and public services to accommodate potential development.

(2) To promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing.

(3) To attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers.

(4) To promote a range of housing options with opportunities for all incomes.

(5) To improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.

3. Significant and Unavoidable Impacts

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of implementation of the Project, the significant impacts must be considered, although it is recognized that alternatives aimed at reducing the significant and unavoidable impacts would also avoid or reduce impacts that were found to be less than significant or reduced to below a level of

significance with implementation of mitigation measures. The analysis in **Section IV** of this Draft EIR determined that no significant and unavoidable impacts would occur.

4. Alternatives Considered and Eliminated During the Project Planning Process

Pursuant to State CEQA Guidelines Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the Draft EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

a) Alternate Site Alternative

An alternate site for the Specific Plan was eliminated from further consideration. The Specific Plan's focus is to create an economically prosperous Downtown with a mix of uses and entertainment options and cohesive elements that tie the community together. The Project's goal is to create a balance of uses within the Downtown to reach its optimal potential and to provide direction for streetscape beautification, outdoor gathering spaces, improved mobility, and other enhancements that establish a unique and inviting environment highlighting its historical and cultural roots to enrich this community destination. CEQA specifies that the key question regarding alternative site consideration is whether the basic Project objectives would be attained and if any of the significant effects of the Project would be avoided or substantially lessened by having the Project at another location. Given these reasons, it would be infeasible to develop and operate the Project on an alternate site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternative Site Alternative was rejected from further consideration.

5. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in detail to determine if the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Additionally, each alternative is evaluated to determine if the Project objectives, described above, would be achieved.[3] The alternatives were evaluated as follows:

- The alternatives analysis compares the potential environmental impacts of the three alternatives with those of the Project for each of the environmental topics analyzed in detail in **Section IV, Environmental Impact Analysis**, of this Draft EIR, assuming that the

[3] *CEQA Guidelines Section 15126.6(c).*

alternative would implement the same project design features and mitigation measures identified in **Section IV, Environmental Impact Analysis**, of this Draft EIR, as applicable.

- Post-mitigated significant and non-significant environmental impacts associated with each alternative are compared to Project-related impacts and are classified as follows:
    - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, comparative impact is said to be "less."
    - Greater: Where the net impact of the alternative would be clearly more adverse or less beneficial than the Project, the comparative impact is said to be "greater."
    - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar."
- The comparative analysis of the impacts followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by the alternative.

Based on the information and analysis presented in **Section IV, Environmental Impact Analysis**, **Table VI-2, Comparison of Project and Alternatives Impacts**, below summarizes the results of the CEQA analysis for each resource area addressed therein.

Based on the Initial Study, issues for which no significant impacts are anticipated as a result of Project implementation include aesthetics (scenic vistas and damage of scenic resources); agriculture and forestry; biological resources; geology and soils (rupture of an earthquake fault line, seismic ground shaking, seismic ground failure, landslides, erosion/loss of topsoil, unstable soil, expansive soil, and septic tanks); hazards and hazardous materials (routine transport and wildland fires); hydrology and water quality; land use and planning (community division); mineral resources; noise (airport/airstrip); transportation/traffic (design features and emergency access); and wildfire.

6. Alternatives to the Project

a) Alternative A – No Project Alternative

(1) Description

CEQA requires the alternatives analysis to include a No Project Alternative (Alternative A). The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project (*State CEQA Guidelines* Section 15126.6(e)(1)). Pursuant to *State CEQA Guidelines* Section 15126.6(e)(2):

> *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be*

expected to occur in the foreseeable future if the project were not approved, based on current plans, and consistent with available infrastructure and community services.

In the event the Project is not approved, the Specific Plan area would remain in the conditions that existed at the time the Notice of Preparation was published (January 6, 2023). See **Section II, Environmental Setting**, of this Draft EIR, for additional details and figures regarding the existing conditions of the Specific Plan area.

(2) Comparative Analysis

Alternative A assumes the development of the Related Project listed in **Section II.5, Related Projects**. The potential environmental impacts associated with Alternative A are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in **Section IV, Environmental Impact Analysis,** of this Draft EIR.

(a) Aesthetics

Under this alternative, the Specific Plan area would remain in its existing condition, which includes a wide range of commercial, residential, and public uses. Existing development within the Project area ranges from one- to three-story buildings, with many buildings located along or near front property lines at one to two-story heights and a few three-story buildings. This alternative would not result in a change in the visual height, scale, and mass of the development within the Specific Plan area.

The Specific Plan Update would generally accommodate a similar development pattern to the current Specific Plan although it would allow the area to redevelop with higher intensity of land uses, and thus would likely result in changes in visual character and some obstruction of scenic views. Any development under Alternative A would be implemented in accordance with applicable State and local plans, policies and guidelines including, but not limited to, the City's General Plan, Downtown Specific Plan, and provisions of the El Segundo Municipal Code (ESMC) as it relates to development standards, design guidelines, and landscaping and streetscape requirements intended to enhance the visual quality of the area. Like the Project, Alternative A could introduce new sources of light and glare in the Project area, as new development is approved. However, development in most of the Project area already experiences high levels of nighttime lighting and glare, such that any additional effects would be incremental. In addition, future development would be required to comply with existing California Building Code (CBC) regulations pertaining to lighting, as adopted by reference pursuant to Chapter 13-1-1 of the ESMC. As with the Project, development accommodated by Alternative A may benefit, and would generally enhance, the visual character of the Project area, but at a reduced density as compared to the Project. Therefore, visual character and some obstruction of scenic view impacts under Alternative A would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Air Quality

Alternative A would accommodate less overall housing development and associated population growth than the Project while resulting in more employment growth. Alternative A would result in 300 fewer housing units, 732 fewer residents, and 1,057 more jobs, through 2045 than would be anticipated under the Project. However, like the Project, Alternative A would generate growth that is consistent with the 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS) forecasts at a Citywide level and as a result, would not conflict with and obstruct implementation of the 2020-2045 RTP/SCS. Therefore, impacts associated conflicting with or obstructing implementation of the applicable air quality plans under Alternative A would be less than significant and similar to the less-than-significant impacts of the Project.

Although less construction may occur overall under Alternative A as compared to the Project, maximum daily emissions would be similar to what would occur under the Project since the nature and magnitude of individual construction projects would be similar. Therefore, similar to the Project, it is reasonable to assume that development under Alternative A would result in construction emissions of NO_X that would not exceed South Coast Air Quality Management District (SCAQMD) regional and local significance thresholds, and emissions of PM_{10} and $PM_{2.5}$ that would not exceed SCAQMD Localized Significance Thresholds (LSTs). Similarly, because less development would occur under Alternative A, it is reasonable to assume that overall operational emissions would be less within the Project area as compared to the Project. However, growth would likely occur elsewhere in the City and potentially result in increased operational emissions outside of the Project area. Regardless, similar to the Project, the increase in development in the Specific Plan area accommodated by Alternative A would result in daily emissions of VOC that would not exceed the SCAQMD regional significance thresholds. In addition, future development in the Project area accommodated by Alternative A, which is less than what the Project proposes, would result in daily emissions of NO_x, PM_{10} and $PM_{2.5}$ from area sources and mobile sources that would not exceed the SCAQMD regional significance thresholds. Additionally, it is reasonable to assume that exposure of sensitive receptors to temporary construction emissions would be less with Alternative A because less overall construction may occur. Exposure to odors would also be similar to the less than significant impact identified for the Project. Therefore, construction and operational air quality impacts under Alternative A would be less than significant, and less than the less-than-significant impacts of the Project.

(c) Cultural Resources

In the Project area, which is expected to experience substantial new development, individual reasonably anticipated development could potentially cause a substantial adverse change in or disturbance of historical resources and archeological resources. As with the Project, Alternative A may result in demolition or alteration of historical resources or their setting or disturb areas that may potentially contain archaeological and paleontological resources. Alternative A would accommodate development consistent with current land use designation and patterns and, as such, may result in slightly reduced impacts to historical resources and associated settings as compared to the Project. However, development under either Alternative A or the Project would have the potential to disturb archaeological resources and/or human remains. All future

development projects would continue to be subject to existing federal, State, and local requirements with respect to cultural resources and discretionary projects may be subject to project-specific mitigation requirements under CEQA. Under the Project, implementation of **Mitigation Measure (MM) CUL-1,** which requires that in the event that the City requires additional documentation to record potential impacts on historic resources and applicable mitigation measures, the applicant shall be required to prepare a Historical Resources Assessment Report (HRAR), **MM CUL-2**, which includes preparation and implementation of a Worker Environmental Awareness Program (WEAP), and **MM CUL-3**, which requires that all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, would reduce the potential to disturb archaeological resources and human remains. In addition, although existing regulations provide certain protections for significant historical resources, individual developments allowed by Alternative A could potentially cause a substantial adverse change in or disturbance of historical and archaeological resources as defined in CEQA Guidelines Section 15064.5. Therefore, the development that could occur under Alternative A would impose similar Mitigation Measures and the potential for disturbance of cultural resources would be the same as under the Project. Overall, impacts would be less than significant under Alternative A, as with the Project.

(d) Energy

As compared to the Project, development under Alternative A would result in less transportation energy use and less electricity and natural gas consumption than the Project. However, on a per capita basis, Alternative A would result in more transportation energy use and more electricity and natural gas consumption than the Project because of the increased job opportunities coupled with reduced housing density in the Project area. Because Alternative A would consume less energy overall, but more energy than the Project on a per capita basis, it may result incrementally greater impacts with respect to the inefficient, unnecessary, or wasteful direct or indirect consumption of energy as compared to the Project. Nevertheless, as with the Project, Alternative A would not result in energy demands that exceed the existing or planned capacity for the service area or the wider Southern California region. In addition, neither Alternative A nor the Project would conflict with applicable federal, State, or local energy conservation policies aimed at reducing reliance on fossil fuels and increasing reliance on renewable energy sources. As such, the impact of Alternative A with regard to energy consumption would be less than significant but greater than the less-than-significant impacts of the Project.

(e) Geology and Soils

Implementation of the City's current General Plan and existing adopted Specific Plan would generally accommodate development in the same footprints as existing structures in the Project area. Therefore, similar to the Project, Alternative A would have the potential to disturb paleontological resources to the same degree. Implementation of the Project's **MM GEO-1** would reduce the potential to disturb or damage paleontological resources. As similar federal regulations are required for future development within the existing Specific Plan area, the potential for disturbance of paleontological resources would remain less than significant with Alternative A.

Therefore, impacts associated with disturbance of paleontological resources under Alternative A would be less than significant and similar to the less-than-significant impacts of the Project.

(f) Greenhouse Gas Emissions

Development accommodated by either Alternative A or the Project would generate greenhouse emissions (GHG) through individual project construction and operation. GHG emissions would be generated by direct sources such as motor vehicles, natural gas consumption, solid waste handling/treatment, and indirect sources such as electricity generation. Alternative A would accommodate less development overall than the Project and would result in fewer GHG emissions in the Project area. However, it would accommodate less intense development and associated growth in the Project area, which may result in more population and housing growth elsewhere in the City and region where fewer transit options are available and the distances between residences, jobs, and services are greater. Additionally, the increased number of jobs in the Project area coupled with the reduced dwelling units under Alternative A would increase per capita VMT and transportation related greenhouse emissions. As a result, overall citywide and regional GHG emissions as a function of VMT may increase. Overall greenhouse emissions would be incrementally greater than those of the Project. As such, the impact of Alternative A with regard to GHG emissions would be less than significant but greater than the less-than-significant impacts of the Project.

(g) Hazards and Hazardous Materials

Development under Alternative A would continue under the current zoning regulations of the existing Specific Plan. Alternative A would involve no change to planned land use patterns and would involve less overall development capacity and associated growth than would occur under the Project. Similar to the Project, operational activities associated with development under Alternative A would not create increased potential for upset or accident conditions involving hazardous materials released into the environment. Therefore, impacts associated with the upset or accident conditions involving hazardous materials under Alternative A would be less than significant and similar to the less-than-significant impacts of the Project.

Similar to the Project, this alternative would pose less than significant issues related to airports or emergency management plans. As under the Project, development under Alternative A could result in development of the three parcels within the Specific Plan area that are located within the AIA for LAX. However, as discussed in **Section IV.G, Hazards and Hazardous Materials**, of this EIR, the parcels are located outside of the regulatory 65 CNEL noise contour and they are not within established flightpaths nor near a runway protection zone of the airport. Moreover, because development on these parcels under Alternative A would also be subject to the existing land use designations, zoning, and height limitations that the Los Angeles County Airport Land Use Commission (ALUC) concluded did not result in impacts of concern, development under Alternative A would also not result in impacts of concern. In addition, development of these parcels under Alternative A would be subject to the same Federal Aviation Administration notification standards and notification requirements. As such, as with the Project, impacts related to airport proximity under Alternative A would also be less than significant. Furthermore, implementation of Alternative A would not interfere with the City's adopted Emergency Operations Plan (EOP).

Therefore, similar to the Project no impacts related to airports would occur and less than significant impacts related to emergency management plans would occur.

As with the Project, redevelopment, renovation, and demolition of structures built before 1979 could potentially involve asbestos or lead but asbestos and lead would not be released into the atmosphere with compliance of existing regulations. Grading and construction activity could also potentially result in the release of soil and/or groundwater contamination, which could potentially affect schools and result in exposure of Project area construction workers and occupants of neighboring properties, and on-site occupants during operation to releases of hazardous materials. Compliance with applicable regulations would reduce such impacts to a less than significant level. As with the Project, grading and construction activity could potentially result in the release of soil and/or groundwater contamination or involve a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. Overall impacts associated with Alternative A would be similar to, but slightly less than, those of the Project since the overall level of development would be lower. Adherence to Mitigation Measures **MM HAZ-1**, as discussed in **Section IV.G, Hazards and Hazardous Materials**, of this Draft EIR, would reduce impacts to less than significant. As Alternative A has similar mitigation measures, as outlined in the El Segundo General Plan Draft EIR, the potential for exposure to contaminants to the public due to possible construction on hazardous sites, and release of hazardous emissions would be similar to the Project and would be less than significant.

(h) Land Use and Planning

Under Alternative A, development would continue under current planned land use patterns in the Specific Plan area. This alternative would not accommodate the greater residential development capacity that could occur within the Specific Plan area under the Project through the addition of land use and zoning changes. Furthermore, this alternative would not include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area.

Like the Project, Alternative A would be generally consistent with 2020-2045 RTP/SCS policies related to the provision of residential development to nearby major employers, including LAX, energy/gas/oil and aerospace companies and near the City's "super block" development, which contains a mixture of office and research and development uses, thereby reducing travel demands by developing a mix of residential housing opportunities in proximity to employment centers. However, as discussed under Air Quality, Alternative A may implement 2020-2045 RTP/SCS, AQMP, and Air Quality Element policies related to concentrating development near transit and reducing regional VMT. However, this reduction would be to a lesser degree than the Project since the lower overall residential development totals may result in increased residential development elsewhere in the City and incrementally higher VMT in the Project area. As such, the impact of Alternative A would be less than significant but greater than the less-than-significant impacts of the Project.

(i) Noise

Any future development in the Project area would include mechanical equipment, loading, trash pick-up, and other noise-generating activities. However, such activities would be typical of the urban environment in the Project area. In addition, any on-site activities would be required to comply with applicable provisions of the El Segundo Municipal Code (ESMC). Future development accommodated by either Alternative A or the Project would also increase vehicle trips in the Project area that would generate mobile noise. However, as described in **Section IV.I, Noise**, of this Draft EIR, based on the Project's estimated trip generation and distribution, it is not anticipated that the Downtown Specific Plan Update would result in substantial noise increases from traffic generated by future projects implemented under the Specific Plan Update. Therefore, as Alternative A would result in a reduced amount of development, permanent noise increases due to mobile operational activities under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

All construction would be required to comply with the noise regulations established in the ESMC, including Section 7-2-4C, 7-2-10(D), and Section 7-2-13. Therefore, similar to the Project, the City's noises standards and future projects' compliance therewith would ensure that noise-sensitive receptors are protected against substantial noise increases from construction activities under Alternative A. Therefore, as Alternative A would result in a reduced amount of development, impacts temporary construction noise resulting from implementation of Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

Any future construction activity, specifically pile driving, could potentially generate vibration exceeding the 90 VdB threshold for buildings extremely susceptible to building damage (e.g., historical structures). Similar to the Project, under Alternative A the City would review individual development proposals for compliance with ESMC Section 7-2-10(D), which prohibits construction-related groundborne vibration levels that endanger the public health, welfare, and safety. Compliance with this regulatory requirement, as well as the application of project-specific mitigation measures for future projects in the Specific Plan area as necessary (e.g., utilizing alternative construction equipment/techniques such as auger drilling instead of pile driving), would ensure that future projects do not expose buildings to potentially damaging levels of groundborne vibration or levels capable of causing severe human annoyance. Therefore, as Alternative A would result in a reduced amount of development, impacts from construction-related vibration resulting from implementation of Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

Similar to the Project, it is not anticipated that new development in the Project area under Alternative A would involve activities that would result in substantial vibration levels (e.g., heavy equipment or industrial operations). Operations of the retail, restaurant, office, medical office, and residential uses would not contain such vibration sources. Similar to the Project, future development projects under Alternative A would be required to comply with ESMC Section 7-2-9, which would ensure that future projects would be prohibited from exposing buildings to potentially damaging levels of groundborne vibration or levels capable of causing human annoyance. Therefore, as Alternative A would result in a reduced amount of development, impacts from

operational vibration resulting from implementation of Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(j) Population and Housing

Under Alternative A, the Specific Plan area would remain in its existing condition and would not be rezoned to a higher density as proposed under the Project. The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. As such, although Alternative A would not implement RTP/SCS policies related to jobs/housing balance and concentrating growth and development near transit to the same degree that the Project would. Alternative A would not result in significant impacts related population, housing, or employment growth. When compared to Alternative A, the Project would result in an overall increase in housing. Therefore, the limiting housing development in the Project area as would occur under Alternative A may result in increased housing development elsewhere in the City, which could potentially increase displacement of existing housing in other El Segundo neighborhoods. Like the Project, Alternative A would not induce substantial population growth inconsistent with the regional growth plans. Therefore, impacts associated with population and housing under Alternative A would be less than significant and similar to the less-than-significant impacts of the Project.

(k) Public Services

(i) Fire Protection

Implementation of Alternative A would involve less overall development and associated growth than the Project. Nevertheless, the increased growth under either scenario may require additional fire protection services to serve new residents. With respect to fire protection services, both Alternative A or the Project would accommodate new development that would increase demand for fire protection service. This may result in the need for new or expanded fire facilities. Based on the urbanized character of the Project area, it is anticipated that new or expanded facilities could be built without creating significant environmental impacts. Depending on the location or nature of new facilities, the construction of needed new facilities could potentially result in impacts; however, like the Project, those impacts would be consistent with those already identified in this Draft EIR for construction or operations. Project-specific environmental analysis under CEQA would be required to address any site-specific environmental concerns. Therefore, impacts associated with fire protection under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(ii) Police Protection

Implementation of Alternative A would involve less overall development and associated growth than the Project. Nevertheless, the increased growth under either scenario may require additional police protection services to serve new residents. With respect to police protection services, both Alternative A or the Project would accommodate new development that would increase demand for police protection service. This may result in the need for new or expanded police facilities.

Based on the urbanized character of the Project area, it is anticipated that new or expanded facilities could be built without creating significant environmental impacts. Depending on the location or nature of new facilities, the construction of needed new facilities could potentially result in impacts; however, like the Project, those impacts would be consistent with those already identified in this Draft EIR for construction or operations. Project-specific environmental analysis under CEQA would be required to address any site-specific environmental concerns. Therefore, impacts associated with police protection under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(iii) Schools

Under Alternative A, the Specific Plan area would remain in its existing condition and would not be rezoned to a higher density as proposed under the Project. The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. Therefore, the Project would result in an overall increase in student population as compared to Alternative A. As such, Alternative A would accommodate development that would increase the student population of the Specific Plan area and would create the need for new or expanded school facilities, but to a lesser extent than the Project. As with the Project, developers would be required to pay applicable school impact fees. As with the Project, any impacts associated with new school construction would be similar to those analyzed and identified in the Draft EIR for other types of development, any site-specific impacts would be speculative and would be addressed by El Segundo Unified School District (ESUSD) as part of a project-level CEQA review. Therefore, impacts associated with schools under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(iv) Parks and Recreation

Implementation of Alternative A would involve less overall development and associated population increases than the Project. However, any new development would increase the use of existing park and recreational facilities throughout the City, including in and around adjacent to the Project area. The State of California Parks Department (State Parks) typically uses a 3.0-acres-per-1,000-residents ratio as a standard of park space within communities. Based on the U.S. Census count of 17,272 City residents in 2020 (see **Section IV.J, Population and Housing**), there are approximately 4.6 acres of qualified City-owned park space per 1,000 residents, and approximately 6.2 acres of total qualified park space (including El Segundo Beach) per 1,000 residents. Both the City-owned ratio and total ratio exceed the State Parks standard. Under Alternative A, the Project area population would be less when compared to the Project. Therefore, since the City's Parks exceed the State of California Parks Department standard of park space at about 4.6 acres of qualified City-owned park space per 1,000 residents, and approximately 6.2 acres of total qualified park space (including El Segundo Beach) per 1,000 residents, the additional residents proposed under Alternative A would not result in a substantial reduction in existing standards of service for parks. Therefore, impacts associated with deterioration of existing parks in and around the Project area under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

Reasonably expected development from Alternative A would increase demand for recreational and park facilities that serve the Project area but would not require construction of new recreational or park facilities. Furthermore, based on the urban nature of the Project area and the presence of constraints to the development of large park facilities, the construction and operation of new facilities would not be expected to result in significant environmental impacts. Therefore, impacts from the construction or expansion of new recreational facilities under Alternative A would be less than significant and similar to the less-than-significant impacts of the Project.

(v) Libraries

Implementation of Alternative A would involve less overall development and associated population increases than the Project. With respect to libraries, Alternative A would increase demand for library facilities, although to lesser degree than the Project. The Project area is well served by library facilities and would not require the construction of new or expanded facilities. Therefore, impacts associated with libraries under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(l) Transportation

Alternative A would continue to generate traffic from residents traveling to and from the Specific Plan area. The Specific Plan area would remain in its existing condition and would not be rezoned to a higher density. However, this alternative would not include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area. Similar to the Project, Alternative A would not impact existing transit service and alternative transportation facilities within the Specific Plan area. Therefore, traffic impacts under Alternative A would be less than significant, and similar to the less-than-significant impacts of the Project.

(m) Tribal Cultural Resources

As described in **Section IV.M, Tribal Cultural Resources**, of this Draft EIR, Los Angeles has a long history of Native American occupation, and any development activities that include ground disturbance have the potential to significantly impact tribal cultural resources. Effects on tribal cultural resources are only known once a specific development has been proposed because the effects are highly dependent on both the individual development site conditions and the characteristics of the proposed activity. Development accommodated by either Alternative A or the Project may disturb areas that potentially contain tribal resources. Similar to the Project, all future development projects under Alternative A would continue to be subject to existing federal, State, and local requirements and discretionary projects, subject to CEQA review would be required to comply with AB 52, which for projects relying on a [mitigated] negative declaration or an EIR, would require consultation with California Native American tribes. Implementation of the Project's **MM TCR-1** would reduce the potential to disturb or damage tribal cultural resources. Therefore, as similar federal regulations are required for future development within the existing Specific Plan area, impacts associated with disturbance of tribal cultural resources under

Alternative A would be less than significant and similar to the less-than-significant impacts of the Project.

(n) Utility and Service Systems

(i) Water

With respect to water demand, per the 2020 Urban Water Management Plan, current water supplies, planned future water conservation efforts, and planned future water supplies will enable the City to reliably provide water that meets the demands of the City for a 25-year planning horizon (through 2040). According to the City UWMP, water demands are projected to be 13,570, 12,743, 12,009, and 11,340 acre feet per year (afy) for the years 2025, 2030, 2035, and 2040, respectively.[4] Under Alternative A, the Specific Plan area would remain in its existing condition and would not be rezoned to a higher density as proposed under the Project. The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. The Project's estimated consumption of 248 AFY would represent 1.83, 1.95, 2.07, and 2.19 percent of the projected demands for these years, respectively, and would therefore, not be a significant increase in water demand. Alternative A would demand less water as compared to the Project. Therefore, as with the Project, adequate water supply exists to meet projected demand through the year 2040 for Alternative A and development of new water supplies would not be necessary. Expansion/replacement of water distribution infrastructure may be needed, but temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Thus, impacts to water resources under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(ii) Wastewater

Implementation of Alternative A would involve less overall development and associated growth than would be anticipated under the Project. The Project's maximum wastewater flow of 221,600 gpd (0.22 mgd) would represent approximately 0.09 percent of the current remaining capacities of the Hyperion Sanitary Sewer System and approximately 0.13 percent of the current remaining capacity of the Hyperion Water Reclamation Plant (HWRP). Therefore, as the implementation of Alternative A would generate less wastewater as compared to the Project the HWRP would have sufficient available treatment capacity to serve the Project area under Alternative A. In addition, the HWRP would be able to adequately treat future project-generated sewage under Alternative A and the treatment requirements of the RWQCB would not be exceeded so new or expanded treatment facilities would not be needed. Expansion/replacement of Project area conveyance infrastructure may be needed and various facility improvements are already planned. Temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Continued compliance with the City's Low Impact Development (LID) Ordinance for all new development would ensure that any future development under Alternative A would not increase demands on stormwater drainage facilities and or

[4] *City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021.*

expansion of existing facilities beyond specific improvements needed for individual development projects. Thus, impacts to wastewater facilities under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(iii) Solid Waste

There are three landfills within approximately 35 miles of the Project area: Scholl Canyon landfill; Burbank Landfill Site No. 3; and Calabasas landfill. Collectively, these nearby landfills have a permitted daily capacity of 7,140 tons per day and an average daily intake of 2,486 tons per day. The amount of solid waste that could potentially be generated by the Project would represent 0.04 percent of the daily permitted capacity and 0.06 percent of the remaining daily capacity after accounting for the existing average daily intake for the three closest landfills. Implementation of Alternative A would involve less overall development and associated growth than would be anticipated under the Project. With that said, Alternative A would generate less waste than the Project. Furthermore, all 10 existing Class III landfills within Los Angeles County have a collective maximum daily permitted capacity of 45,297 tons per day, an average daily disposal intake of 19,291 tons per day, and an estimated remaining permitted total capacity of 142.67 million tons. Therefore, sufficient permitted capacity is available to accommodate the County's long-term disposal needs under the status quo and sufficient permitted capacity is available to accommodate the Project area's solid waste disposal needs. Therefore, as with the Project, implementation of Alternative A would result in solid waste generation that would remain within the capacity of waste disposal facilities serving the City, new or expanded facilities would not be needed. Thus, impacts to solid waste facilities under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(iv) Energy Infrastructure

Implementation of Alternative A would involve less overall development and associated growth than would be anticipated under the Project. With that said, Alternative A would consume less energy than the Project. Similar to the Project, electrical and natural gas supplies are not expected to be adversely affected by development under Alternative A, but improvements to Project area distribution and telecommunication facilities may be needed. Temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Thus, impacts to energy infrastructure under Alternative A would be less than significant and less than the less-than-significant impacts of the Project.

(3) Relationship to Project Objectives

Under Alternative A, development would continue under current planned land use patterns in the Specific Plan area. This alternative would not accommodate the greater residential development capacity that could occur within the Specific Plan area under the Project through the addition of land use and zoning changes. Furthermore, this alternative would not include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and

transit within the Specific Plan area. Specifically, Alternative A would achieve none of the basic Project objectives:

- To provide an Update to the Adopted Downtown Specific Plan that will guide the future development of the Specific Plan area and provides land use and development standards, identifies improvements in the public realm, and provides a plan for infrastructure and public services to accommodate potential development.
- To promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing.
- To attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers.
- To promote a range of housing options with opportunities for all incomes.
- To improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.

(4) Reduction of Significant Impacts

Table VI-2, Comparison of Project and Alternatives Impacts, summarizes the impact comparison of the Project and its alternatives. The Project is noted for avoiding significant unavoidable impacts. On the other hand, Alternative A further diminishes less-than-significant impacts in various Project areas but introduces increased impacts concerning energy, greenhouse gas emissions, and land use and planning. Additionally, Alternative A falls short of achieving any of the fundamental Project objectives.

b) Alternative B – Reduced Specific Plan Development Alternative

(1) Description

The purpose of the Reduced Specific Plan Development Alternative is to potentially avoid or substantially lessen the Project's significant impacts by reducing the overall development as compared to the Project. Under Alternative B, development would be similar to the Project, in that it would include changes to land use designations and zoning that would allow increased development capacity within the Specific Plan area. However, the overall increase in development that could occur within the Specific Plan area under Alternative B would be 25 percent less than that which could occur under the Project. **Table VI-1, Alternative B Reduced Specific Plan Development Summary**, summarizes the development that would be allowed under this alternative.

Table VI-1
Alternative B Reduced Specific Plan Development Summary

Land Use	Anticipated Downtown Specific Plan Square Footage	Alternative B Anticipated Square Footage
Retail/Restaurant	130,000	97,500
General Office	200,000	150,000
Medical Office	24,000	18,000
Multi-Family Units	300	225
Source: RRM Design Group, 2023.		

Similar to the Project, Alternative B would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area. Alternative B would reduce the amount of excavation and hauling of soil as compared to the Project due to less overall allowable development, which would lessen the impacts related to air quality emissions during construction and Project-level noise from construction. Alternative B's other impacts would be either less than or similar to the Project's impacts.

The potential environmental impacts associated with Alternative B are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

(2) Comparative Analysis

Alternative B assumes the development of the Related Project listed in **Section II.5, Related Projects**. The potential environmental impacts associated with Alternative B are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in **Section IV, Environmental Impact Analysis,** of this Draft EIR.

(a) Aesthetics

A reduced quantity of overall structures and landscaping would be introduced to the Specific Plan area as this alternative would allow approximately 88,500 fewer square feet of development and 75 fewer multi-family dwelling units than the Project. Impacts to aesthetics would be the same as they are analyzed for this development option in the Draft EIR.

Alternative B would generally accommodate a similar development pattern to the current Specific Plan although it would be at a lower density, and thus would likely result in fewer changes in visual character and some obstruction of scenic views. Similar to the Project, any development under Alternative B would be implemented in accordance with applicable State and local plans, policies and guidelines including, but not limited to, the City's General Plan, Downtown Specific Plan, and provisions of the ESMC as it relates to development standards, design guidelines, and landscaping and streetscape requirements intended to enhance the visual quality of the area. Like the Project, Alternative B could introduce new sources of light and glare in the Project area, as new development is approved. However, development in most of the Project area already

experiences high levels of nighttime lighting and glare, such that any additional effects would be incremental. In addition, future development would be required to comply with existing CBC regulations pertaining to lighting, as adopted by reference pursuant to Chapter 13-1-1 of the ESMC. As with the Project, development accommodated by Alternative B may benefit, and would generally enhance, the visual character of the Project area, but at a reduced density as compared to the Project. Therefore, visual character and some obstruction of scenic view impacts under Alternative B would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Air Quality

Alternative B would accommodate less overall housing development and associated population growth than the Project. Alternative B would result in 75 fewer housing units, 183 fewer residents, and 264 fewer jobs, through 2045 than would be anticipated under the Project. However, like the Project, Alternative B would generate growth that is consistent with the 2020-2045 RTP/SCS forecasts at a Citywide level and as a result, would not conflict with and obstruct implementation of the 2020-2045 RTP/SCS. Therefore, impacts associated conflicting with or obstructing implementation of the applicable air quality plans under Alternative B would be less than significant and similar to the less-than-significant impacts of the Project.

Although less construction may occur overall under Alternative B as compared to the Project, maximum daily emissions would be similar to what would occur under the Project since the nature and magnitude of individual construction projects would be similar. Therefore, similar to the Project, it is reasonable to assume that development under Alternative B would result in construction emissions of NO_X that would not exceed SCAQMD regional and local significance thresholds, and emissions of PM_{10} and $PM_{2.5}$ that would not exceed SCAQMD LSTs. Similarly, because less development would occur under Alternative B, it is reasonable to assume that overall operational emissions would be less within the Project area as compared to the Project. However, growth would likely occur elsewhere in the City and potentially result in increased operational emissions outside of the Project area. Regardless, similar to the Project, the increase in development in the Specific Plan area accommodated by Alternative B would result in daily emissions of VOC that would not exceed the SCAQMD regional significance thresholds. In addition, future development in the Project area accommodated by Alternative B, which is less than what the Project proposes, would result in daily emissions of NO_x, PM_{10} and $PM_{2.5}$ from area sources and mobile sources that would not exceed the SCAQMD regional significance thresholds. Additionally, it is reasonable to assume that exposure of sensitive receptors to temporary construction emissions would be less with Alternative B because less overall construction may occur. Exposure to odors would also be similar to the less than significant impact identified for the Project. Therefore, construction and operational air quality impacts under Alternative B would be less than significant, and less than the less-than-significant impacts of the Project.

(c) Cultural Resources

In the Project area, which is expected to experience substantial new development, individual reasonably anticipated development could potentially cause a substantial adverse change in or disturbance of historical resources and archeological resources. As with the Project, Alternative

B may result in demolition or alteration of historical resources or their setting or disturb areas that may potentially contain archaeological resources. Furthermore, development under either Alternative B or the Project would have the potential to disturb archaeological resources and/or human remains. All future development projects would continue to be subject to existing federal, State, and local requirements with respect to cultural resources and discretionary projects may be subject to project-specific mitigation requirements under CEQA. All future development projects would continue to be subject to existing federal, State, and local requirements with respect to cultural resources and discretionary projects may be subject to project-specific mitigation requirements under CEQA. Under the Project, implementation of **MM CUL-1,** which requires that in the event that the City requires additional documentation to record potential impacts on historic resources and applicable mitigation measures, the applicant shall be required to prepare a HRAR, **MM CUL-2**, which includes preparation and implementation of a WEAP, and **MM CUL-3**, which requires that all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, would reduce the potential to disturb archaeological resources and human remains. In addition, although existing regulations provide certain protections for significant historical resources, individual developments allowed by Alternative B could potentially cause a substantial adverse change in or disturbance of historical and archaeological resources as defined in CEQA Guidelines Section 15064.5. Therefore, the development that could occur under Alternative B would impose similar Mitigation Measures and the potential for disturbance of cultural resources would be the same as under the Project. Overall, impacts would be less than significant under Alternative B, as with the Project.

(d) Energy

As compared to the Project, development under Alternative B would result in less transportation energy use and less electricity and natural gas consumption than the Project in 2040. However, on a per capita basis, Alternative B would result in more transportation energy use and more electricity and natural gas consumption than the Project because of the increased job opportunities coupled with reduced housing density in the Project area. Because Alternative B would consume less energy overall, but more energy than the Project on a per capita basis, it may result in incrementally greater impacts with respect to the inefficient, unnecessary, or wasteful direct or indirect consumption of energy as compared to the Project. Nevertheless, as with the Project, Alternative B would not result in energy demands that exceed the existing or planned capacity for the service area or the wider Southern California region. In addition, neither Alternative B nor the Project would conflict with applicable federal, State, or local energy conservation policies aimed at reducing reliance on fossil fuels and increasing reliance on renewable energy sources. As such, the impact of Alternative B with regard to energy consumption would be less than significant but greater than the less-than-significant impacts of the Project.

(e) Geology and Soils

Implementation of the City's current General Plan and the proposed update to the Specific Plan would generally accommodate development in the same footprints as existing structures in the Project area. Therefore, similar to the Project, Alternative B would have the potential to disturb

paleontological resources to the same degree. Implementation of the Project's **MM GEO-1** would reduce the potential to disturb or damage paleontological resources. As similar federal regulations are required for future development within the Specific Plan area, the potential for disturbance of paleontological resources would remain less than significant with Alternative B. Therefore, impacts associated with disturbance of paleontological resources under Alternative B would be less than significant and similar to the less-than-significant impacts of the Project.

(f) Greenhouse Gas Emissions

Development accommodated by either Alternative B or the Project would generate greenhouse emissions through individual project construction and operation. GHG emission would be generated by direct sources such as motor vehicles, natural gas consumption, solid waste handling/treatment, and indirect sources such as electricity generation. Alternative B would accommodate a 25 percent reduction in development overall than the Project and would result in fewer GHG emissions in the Project area. However, it would accommodate less intense development and associated growth in the Project area, which may result in more population and housing growth elsewhere in the City and region where fewer transit options are available and the distances between residences, jobs, and services are greater. Additionally, the reduced dwelling units with close access to employment centers under Alternative B would increase per capita VMT and transportation related GHG emissions. As a result, overall Citywide and regional GHG emissions as a function of VMT may increase. Overall GHG emissions would be incrementally greater than those of the Project. As such, the impact of Alternative B with regard to GHG emissions would be less than significant but greater than the less-than-significant impacts of the Project.

(g) Hazards and Hazardous Materials

Alternative B would generally accommodate a similar development pattern to the current Specific Plan although it would be at a lower density. Similar to the Project, operational activities associated with development under Alternative B would not create increased potential for upset or accident conditions involving hazardous materials released into the environment. Therefore, impacts associated with the upset or accident conditions involving hazardous materials under Alternative B would be less than significant and similar to the less-than-significant impacts of the Project.

Similar to the Project, this alternative would pose less than significant issues related to airports or emergency management plans. As under the Project, development under Alternative B could result in development of the three parcels within the Specific Plan area that are located within the AIA for LAX. However, as discussed in **Section IV.G, Hazards and Hazardous Materials**, of this EIR, the parcels are located outside of the regulatory 65 CNEL noise contour and they are not within established flightpaths nor near a runway protection zone of the airport. Moreover, because development on these parcels under Alternative B would also be subject to the existing land use designations, zoning, and height limitations that the Los Angeles County ALUC concluded did not result in impacts of concern, development under Alternative B would also not result in impacts of concern. In addition, development of these parcels under Alternative B would be subject to the same Federal Aviation Administration notification standards and notification requirements. As

such, as with the Project, impacts related to airport proximity under Alternative B would also be less than significant. Furthermore, implementation of Alternative B would not interfere with the City's adopted EOP. Therefore, similar to the Project no impacts related to airports would occur and less than significant impacts related to emergency management plans would occur.

As with the Project, redevelopment, renovation, and demolition of structures built before 1979 could potentially involve asbestos or lead but asbestos and lead would not be released into the atmosphere with compliance of existing regulations. Grading and construction activity could also potentially result in the release of soil and/or groundwater contamination, which could potentially affect schools and result in exposure of Project area construction workers and occupants of neighboring properties, and on-site occupants during operation to releases of hazardous materials. Compliance with applicable regulations would reduce such impacts to a less than significant level. As with the Project, grading and construction activity could potentially result in the release of soil and/or groundwater contamination or involve a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. Overall impacts associated with Alternative B would be similar to, but slightly less than, those of the Project since the overall level of development would be lower. Adherence to Mitigation Measures **MM HAZ-1**, as discussed in **Section IV.G, Hazards and Hazardous Materials**, of this Draft EIR, would reduce impacts to less than significant. As Alternative B would have the same mitigation measure, the potential for exposure to contaminants to the public due to possible construction on hazardous sites, and release of hazardous emissions would be similar to the Project and would be less than significant.

(h) Land Use and Planning

Under this alternative, impacts to land use and planning would be similar to those analyzed in this Draft EIR for the Specific Plan area, albeit to a lesser degree. Alternative B would accommodate the greater residential development capacity that could occur within the Specific Plan area under the Project through the addition of land use and zoning changes, although to a lesser degree. Furthermore, similar to the Project, Alternative B would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area.

Like the Project, Alternative B would be generally consistent with 2020-2045 RTP/SCS policies related to the provision of residential development to nearby major employers, including LAX, energy/gas/oil and aerospace companies and near the City's "super block" development, which contains a mixture of office and research and development uses, thereby reducing travel demands by developing a mix of residential housing opportunities in proximity to employment centers. However, as discussed under Air Quality, Alternative B may implement 2020-2045 RTP/SCS, AQMP, and Air Quality Element policies related to concentrating development near transit and reducing regional VMT to a slightly lesser degree than the Project since the lower overall residential development totals may result in increased residential development elsewhere

in the City and incrementally higher VMT in the Project area. As such, the impact of Alternative B would be less than significant but greater than the less-than-significant impacts of the Project.

(i) Noise

Any future development in the Project area would include mechanical equipment, loading, trash pick-up, and other noise-generating activities. However, such activities would be typical of the urban environment in the Project area. In addition, any on-site activities would be required to comply with applicable provisions of the ESMC. Future development accommodated by either Alternative B or the Project would also increase vehicle trips in the Project area that would generate mobile noise. However, as described in **Section IV.I, Noise**, of this Draft EIR, based on the Project's estimated trip generation and distribution, it is not anticipated that the Downtown Specific Plan Update would result in substantial noise increases from traffic generated by future projects implemented under the Specific Plan Update. Therefore, as Alternative B would result in a reduced amount of development, permanent noise increases due to mobile operational activities under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

All construction would be required to comply with the noise regulations established in the ESMC, including Section 7-2-4C, 7-2-10(D), and Section 7-2-13. Therefore, similar to the Project, the City's noises standards and future projects' compliance therewith would ensure that noise-sensitive receptors are protected against substantial noise increases from construction activities under Alternative B. Therefore, as Alternative B would result in a reduced amount of development, impacts temporary construction noise resulting from implementation of Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

Any future construction activity, specifically pile driving, could potentially generate vibration exceeding the 90 VdB threshold for buildings extremely susceptible to building damage (e.g., historical structures). Similar to the Project, under Alternative B the City would review individual development proposals for compliance with ESMC Section 7-2-10(D), which prohibits construction-related groundborne vibration levels that endanger the public health, welfare, and safety. Compliance with this regulatory requirement, as well as the application of project-specific mitigation measures for future projects in the Specific Plan area as necessary (e.g., utilizing alternative construction equipment/techniques such as auger drilling instead of pile driving), would ensure that future projects do not expose buildings to potentially damaging levels of groundborne vibration or levels capable of causing severe human annoyance. Therefore, as Alternative B would result in a reduced amount of development, impacts from construction-related vibration resulting from implementation of Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

Similar to the Project, it is not anticipated that new development in the Project area under Alternative B would involve activities that would result in substantial vibration levels (e.g., heavy equipment or industrial operations). Operations of the retail, restaurant, office, medical office, and residential uses would not contain such vibration sources. Similar to the Project, future development projects under Alternative B would be required to comply with ESMC Section 7-2-9, which would ensure that future projects would be prohibited from exposing buildings to potentially

damaging levels of groundborne vibration or levels capable of causing human annoyance. Therefore, as Alternative B would result in a reduced amount of development, impacts from operational vibration resulting from implementation of Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(j) Population and Housing

Alternative B would accommodate the greater residential development capacity that could occur within the Specific Plan area under the Project through the addition of land use and zoning changes, although to a lesser degree. The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. Alternative B would allow for increase of up to 97,500 square feet of retail and restaurant uses, 150,000 square feet of office uses, 18,000 square feet of medical office uses, and 225 residential units. As such, although Alternative B would not implement RTP/SCS policies related to jobs/housing balance and concentrating growth and development near transit to the same degree that the Project would. Similar to the Project, Alternative B would not result in significant impacts related population, housing, or employment growth. When compared to Alternative B, the Project would result in an overall higher increase in housing. Therefore, the 25 percent reduction in housing development in the Project area as would occur under Alternative B may result in increased housing development elsewhere in the City, which could potentially increase displacement of existing housing in other El Segundo neighborhoods. Like the Project, Alternative B would not induce substantial population growth inconsistent with the regional growth plans. Therefore, impacts associated with population and housing under Alternative B would be less than significant and similar to the less-than-significant impacts of the Project.

(k) Public Services

(i) Fire Protection

Implementation of Alternative B would involve less overall development and associated growth than the Project. Nevertheless, the increased growth under either scenario may require additional fire protection services to serve new residents. With respect to fire protection services, both Alternative B or the Project would accommodate new development that would increase demand for fire protection service. This may result in the need for new or expanded fire facilities. Based on the urbanized character of the Project area, it is anticipated that new or expanded facilities could be built without creating significant environmental impacts. Depending on the location or nature of new facilities, the construction of needed new facilities could potentially result in impacts; however, like the Project, those impacts would be consistent with those already identified in this Draft EIR for construction or operations. Project-specific environmental analysis under CEQA would be required to address any site-specific environmental concerns. Therefore, impacts associated with fire protection under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(ii) Police Protection

Implementation of Alternative B would involve less overall development and associated growth than the Project. Nevertheless, the increased growth under either scenario may require additional police protection services to serve new residents. With respect to police protection services, both Alternative B or the Project would accommodate new development that would increase demand for police protection service. This may result in the need for new or expanded police facilities. Based on the urbanized character of the Project area, it is anticipated that new or expanded facilities could be built without creating significant environmental impacts. Depending on the location or nature of new facilities, the construction of needed new facilities could potentially result in impacts; however, like the Project, those impacts would be consistent with those already identified in this Draft EIR for construction or operations. Project-specific environmental analysis under CEQA would be required to address any site-specific environmental concerns. Therefore, impacts associated with police protection under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(iii) Schools

Alternative B would accommodate a greater residential development capacity than could occur within the Specific Plan area under the Project through the addition of land use and zoning changes, although to a lesser degree. The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. Alternative B would allow for increase of up to 97,500 square feet of retail and restaurant uses, 150,000 square feet of office uses, 18,000 square feet of medical office uses, and 225 residential units. As such, Alternative B would accommodate development that would increase the student population of the Specific Plan area and would create the need for new or expanded school facilities, but to a lesser extent than the Project. As with the Project, developers would be required to pay applicable school impact fees. As with the Project, any impacts associated with new school construction would be similar to those analyzed and identified in the Draft EIR for other types of development, any site-specific impacts would be speculative and would be addressed by ESUSD as part of a project-level CEQA review. Therefore, impacts associated with schools under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(iv) Parks and Recreation

Implementation of Alternative B would involve less overall development and associated population increases than the Project. However, any new development would increase the use of existing park and recreational facilities throughout the City, including in and around adjacent to the Project area. The State of California Parks Department (State Parks) typically uses a 3.0-acres-per-1,000-residents ratio as a standard of park space within communities. Based on the U.S. Census count of 17,272 City residents in 2020 (see **Section IV.J, Population and Housing**), there are approximately 4.6 acres of qualified City-owned park space per 1,000 residents, and approximately 6.2 acres of total qualified park space (including El Segundo Beach) per 1,000 residents. Both the City-owned ratio and total ratio exceed the State Parks standard. Under

Alternative B, the Project area population would be less when compared to the Project. Therefore, since the City's Parks exceed the State of California Parks Department standard of park space at about 4.6 acres of qualified City-owned park space per 1,000 residents, and approximately 6.2 acres of total qualified park space (including El Segundo Beach) per 1,000 residents, the additional residents proposed under Alternative B would not result in a substantial reduction in existing standards of service for parks. Therefore, impacts associated with deterioration of existing parks in and around the Project area under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

Reasonably expected development from Alternative B would increase demand for recreational and park facilities that serve the Project area but would not require construction of new recreational or park facilities. Furthermore, based on the urban nature of the Project area and the presence of constraints to the development of large park facilities, the construction and operation of new facilities would not be expected to result in significant environmental impacts. Therefore, impacts from the construction or expansion of new recreational facilities under Alternative B would be less than significant and similar to the less-than-significant impacts of the Project.

(v) Libraries

Implementation of Alternative B would involve less overall development and associated population increases than the Project. With respect to libraries, Alternative B would increase demand for library facilities, although to lesser degree than the Project. The Project area is well served by library facilities and would not require the construction of new or expanded facilities. Therefore, impacts associated with libraries under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(l) Transportation

Alternative B would continue to generate traffic from residents traveling to and from the Specific Plan area. However, the Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. Alternative B would allow for increase of up to 97,500 square feet of retail and restaurant uses, 150,000 square feet of office uses, 18,000 square feet of medical office uses, and 225 residential units. Regardless, the increased job opportunities coupled with reduced housing density in the Project area under Alternative B would result in incrementally higher VMT. Similar to the Project, Alternative B would not impact existing transit service and alternative transportation facilities within the Specific Plan area. Therefore, impacts associated with transportation under Alternative B would be less than significant and more than the less-than-significant impacts of the Project.

(m) Tribal Cultural Resources

As described in **Section IV.M, Tribal Cultural Resources**, of this Draft EIR, Los Angeles has a long history of Native American occupation, and any development activities that include ground disturbance have the potential to significantly impact tribal cultural resources. Effects on tribal cultural resources are only known once a specific development has been proposed because the

effects are highly dependent on both the individual development site conditions and the characteristics of the proposed activity. Development accommodated by either Alternative B or the Project may disturb areas that potentially contain tribal resources. Similar to the Project, all future development projects under Alternative B would continue to be subject to existing federal, State, and local requirements and discretionary projects, subject to CEQA review would be required to comply with AB 52, which for projects relying on a [mitigated] negative declaration or an EIR, would require consultation with California Native American tribes. Implementation of the Project's **MM TCR-1** would reduce the potential to disturb or damage tribal cultural resources. Therefore, as similar federal regulations are required for future development within the existing Specific Plan area, impacts associated with disturbance of tribal cultural resources under Alternative B would be less than significant and similar to the less-than-significant impacts of the Project.

(n) Utility and Service Systems

(i) Water

With respect to water demand, per the 2020 Urban Water Management Plan, current water supplies, planned future water conservation efforts, and planned future water supplies will enable the City to reliably provide water that meets the demands of the City for a 25-year planning horizon (through 2040). According to the City UWMP, water demands are projected to be 13,570, 12,743, 12,009, and 11,340 acre feet per year (afy) for the years 2025, 2030, 2035, and 2040, respectively.[5] Alternative B would accommodate a 25 percent reduction in development overall than the Project. The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. The Project's estimated consumption of 248 AFY would represent 1.83, 1.95, 2.07, and 2.19 percent of the projected demands for these years, respectively, and would therefore, not be a significant increase in water demand. Alternative B would demand 25 percent less water as compared to the Project. Therefore, as with the Project, adequate water supply exists to meet projected demand through the year 2040 for Alternative B and development of new water supplies would not be necessary. Expansion/replacement of water distribution infrastructure may be needed, but temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Thus, impacts to water resources under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(ii) Wastewater

Implementation of Alternative B would involve 25 percent less overall development and associated growth than would be anticipated under the Project. The Project's maximum wastewater flow of 221,600 gpd (0.22 mgd) would represent approximately 0.09 percent of the current remaining capacities of the Hyperion Sanitary Sewer System and approximately 0.13 percent of the current remaining capacity of the HWRP. Therefore, as the implementation of

[5] *City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021.*

Alternative B would generate less wastewater as compared to the Project the HWRP would have sufficient available treatment capacity to serve the Project area under Alternative B. In addition, the HWRP would be able to adequately treat future project-generated sewage under Alternative B and the treatment requirements of the RWQCB would not be exceeded so new or expanded treatment facilities would not be needed. Expansion/replacement of Project area conveyance infrastructure may be needed and various facility improvements are already planned. Temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Continued compliance with the City's LID Ordinance for all new development would ensure that any future development under Alternative B would not increase demands on stormwater drainage facilities and or expansion of existing facilities beyond specific improvements needed for individual development projects. Thus, impacts to wastewater facilities under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(iii) Solid Waste

There are three landfills within approximately 35 miles of the Project area: Scholl Canyon landfill; Burbank Landfill Site No. 3; and Calabasas landfill. Collectively, these nearby landfills have a permitted daily capacity of 7,140 tons per day and an average daily intake of 2,486 tons per day. The amount of solid waste that could potentially be generated by the Project would represent 0.04 percent of the daily permitted capacity and 0.06 percent of the remaining daily capacity after accounting for the existing average daily intake for the three closest landfills. Implementation of Alternative B would involve less overall development and associated growth than would be anticipated under the Project. With that said, Alternative B would generate less waste than the Project. Furthermore, all 10 existing Class III landfills within Los Angeles County have a collective maximum daily permitted capacity of 45,297 tons per day, an average daily disposal intake of 19,291 tons per day, and an estimated remaining permitted total capacity of 142.67 million tons. Therefore, sufficient permitted capacity is available to accommodate the County's long-term disposal needs under the status quo and sufficient permitted capacity is available to accommodate the Project area's solid waste disposal needs. Therefore, as with the Project, implementation of Alternative B would result in solid waste generation that would remain within the capacity of waste disposal facilities serving the City, new or expanded facilities would not be needed. Thus, impacts to solid waste facilities under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(iv) Energy Infrastructure

Implementation of Alternative B would involve less overall development and associated growth than would be anticipated under the Project. With that said, Alternative B would consume less energy than the Project. Similar to the Project, electrical and natural gas supplies are not expected to be adversely affected by development under Alternative B, but improvements to Project area distribution and telecommunication facilities may be needed. Temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Thus, impacts to energy infrastructure under Alternative B would be less than significant and less than the less-than-significant impacts of the Project.

(3) Relationship to Project Objectives

Alternative B would accommodate greater residential development capacity than could occur within the Specific Plan area under the Project through the addition of land use and zoning changes, although to a lesser degree. Furthermore, similar to the Project, Alternative B would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area. In addition, Alternative B would not include the same regulations and incentives as the Project intended to promote affordable and low-income income housing and would result in less of those housing options being developed. Furthermore, Alternative B may implement 2020-2045 RTP/SCS, AQMP, and Air Quality Element policies related to concentrating development near transit and reducing regional VMT to a lesser degree than the Project since the lower overall residential development totals may result in increased residential development elsewhere in the City and incrementally higher VMT in the Project area.

Specifically, Alternative B would achieve the basic Project objectives, but to a lesser degree:

- To provide an Update to the Adopted Downtown Specific Plan that will guide the future development of the Specific Plan area and provides land use and development standards, identifies improvements in the public realm, and provides a plan for infrastructure and public services to accommodate potential development.
- To promote the unique small-town “village” character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing.
- To attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers.
- To promote a range of housing options with opportunities for all incomes.
- To improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.

(4) Reduction of Significant Impacts

Table VI-2, Comparison of Project and Alternatives Impacts, summarizes the impact comparison of the Project and its alternatives. The Project is noted for avoiding significant unavoidable impacts. On the other hand, Alternative B further diminishes less-than-significant impacts in various Project areas but introduces increased impacts concerning energy, greenhouse gas emissions, land use and planning, and transportation. Additionally, Alternative B would achieve the basic Project objectives, but to a lesser degree.

c) Alternative C – Adopted El Segundo Specific Plan Boundary Alternative

(1) Description

The purpose of the Adopted El Segundo Specific Plan Boundary Alternative is to potentially avoid or substantially lessen the Project's significant impacts by reducing the overall development as compared to the Project. The Project proposes to expand the existing Downtown Specific Plan Area boundaries to include eight parcels in the Grand Avenue area. Amendments to the Land Use Element of the City's General Plan to change the land use designation on the eight parcels in the Grand Avenue area from Downtown Commercial to Downtown Specific Plan would be required. The Project would also amend the City's zoning map to change the zoning on these eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP). Alternative C would not expand the Specific Plan area to these Grand Avenue parcels and, as a result, the Grand Avenue area would be reduced under Alternative C.

The idea behind the amendments in the Land Use Element of the City's General Plan and zoning is to create allowable densities that are high enough to facilitate market-driven redevelopment and allow for the flexibility to develop desirable land uses. Therefore, under Alternative C, overall development would be reduced when compared to the Project as the Grand Avenue area would not include the eight additional parcels as proposed under the Project.

Similar to the Project, Alternative C would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area. Alternative C would reduce the amount of excavation and hauling of soil as compared to the Project due to less overall development, which would lessen the impacts related to air quality emissions during construction and Project-level noise from construction. Alternative C's other impacts would be either less than or similar to the Project's impacts.

The potential environmental impacts associated with Alternative C are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

(2) Comparative Analysis

Alternative C assumes the development of the Related Project listed in **Section II.5, Related Projects**. The potential environmental impacts associated with Alternative C are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in **Section IV, Environmental Impact Analysis,** of this Draft EIR.

(a) Aesthetics

A reduced quantity of overall structures and landscaping would be introduced to the Specific Plan Grand Avenue area as this alternative would not include the eight additional parcels as proposed

under the Project. Alternative C would generally accommodate a similar development pattern to the current Specific Plan. However, the reduction in the overall area of the Specific Plan would likely result in fewer changes to visual character of the Downtown area. Similar to the Project, any development under Alternative C would be implemented in accordance with applicable State and local plans, policies and guidelines including, but not limited to, the City's General Plan, Downtown Specific Plan, and provisions of the ESMC as it relates to development standards, design guidelines, and landscaping and streetscape requirements intended to enhance the visual quality of the area. Like the Project, Alternative C could introduce new sources of light and glare in the Project area, as new development is approved. However, development in most of the Project area already experiences high levels of nighttime lighting and glare, such that any additional effects would be incremental. In addition, future development would be required to comply with existing CBC regulations pertaining to lighting, as adopted by reference pursuant to Chapter 13-1-1 of the ESMC. As with the Project, development accommodated by Alternative C may benefit, and would generally enhance, the visual character of the Project area, but at a reduced amount, as it does not include the eight additional parcels, as compared to the Project. Therefore, visual character and some obstruction of scenic view impacts under Alternative C would be less than significant, and more than the less-than-significant impacts of the Project.

(b) Air Quality

Alternative C would accommodate less overall housing development and associated population growth than the Project, as this alternative would not include the eight additional parcels in Specific Plan Grand Avenue area as proposed under the Project. However, like the Project, Alternative C would generate growth that is consistent with the 2020-2045 RTP/SCS forecasts at a Citywide level and as a result, would not conflict with and obstruct implementation of the 2020-2045 RTP/SCS. Therefore, impacts associated conflicting with or obstructing implementation of the applicable air quality plans under Alternative C would be less than significant and similar to the less-than-significant impacts of the Project.

Less construction would occur overall under Alternative C as compared to the Project, and therefore, maximum daily emissions would be less to what would occur under the Project. Therefore, similar to the Project, it is reasonable to assume that development under Alternative C would result in construction emissions of NO_X that would not exceed SCAQMD regional and local significance thresholds, and emissions of PM_{10} and $PM_{2.5}$ that would not exceed SCAQMD LSTs. Similarly, because less development would occur under Alternative C, it is reasonable to assume that overall operational emissions would be less within the Project area as compared to the Project. However, growth would likely occur elsewhere in the City and potentially result in increased operational emissions outside of the Project area. Regardless, similar to the Project, the increase in development in the Specific Plan area accommodated by Alternative C would result in daily emissions of VOC that would not exceed the SCAQMD regional significance thresholds. In addition, future development in the Project area accommodated by Alternative C, which is less than what the Project proposes, would result in daily emissions of NO_x, PM_{10} and $PM_{2.5}$ from area sources and mobile sources that would not exceed the SCAQMD regional significance thresholds. Additionally, it is reasonable to assume that exposure of sensitive receptors to temporary construction emissions would be less with Alternative C because less

overall construction may occur. Exposure to odors would also be similar to the less than significant impact identified for the Project. Therefore, construction and operational air quality impacts under Alternative C would be less than significant, and less than the less-than-significant impacts of the Project.

(c) Cultural Resources

In the Project area, which is expected to experience substantial new development, individual reasonably anticipated development could potentially cause a substantial adverse change in or disturbance of historical resources and archeological resources. As with the Project, Alternative C may result in demolition or alteration of historical resources or their setting or disturb areas that may potentially contain archaeological resources. Furthermore, development under either Alternative C or the Project would have the potential to disturb archaeological resources and/or human remains. All future development projects would continue to be subject to existing federal, State, and local requirements with respect to cultural resources and discretionary projects may be subject to project-specific mitigation requirements under CEQA. All future development projects would continue to be subject to existing federal, State, and local requirements with respect to cultural resources and discretionary projects may be subject to project-specific mitigation requirements under CEQA. Under the Project, implementation of **MM CUL-1,** which requires that in the event that the City requires additional documentation to record potential impacts on historic resources and applicable mitigation measures, the applicant shall be required to prepare a HRAR, **MM CUL-2**, which includes preparation and implementation of a WEAP, and **MM CUL-3**, which requires that all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, would reduce the potential to disturb archaeological resources and human remains. In addition, although existing regulations provide certain protections for significant historical resources, individual developments allowed by Alternative C could potentially cause a substantial adverse change in or disturbance of historical and archaeological resources as defined in CEQA Guidelines Section 15064.5. Therefore, the development that could occur under Alternative C would impose similar Mitigation Measures and the potential for disturbance of cultural resources would be the same as under the Project. Overall, impacts would be less than significant under Alternative C, as with the Project.

(d) Energy

As compared to the Project, development under Alternative C would result in less transportation energy use and less electricity and natural gas consumption than the Project in 2040. However, on a per capita basis, Alternative C would result in more transportation energy use and more electricity and natural gas consumption than the Project because of the increased job opportunities coupled with reduced housing density in the Project area. Because Alternative C would consume less energy overall, but more energy than the Project on a per capita basis, it may result incrementally greater impacts with respect to the inefficient, unnecessary, or wasteful direct or indirect consumption of energy as compared to the Project. Nevertheless, as with the Project, Alternative C would not result in energy demands that exceed the existing or planned capacity for the service area or the wider Southern California region. In addition, neither Alternative C nor the Project would conflict with applicable federal, State, or local energy

conservation policies aimed at reducing reliance on fossil fuels and increasing reliance on renewable energy sources. As such, the impact of Alternative C with regard to energy consumption would be less than significant but greater than the less-than-significant impacts of the Project.

(e) Geology and Soils

Implementation of the City's current General Plan and the proposed update to the Specific Plan would generally accommodate development in the same footprints as existing structures in the Project area. Therefore, similar to the Project, Alternative C would have the potential to disturb paleontological resources to the same degree. Implementation of the Project's **MM GEO-1** would reduce the potential to disturb or damage paleontological resources. As similar federal regulations are required for future development within the Specific Plan area, the potential for disturbance of paleontological resources would remain less than significant with Alternative C. Therefore, impacts associated with disturbance of paleontological resources under Alternative C would be less than significant and similar to the less-than-significant impacts of the Project.

(f) Greenhouse Gas Emissions

Development accommodated by either Alternative C or the Project would generate GHG emissions through individual project construction and operation. GHG emissions would be generated by direct sources such as motor vehicles, natural gas consumption, solid waste handling/treatment, and indirect sources such as electricity generation. Alternative C would accommodate a reduction in development overall when compared to the Project and would result in fewer GHG emissions in the Project area. However, it would accommodate less intense development and associated growth on the eight parcels in the Grand Avenue area, which may result in more population and housing growth elsewhere in the City and region where fewer transit options are available and the distances between residences, jobs, and services are greater. Additionally, there could be a reduction in overall dwelling units with close access to employment centers under Alternative C, which would increase per capita VMT and transportation related GHG emissions. As a result, overall Citywide and regional GHG emissions as a function of VMT may increase. Overall, GHG emissions would be incrementally greater than those of the Project. As such, the impact of Alternative C with regard to GHG emissions would be less than significant but greater than the less-than-significant impacts of the Project.

(g) Hazards and Hazardous Materials

Alternative C would generally accommodate a similar development pattern to the current Specific Plan although it would not include the eight additional parcels in Specific Plan Grand Avenue area as proposed under the Project. Similar to the Project, operational activities associated with development under Alternative C would not create increased potential for upset or accident conditions involving hazardous materials released into the environment. Therefore, impacts associated with the upset or accident conditions involving hazardous materials under Alternative C would be less than significant and similar to the less-than-significant impacts of the Project.

Similar to the Project, this alternative would pose less than significant issues related to airports or emergency management plans. As under the Project, development under Alternative C could result in development of the three parcels within the Specific Plan area that are located within the AIA for LAX. However, as discussed in **Section IV.G, Hazards and Hazardous Materials**, of this EIR, the parcels are located outside of the regulatory 65 CNEL noise contour and they are not within established flightpaths nor near a runway protection zone of the airport. Moreover, because development on these parcels under Alternative C would also be subject to the existing land use designations, zoning, and height limitations that the Los Angeles County ALUC concluded did not result in impacts of concern, development under Alternative C would also not result in impacts of concern. In addition, development of these parcels under Alternative C would be subject to the same Federal Aviation Administration notification standards and notification requirements. As such, as with the Project, impacts related to airport proximity under Alternative C would also be less than significant. Furthermore, implementation of Alternative C would not interfere with the City's adopted EOP. Therefore, similar to the Project no impacts related to airports would occur and less than significant impacts related to emergency management plans would occur.

As with the Project, redevelopment, renovation, and demolition of structures built before 1979 could potentially involve asbestos or lead but asbestos and lead would not be released into the atmosphere with compliance of existing regulations. Grading and construction activity could also potentially result in the release of soil and/or groundwater contamination, which could potentially affect schools and result in exposure of Project area construction workers and occupants of neighboring properties, and on-site occupants during operation to releases of hazardous materials. Compliance with applicable regulations would reduce such impacts to a less than significant level. As with the Project, grading and construction activity could potentially result in the release of soil and/or groundwater contamination or involve a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. Overall impacts associated with Alternative C would be similar to, but slightly less than, those of the Project since the overall level of development would be lower. Adherence to Mitigation Measures **MM HAZ-1**, as discussed in **Section IV.G, Hazards and Hazardous Materials**, of this Draft EIR, would reduce impacts to less than significant. As Alternative C would have the same mitigation measure, the potential for exposure to contaminants to the public due to possible construction on hazardous sites, and release of hazardous emissions would be similar to the Project and would be less than significant.

(h) Land Use and Planning

Under this alternative, impacts to land use and planning would be similar to those analyzed in this Draft EIR for the Specific Plan area, albeit to a lesser degree. The Project proposes amendments to the Land Use Element of the City's General Plan to change the land use designation on eight parcels, in the Grand Avenue area, from Downtown Commercial to Downtown Specific Plan. The Project would also amend the City's zoning map to change the zoning on these eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP). The Grand Avenue area would be reduced under Alternative C and not include those eight parcels. Therefore, Alternative C would accommodate the greater residential development capacity that could occur within the Specific Plan area under the Project through the addition of land use and zoning changes,

although to a lesser degree. Furthermore, similar to the Project, Alternative C would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area. However, these improvements would be to a lesser degree, as the eight additional parcels, which are located on the eastern end of Grand Avenue, would not be included as part this alternative.

Like the Project, Alternative C would be generally consistent with 2020-2045 RTP/SCS policies related to the provision of residential development to nearby major employers, including LAX, energy/gas/oil and aerospace companies and near the City's "super block" development, which contains a mixture of office and research and development uses, thereby reducing travel demands by developing a mix of residential housing opportunities in proximity to employment centers. However, as discussed under Air Quality, Alternative C may implement 2020-2045 RTP/SCS, AQMP, and Air Quality Element policies related to concentrating development near transit and reducing regional VMT. However, this reduction would be to a slightly lesser degree than the Project since the lower overall residential development totals may result in increased residential development elsewhere in the City and incrementally higher VMT in the Project area. As such, the impact of Alternative C would be less than significant but greater than the less-than-significant impacts of the Project.

(i) Noise

Any future development in the Project area would include mechanical equipment, loading, trash pick-up, and other noise-generating activities. However, such activities would be typical of the urban environment in the Project area. In addition, any on-site activities would be required to comply with applicable provisions of the ESMC. Future development accommodated by either Alternative C or the Project would also increase vehicle trips in the Project area that would generate mobile noise. However, as described in **Section IV.I, Noise**, of this Draft EIR, based on the Project's estimated trip generation and distribution, it is not anticipated that the Downtown Specific Plan Update would result in substantial noise increases from traffic generated by future projects implemented under the Specific Plan Update. Therefore, as Alternative C would result in a reduced amount of development, permanent noise increases due to mobile operational activities under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

All construction would be required to comply with the noise regulations established in the ESMC, including Section 7-2-4C, 7-2-10(D), and Section 7-2-13. Therefore, similar to the Project, the City's noises standards and future projects' compliance therewith would ensure that noise-sensitive receptors are protected against substantial noise increases from construction activities under Alternative C. Therefore, as Alternative C would result in a reduced amount of development, impacts temporary construction noise resulting from implementation of Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

Any future construction activity, specifically pile driving, could potentially generate vibration exceeding the 90 VdB threshold for buildings extremely susceptible to building damage (e.g.,

historical structures). Similar to the Project, under Alternative C the City would review individual development proposals for compliance with ESMC Section 7-2-10(D), which prohibits construction-related groundborne vibration levels that endanger the public health, welfare, and safety. Compliance with this regulatory requirement, as well as the application of project-specific mitigation measures for future projects in the Specific Plan area as necessary (e.g., utilizing alternative construction equipment/techniques such as auger drilling instead of pile driving), would ensure that future projects do not expose buildings to potentially damaging levels of groundborne vibration or levels capable of causing severe human annoyance. Therefore, as Alternative C would result in a reduced amount of development, impacts from construction-related vibration resulting from implementation of Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

Similar to the Project, it is not anticipated that new development in the Project area under Alternative C would involve activities that would result in substantial vibration levels (e.g., heavy equipment or industrial operations). Operations of the retail, restaurant, office, medical office, and residential uses would not contain such vibration sources. Similar to the Project, future development projects under Alternative C would be required to comply with ESMC Section 7-2-9, which would ensure that future projects would be prohibited from exposing buildings to potentially damaging levels of groundborne vibration or levels capable of causing human annoyance. Therefore, as Alternative C would result in a reduced amount of development, impacts from operational vibration resulting from implementation of Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(j) Population and Housing

Alternative C would accommodate the greater residential development capacity that could occur within the Specific Plan area under the Project through the addition of land use and zoning changes, although to a lesser degree. The Grand Avenue area would be reduced under Alternative C, which would not amend the City's zoning map to change the zoning on eight parcels from Downtown Commercial (C-RS) to Downtown Specific Plan (DSP). As such, although Alternative C would not implement RTP/SCS policies related to jobs/housing balance and concentrating growth and development near transit to the same degree that the Project would. Similar to the Project, Alternative C would not result in significant impacts related population, housing, or employment growth. When compared to Alternative C, the Project could result in an overall higher increase in housing. Therefore, the potential reduction in housing development in the Project area as would occur under Alternative C may result in increased housing development elsewhere in the City, which could potentially increase displacement of existing housing in other El Segundo neighborhoods. Like the Project, Alternative C would not induce substantial population growth inconsistent with the regional growth plans. Therefore, impacts associated with population and housing under Alternative C would be less than significant and similar to the less-than-significant impacts of the Project.

(k) Public Services

(i) Fire Protection

Implementation of Alternative C would involve less overall development and associated growth than the Project. Nevertheless, the increased growth under either scenario may require additional fire protection services to serve new residents. With respect to fire protection services, both Alternative C or the Project would accommodate new development that would increase demand for fire protection service. This may result in the need for new or expanded fire facilities. Based on the urbanized character of the Project area, it is anticipated that new or expanded facilities could be built without creating significant environmental impacts. Depending on the location or nature of new facilities, the construction of needed new facilities could potentially result in impacts; however, like the Project, those impacts would be consistent with those already identified in this Draft EIR for construction or operations. Project-specific environmental analysis under CEQA would be required to address any site-specific environmental concerns. Therefore, impacts associated with fire protection under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(ii) Police Protection

Implementation of Alternative C would involve less overall development and associated growth than the Project. Nevertheless, the increased growth under either scenario may require additional police protection services to serve new residents. With respect to police protection services, both Alternative C or the Project would accommodate new development that would increase demand for police protection service. This may result in the need for new or expanded police facilities. Based on the urbanized character of the Project area, it is anticipated that new or expanded facilities could be built without creating significant environmental impacts. Depending on the location or nature of new facilities, the construction of needed new facilities could potentially result in impacts; however, like the Project, those impacts would be consistent with those already identified in this Draft EIR for construction or operations. Project-specific environmental analysis under CEQA would be required to address any site-specific environmental concerns. Therefore, impacts associated with police protection under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(iii) Schools

Alternative C would accommodate the greater residential development capacity that could occur within the Specific Plan area under the Project through the addition of land use and zoning changes, although to a lesser degree. As such, Alternative C would accommodate development that would increase the student population of the Specific Plan area and would create the need for new or expanded school facilities, but to a lesser extent than the Project. As with the Project, developers would be required to pay applicable school impact fees. As with the Project, any impacts associated with new school construction would be similar to those analyzed and identified in the Draft EIR for other types of development, any site-specific impacts would be speculative and would be addressed by ESUSD as part of a project-level CEQA review. Therefore, impacts

associated with schools under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(iv) Parks and Recreation

Implementation of Alternative C would involve less overall development and associated population increases than the Project. However, any new development would increase the use of existing park and recreational facilities throughout the City, including in and around adjacent to the Project area. The State of California Parks Department (State Parks) typically uses a 3.0-acres-per-1,000-residents ratio as a standard of park space within communities. Based on the U.S. Census count of 17,272 City residents in 2020 (see **Section IV.J, Population and Housing**), there are approximately 4.6 acres of qualified City-owned park space per 1,000 residents, and approximately 6.2 acres of total qualified park space (including El Segundo Beach) per 1,000 residents. Both the City-owned ratio and total ratio exceed the State Parks standard. Under Alternative C, the Project area population would be less when compared to the Project. Therefore, since the City's Parks exceed the State of California Parks Department standard of park space at about 4.6 acres of qualified City-owned park space per 1,000 residents, and approximately 6.2 acres of total qualified park space (including El Segundo Beach) per 1,000 residents, the additional residents proposed under Alternative C would not result in a substantial reduction in existing standards of service for parks. Therefore, impacts associated with deterioration of existing parks in and around the Project area under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

Reasonably expected development from Alternative C would increase demand for recreational and park facilities that serve the Project area but would not require construction of new recreational or park facilities. Furthermore, based on the urban nature of the Project area and the presence of constraints to the development of large park facilities, the construction and operation of new facilities would not be expected to result in significant environmental impacts. Therefore, impacts from the construction or expansion of new recreational facilities under Alternative C would be less than significant and similar to the less-than-significant impacts of the Project.

(v) Libraries

Implementation of Alternative C would involve less overall development and associated population increases than the Project. With respect to libraries, Alternative C would increase demand for library facilities, although to lesser degree than the Project. The Project area is well served by library facilities and would not require the construction of new or expanded facilities. Therefore, impacts associated with libraries under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(l) Transportation

Alternative C would continue to generate traffic from residents traveling to and from the Specific Plan area. However, it would accommodate less intense development and associated growth on the eight parcels in the Grand Avenue area, which may result in more population and housing growth elsewhere in the City and region where fewer transit options are available and the

distances between residences, jobs, and services are greater. Additionally, there could be a reduction in overall dwelling units with close access to employment centers under Alternative C. The increased job opportunities coupled with reduced housing density in the Project area under Alternative C would result in incrementally higher VMT. Similar to the Project, Alternative C would not impact existing transit service and alternative transportation facilities within the Specific Plan area. Therefore, impacts associated with transportation under Alternative C would be less than significant and more than the less-than-significant impacts of the Project.

(m) Tribal Cultural Resources

As described in **Section IV.M, Tribal Cultural Resources**, of this Draft EIR, Los Angeles has a long history of Native American occupation, and any development activities that include ground disturbance have the potential to significantly impact tribal cultural resources. Effects on tribal cultural resources are only known once a specific development has been proposed because the effects are highly dependent on both the individual development site conditions and the characteristics of the proposed activity. Development accommodated by either Alternative C or the Project may disturb areas that potentially contain tribal resources. Similar to the Project, all future development projects under Alternative C would continue to be subject to existing federal, State, and local requirements and discretionary projects, subject to CEQA review would be required to comply with AB 52, which for projects relying on a [mitigated] negative declaration or an EIR, would require consultation with California Native American tribes. Implementation of the Project's **MM TCR-1** would reduce the potential to disturb or damage tribal cultural resources. Therefore, as similar federal regulations are required for future development within the existing Specific Plan area, impacts associated with disturbance of tribal cultural resources under Alternative C would be less than significant and similar to the less-than-significant impacts of the Project.

(n) Utility and Service Systems

(i) Water

With respect to water demand, per the 2020 Urban Water Management Plan, current water supplies, planned future water conservation efforts, and planned future water supplies will enable the City to reliably provide water that meets the demands of the City for a 25-year planning horizon (through 2040). According to the City UWMP, water demands are projected to be 13,570, 12,743, 12,009, and 11,340 acre feet per year (afy) for the years 2025, 2030, 2035, and 2040, respectively.[6] Alternative C would accommodate an overall reduction in development when compared to the Project. The Project would allow for increases of up to 130,000 square feet of retail and restaurant uses, 200,000 square feet of office uses, 24,000 square feet of medical office uses, and 300 residential units. The Project's estimated consumption of 248 AFY would represent 1.83, 1.95, 2.07, and 2.19 percent of the projected demands for these years, respectively, and would therefore, not be a significant increase in water demand. Alternative C would demand less water as compared to the Project. Therefore, as with the Project, adequate water supply exists to meet projected demand through the year 2040 for Alternative C and development of new water

[6] *City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021.*

supplies would not be necessary. Expansion/replacement of water distribution infrastructure may be needed, but temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Thus, impacts to water resources under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(ii) Wastewater

Implementation of Alternative C would involve less overall development and associated growth than would be anticipated under the Project. The Project's maximum wastewater flow of 221,600 gpd (0.22 mgd) would represent approximately 0.09 percent of the current remaining capacities of the Hyperion Sanitary Sewer System and approximately 0.13 percent of the current remaining capacity of the HWRP. Therefore, as the implementation of Alternative C would generate less wastewater as compared to the Project the HWRP would have sufficient available treatment capacity to serve the Project area under Alternative C. In addition, the HWRP would be able to adequately treat future project-generated sewage under Alternative C and the treatment requirements of the RWQCB would not be exceeded so new or expanded treatment facilities would not be needed. Expansion/replacement of Project area conveyance infrastructure may be needed and various facility improvements are already planned. Temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Continued compliance with the City's LID Ordinance for all new development would ensure that any future development under Alternative C would not increase demands on stormwater drainage facilities and or expansion of existing facilities beyond specific improvements needed for individual development projects. Thus, impacts to wastewater facilities under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(iii) Solid Waste

There are three landfills within approximately 35 miles of the Project area: Scholl Canyon landfill; Burbank Landfill Site No. 3; and Calabasas landfill. Collectively, these nearby landfills have a permitted daily capacity of 7,140 tons per day and an average daily intake of 2,486 tons per day. The amount of solid waste that could potentially be generated by the Project would represent 0.04 percent of the daily permitted capacity and 0.06 percent of the remaining daily capacity after accounting for the existing average daily intake for the three closest landfills. Implementation of Alternative C would involve less overall development and associated growth than would be anticipated under the Project. With that said, Alternative C would generate less waste than the Project. Furthermore, all 10 existing Class III landfills within Los Angeles County have a collective maximum daily permitted capacity of 45,297 tons per day, an average daily disposal intake of 19,291 tons per day, and an estimated remaining permitted total capacity of 142.67 million tons. Therefore, sufficient permitted capacity is available to accommodate the County's long-term disposal needs under the status quo and sufficient permitted capacity is available to accommodate the Project area's solid waste disposal needs. Therefore, as with the Project, implementation of Alternative C would result in solid waste generation that would remain within the capacity of waste disposal facilities serving the City, new or expanded facilities would not be

needed. Thus, impacts to solid waste facilities under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(iv) Energy Infrastructure

Implementation of Alternative C would involve less overall development and associated growth than would be anticipated under the Project. With that said, Alternative C would consume less energy than the Project. Similar to the Project, electrical and natural gas supplies are not expected to be adversely affected by development under Alternative C, but improvements to Project area distribution and telecommunication facilities may be needed. Temporary traffic, air quality, and noise impacts associated with construction of such improvements would be within the parameters described for the Project. Thus, impacts to energy infrastructure under Alternative C would be less than significant and less than the less-than-significant impacts of the Project.

(3) Relationship to Project Objectives

Alternative C would accommodate the greater residential development capacity that could occur within the Specific Plan area under the Project through the addition of land use and zoning changes, although to a lesser degree. Furthermore, similar to the Project, Alternative C would include mobility enhancements including expanding pedestrian areas along portions of Main Street, Richmond Street, and Grand Avenue, which would help improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit within the Specific Plan area. However, these improvements would be to a lesser degree, as the eight additional parcels, which are located on the eastern end of Grand Avenue, would not be included as part this alternative. In addition, Alternative C would not include the same regulations and incentives as the Project intended to promote affordable and low-income income housing and would result in less of those housing options being developed. Furthermore, Alternative C may implement 2020-2045 RTP/SCS, AQMP, and Air Quality Element policies related to concentrating development near transit and reducing regional VMT to a lesser degree than the Project since the lower overall residential development totals may result in increased residential development elsewhere in the City and incrementally higher VMT in the Project area.

Specifically, Alternative C would achieve the basic Project objectives, but to a lesser degree:

- To provide an Update to the Adopted Downtown Specific Plan that will guide the future development of the Specific Plan area and provides land use and development standards, identifies improvements in the public realm, and provides a plan for infrastructure and public services to accommodate potential development.

- To promote the unique small-town “village” character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing.

- To attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers.
- To promote a range of housing options with opportunities for all incomes.
- To improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.

(4) Reduction Of Significant Project Impacts

Table VI-2, Comparison of Project and Alternatives Impacts, summarizes the impact comparison of the Project and its alternatives. The Project is noted for avoiding significant unavoidable impacts. On the other hand, Alternative C further diminishes less-than-significant impacts in various Project areas but introduces increased impacts concerning aesthetics, energy, greenhouse gas emissions, land use and planning, and transportation. Additionally, Alternative C would achieve the basic Project objectives, but to a lesser degree.

7. Summary of Alternatives to the Project

To summarize Project alternatives, as suggested in CEQA Section 15126.6(d), a matrix was prepared to summarize and compare the impacts of each Project alternative (see **Table VI-2, Comparison of Project and Alternatives Impacts**).

Table VI-2
Comparison of Project and Alternatives Impacts

Environmental Issue Area	Project	Alternative A - No Project	Alternative B - Reduced Specific Plan	Alternative C – Adopted El Segundo Specific Plan Boundary
Aesthetics	LTS	**Less Than** LTS	**Less Than** LTS	**Greater Than** LTS
Air Quality:				
AQMP Consistency	LTS	**Similar** LTS	**Similar** LTS	**Similar** LTS
Short-Term	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Long-Term	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Cultural Resources	LTS(M)	**Similar** LTS(M)	**Similar** LTS(M)	**Similar** LTS(M)
Energy	LTS	**Greater Than** LTS	**Greater Than** LTS	**Greater Than** LTS
Geology and Soils	LTS(M)	**Similar** LTS(M)	**Similar** LTS(M)	**Similar** LTS(M)
Greenhouse Gas Emissions	LTS	**Greater Than** LTS	**Greater Than** LTS	**Greater Than** LTS
Hazards and Hazardous Materials	LTS(M)	**Similar** LTS(M)	**Similar** LTS(M)	**Similar** LTS(M)
Land Use and Planning	LTS	**Greater Than** LTS	**Greater Than** LTS	**Greater Than** LTS

Table VI-2
Comparison of Project and Alternatives Impacts

Environmental Issue Area	Project	Alternative A - No Project	Alternative B - Reduced Specific Plan	Alternative C – Adopted El Segundo Specific Plan Boundary
Noise:				
Short-Term	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Long-Term	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Population and Housing	LTS	**Similar** LTS	**Similar** LTS	**Similar** LTS
Public Services – Fire Protection	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Public Services – Police Protection	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Public Services – Schools	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Public Services – Parks and Recreation:				
Existing Parks	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
New Facilities	LTS	**Similar** LTS	**Similar** LTS	**Similar** LTS
Public Services – Libraries	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Transportation	LTS	**Similar** LTS	**Greater Than** LTS	**Greater Than** LTS
Tribal Cultural Resources	LTS(M)	**Similar** LTS(M)	**Similar** LTS(M)	**Similar** LTS(M)
Utilities and Service Systems - Water	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Utilities and Service Systems - Wastewater	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Utilities and Service Systems – Solid Waste	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS
Utilities and Service Systems – Energy Infrastructure	LTS	**Less Than** LTS	**Less Than** LTS	**Less Than** LTS

NI = No Impact
LTS = Less Than Significant impact
LTS(M) = Less Than Significant Impact with Mitigation
SU = Significant Unavoidable

Table VI-3, Comparison of Alternatives – Meeting the Project Objectives, compares the alternatives in terms of whether they meet the Project objectives.

Table VI-3
Comparison of Alternatives – Meeting the Project Objectives

Does the Project Meet the Following Project Objectives?	Alternative A	Alternative B	Alternative C
To provide an Update to the Adopted Downtown Specific Plan that will guide the future development of the Specific Plan area and provides land use and development standards, identifies improvements in the public realm, and provides a plan for infrastructure and public services to accommodate potential development.	No	Lesser	Lesser
To promote the unique small-town "village" character, pedestrian friendly environment, and historic charm of Downtown El Segundo and enhance its identity to reflect local interests, create aesthetically pleasing and functional outdoor spaces and provide attractive multi-use public spaces enhanced with public art for events, entertainment, socializing, and playing.	No	Lesser	Lesser
To attract investment and increase the economic vitality of Downtown El Segundo to foster an active center serving residents, visitors, and local workers.	No	Lesser	Lesser
To promote a range of housing options with opportunities for all incomes.	No	Lesser	Lesser
To improve walkability and the pedestrian environment and support enhanced and efficient mobility opportunities for walking, driving, bicycling, and transit.	No	Lesser	Lesser
How many project objectives are met?	**0**	**5**	**5**

8. Environmental Superior Alternative

In addition to the discussion and comparison of impacts of a project and its alternatives, Section 15126.6 of the *State CEQA Guidelines* requires that an environmentally superior alternative be identified and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would generate the least amount of adverse impacts. Section 15126.6(e)(2) of the *State CEQA Guidelines* further states that if the No Project

Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives evaluated in this section includes Alternative A (No Project Alternative), Alternative B (Reduced Specific Plan), and Alternative C (Adopted El Segundo Specific Plan Boundary). **Table VI-2, Comparison of Project and Alternatives Impacts,** provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. **Table VI-3, Comparison of Alternatives – Meeting the Project Objectives,** compares the alternatives in terms of whether they meet the Project objectives. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Based on the alternatives analysis and **Table VI-2**, **Comparison of Project and Alternatives Impacts**, Alternative B, the Reduced Specific Plan Alternative, would be environmentally superior to the Project. Alternative B's aesthetic impacts would be less than those of Alternative C. Alternative B's daily work and household VMT would be less than that of both the Project and Alternative A. Alternative B would also consume less water, generate less wastewater and less solid waste, result in and fewer residents than the Project. Therefore, Alternative B would be the environmentally superior alternative.

In accordance with the *State CEQA Guidelines* requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives, as summarized in **Table VI-2**, Alternative B, the Reduced Specific Plan Alternative, would be environmentally superior to the Project. In most environmental areas, Alternative B would result in lesser degrees of Project impacts due to overall reduction in development. However, it should be noted that Alternative B meets the Project's five objectives, but to a lesser degree.

9. References

14 CCR 15126.6[a].

California Public Resources Code, Section 21081; see also 14 CCR 15091.

CEQA Guidelines Section 15126.6(c).

City of El Segundo, 2020 Urban Water Management Plan, adopted August 2021.

City of El Segundo, Open Space and Recreation Element, 1992.

VII. Preparers of the EIR and Persons Consulted

Lead Agency

City of El Segundo
Community Development Department
350 Main Street
El Segundo, CA 90245
Paul Samaras, AICP, Principal Planner

EIR Consultant

EcoTierra Consulting, Inc.
633 W. 5th Street, 26th Floor
Los Angeles, CA 90071
Craig Fajnor, Principal
Jenny Mailhot, Project Manager
Jennifer Johnson, Environmental Planner
Paulette Franco, Environmental Planner
Marisa Wyse, Environmental Planner

Architecture

RRM Design Group
3765 S. Higuera, Ste. 102
San Luis Obispo, CA 93401
Diane Bathgate, Planning Principal
Jami Williams, Planning Principal
Debbi Jewell, Senior Urban Designer

Air Quality, Greenhouse Gas Emissions, Noise Consultant

Noah Tanski Environmental Consulting
Noah@environmental.net
Noah Tanski, Principal

Historical Resources Consultant

Teresa Grimes
Teresa.grimes@icloud.com
Teresa Grimes, Historic Preservation

Traffic Consultant

Fehr & Peers
600 Wilshire Boulevard, Suite 1050
Los Angeles, CA 90017
Alex Melaragno, Transportation Engineer/Planner

Water Supply Assessment Consultant

Maddaus Water Management, Inc.
105 Zephyr Place
Danville, CA 94526

Michelle Maddaus, President, Principal Engineer
Tess Kretschmann, Staff Engineer
Cielo Cruz, Water Resources Project Assistant

Persons Consulted

Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County
Research & Collections
900 Exposition Boulevard
Los Angeles, CA 9007

Stacy St. James, Coordinator
South Central Coastal Information Center
California State University, Fullerton
Department of Anthropology, MH-426
800 North State College Boulevard
Fullerton, CA 92834

Andrew Salas, Chairman,
Gabrieleno Band of Mission Indians-Kizh Nation
P.O. Box 393
Covina, CA 91723

Hugo Perez, Police Captain
El Segundo Police Department
348 Main Street
El Segundo, CA 90245

Casey Snow, Battalion Chief “C” Platoon
City of El Segundo Fire Department
314 Main Street
El Segundo, CA 90245

Kim Linz, Chief Business Official
El Segundo Unified School District
Klinz@esusd.net

Andrew Green, Cultural Resources Analyst
Native American Heritage Commission
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691

VIII. Acronyms and Abbreviations

AB	Assembly Bill
ABM	Activity-Based Model
ACM	Asbestos Containing Materials
ACS	American Community Survey
ADA	Americans with Disabilities Act
ADPA	Archaeological Data Preservation Act
ADU	accessory dwelling units
AF	acre-foot
AF/Y	acre-foot per year
AIA	airport influence area
ALUC	Los Angeles County Airport Land Use Commission
ALUP	Airport Land Use Plan
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARPA	Archaeological Resources Protection Act
AST	aboveground storage tanks
AWWA	American Water Works Association
Basin	South Coast Air Basin
BAU	business-as-usual
BERD	Built Environment Resources Directory
BMP	Best Management Practice
BRT	Bus Rapid Transit System
Btu	British thermal units

C-2	Neighborhood Commercial Zone
C&D	construction and demolition
CAA	Federal Clean Air Act
CAAQS	California ambient air quality standards
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Prevention Program
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalOSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
CAL REG	California Register of Historical Resources
CAO	Cleanup and Abatement Orders
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	Clean Air Resource Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDI	construction, demolition, and inert
CDO	Cease and Desist
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act

CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CF	cubic feet
CFR	Code of Federal Regulations
CH_4	Methane
CHP	The California Highway Patrol
CHRIS	California Historical Resources Inventory System
CIT	California Institute of Technology
CIWMB	California Integrated Waste Management Board
CLUP	Comprehensive Land Use Plan
CLWA	Castaic Lake Water Agency
CMP	Construction Management Plan
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO_2	carbon dioxide
CO	carbon monoxide
COG	council of governments
CPUC	California Public Utilities Commission
C-RS	Downtown Commercial
CTC	California Transportation Commission
CVC	California Vehicle Code
CWA	Clean Water Act
CWC	California Water Code
Cycle-Track	Class IV Protected Bikeway
dB	decibel
dBA	A-weighted decibel
DDR	Downtown Design Review

DIVCA	Digital Infrastructure and Video Competition Act of 2006
DOE	United States Department of Energy
DOF	Department of Finance
DSP	Downtown Specific Plan
DTSC	Department of Toxic Substance Control
DWR	California Department of Water Resources
EA	Environmental Assessment
EE	Energy Efficiency
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EMFAC	On-Road Emissions Factor
EMS	emergency medical service
EO	Executive Order
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency (see also USEPA)
EPCA	Energy Policy and Conservation Act of 1975
ERO	Electric Reliability Organization
ERP	Emergency Response Plan
ESA	Environmental Site Assessment
ESEA	El Segundo Employers Association
ESFD	El Segundo Fire Department
ESL	Environmental Screening Levels
ESMC	El Segundo Municipal Code
ESPD	El Segundo Police Department
ESPL	El Segundo Public Library
ESUSD	El Segundo Unified School District

ETo	evapotranspiration
EVs	electric vehicles
FAA	Federal Aviation Administration
FAR	floor area ratio
FCC	Federal Communications Commission
FEHA	Fair Employment and Housing Act
FEMA	Flood Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FTA	Federal Transit Administration
gpd	gallons per day
GHG	greenhouse gas
GPCD	gallons per capita per day
gpm	gallons per minute
gpy/sqft	gallons per year per square foot
GWh	gigawatt-hours
HCD	California Department of Housing and Community Development
HCM	Historic Cultural Monument
HERO	DTSC Human and Ecological Risk Office
HFC	hydrofluorocarbon
HMBP	Hazardous Materials Business Plans
HMGP	Hazard Mitigation Grant Program
HQTA	High Quality Transit Area
HRAR	Historical Resources Assessment Report
HSC	State Health and Safety Code
HWRP	Hyperion Water Reclamation Plant
Hz	hertz

IBC	International Building Code
IFC	International Fire Code
In/sec	inches per second
IS	Initial Study
ISO	Independent System Operator
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
ITE	Institute of Transportation Engineers
kW	kilowatts
kWH	kilowatt-hour
LACM	Natural History Museum of Los Angeles County
LACoFD	County of Los Angeles Fire Department
LADWP	Los Angeles Department of Water and Power
LAX	Los Angeles International Airport
LAWA	Los Angeles World Airports
LBP	lead-based paint
Lbs	pounds
L_{eq}	equivalent energy noise level
LID	Low Impact Development
L_{max}	maximum instantaneous noise level
L_{min}	minimum instantaneous noise level
LOS	Level of Service
LTA	Local Transportation Assessment
LTCP	Long-Term Conservation Plan
LUST	leaking underground storage tank
LUT	Land Use and Transportation
LST	localized significance thresholds

M-2	Heavy Industrial Zone
MATES V	Multiple Air Toxics Exposure Study V
µg/m^3	micrograms per cubic meter
mgd	million gallons per day
MLD	most likely descendent
MM	Mitigation Measure
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MRF	material recovery facilities
MTA	Los Angeles County Metropolitan Transit Authority
mpg	miles per gallon
MPO	Metropolitan Planning Organization
MUTCD	California Manual on Uniform Traffic Control Device
MW	megawatts
MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscape Ordinance
MWh	megawatt-hours
NAAQS	National ambient air quality standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NEHRP	National Earthquake Hazards Reduction Program
NERC	North American Electric Reliability Corporation
NF_3	nitrogen trifluoride
N_2O	nitrous oxide
NHMLA	Natural History Museum of Los Angeles County
NHTSA	National Highway Traffic Safety Administration
NMA	Neighborhood Mobility Areas

NO_2	nitrogen dioxide
NO_x	nitrogen oxide
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OEM	County of Los Angeles Office of Emergency Management
OES	Governor's Office of Emergency Services
OPR	Office of Planning and Research
O-S	Open Space Zone
OSHA	Occupational Safety and Health Administration
OVA	organic vapor analyzer
P	Parking Zone
Pb	lead
PCB	polychlorinated biphenyl
PCH	Pacific Coast Highway
PDF	Project Design Feature
PEIR	Program EIR
P-F	Public Facilities Zone
PFC	perfluorocarbons
PGA	Priority Growth Areas
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppb	pounds per billion
ppd	pounds per day

PPH	people per household
ppm	parts per millions
PPV	peak particle velocity
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
PRPA	Paleontological Resources Preservation Act
PSI	pounds per square inch
R-2	Two-Family Residential Zone
R-3	Multi-Family Residential Zone
R&D	Research and Development
RCP	Regional Comprehensive Plan
RCRA	Resource Compensation and Recovery Act
REC	recognized environmental concern
RFS	Renewable Fuel Standards
RHNA	Regional Housing Needs Assessment
RPS	Renewable Portfolio Standards
RSL	regional screening levels
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SBE	State Board of Education
SBRPCA	South Bay Regional Public Communications Authority
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District

SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Community Strategy
SCV	Santa Clarita Valley
SDS	Safety Data Sheet
SEMS	Superfund Enterprise Management System
sf	square foot
SF_6	sulfur hexafluoride
SHL	California Historical Landmark
SH-W	Light Industrial and Office Zone
SHW	Smokey Hollow West Specific Plan
SLF	Sacred Lands File
SO_X	sulfur oxide
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SOHP	State Office of Historic Preservation
SOI	Spheres of Influence
SPHI	California Points of Historical Interest
SPPC	Spill Prevention, Control, and Countermeasure
SRA	source receptor area
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	Society of Vertebrate Paleontology
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TA	Transportation Assessment

TAC	Toxic Air Contaminants
TAZ	transportation analysis zone
TDM	Transportation Demand Management
TMP	Transportation Management Program
TNM	Traffic Noise Model
TOD	transit-oriented developments
TPA	Transit Priority Areas
TRC	tribal cultural resources
TSCA	Toxic Substances Control Act
TSM	Transportation Systems Management
UBC	Uniform Building Code
USC	United States Congress
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency (see also EPA)
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
VdB	vibration decibels
VMT	vehicle miles traveled
VMT/SP	VMT per service population
VOC	volatile organic compounds
W	watts
WBMWD	West Basin Municipal Water District
WEAP	Worker Environmental Awareness Program
Wh	watts-hour
WSA	Water Supply Assessment

WSAP	Water Supply Allocation Plan
WSV	Water Supply Verification
YTD	Year to Date